JOS C. N. RAADSCHELDERS · ERAN VIGODA-GADOT

WITH MIRIT KISNER

GLOBAL DIMENSIONS

of PUBLIC

ADMINISTRATION

AND GOVERNANCE

A COMPARATIVE VOYAGE

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FOREWORD

It is a great pleasure to be able to contribute a foreword to this book by two eminent scholars in the field of public administration. The pleasure arises not just from cooperating with these two colleagues, but also from recognizing and emphasizing several important points being made in this volume. These are issues which are not entirely new but which require further discussion and elaboration. That need for additional elaboration is all the more true as governance changes in response to changing demands, changing sources of legitimacy, and a changing resource base. This volume is therefore an important statement about contemporary governance and the role of public administrators in those processes.

The first important point made through this volume is the importance of public administration in governance. The conventional description of public administration emphasizes the formal structures of bureaucracy and the implementation of public policies. But it is crucial to understand the more central role that the bureaucracy plays, especially in the contemporary state. As well as "mere administration," the public bureaucracy is also a major source of policy advice for ministers and the legislature. And by making secondary legislation, bureaucracies are themselves major sources of rules for the society.

But that "mere implementation" is also crucial for governance, providing the linkage between state and society. Citizens do not interact on a

regular basis with their elected officials, even in well-functioning democracies, but they interact on an almost daily basis with public bureaucrats such as postal personnel, the police, social workers, public health officials, and the like. The interactions between state and society are important not only because the lower echelons of the bureaucracy make decisions about clients. These interactions also provide citizens with a picture of the nature of that state, including its probity. Thus, the bureaucracy is central to the legitimation of the contemporary state.

A second important dimension of this volume is that it emphasizes the importance of comparison. Much of our understanding of public administration is restricted to the institutions of our own country, or perhaps a few other countries that are relatively similar. Although a thorough analysis of our own system is desirable and essential for understanding additional administrative systems, it is not sufficient for developing theory, or for more nuanced understandings of how governance and administration actually function. That said, comparison is not easy, but this volume provides the reader with an appreciation of the possibilities of effective comparison.

As well as examining administration comparatively, this volume extends the discussion of the role of multiple governance systems to consider the increasing global dimension of governance and administration. While we need to understand differences among individual governance systems, it is increasingly difficult to discuss these systems in isolation. One obvious impact of globalization of governance is the diffusion of ideas, but the effects are more pervasive. On the one hand the close connections within the international system limit the capacities of governments. On the other hand, however, there is a much larger field for governments and public administrators to play on, with the capacity to move policy problems among venues, especially in more institutionalized transnational entities such as the European Union.

As well as discussing the contemporary nature of governance and public administration, this volume also supplies a rich historical background for understanding that contemporary reality. The authors, and especially Professor Raadschelders, have made numerous contributions to the study of administrative history, and those intellectual roots are demonstrated very clearly in this volume. The historical backgrounds of individual governance systems produce traditions and some path dependence that are crucial for understanding contemporary actions.

Finally, this volume points to issues in the governance of the welfare state, as well as demonstrating the importance of the warfare state. Both of these emphases on the activities of the state produced distinctive patterns of

governance and distinctive challenges for administration. While the warfare state may demand the development of efficient administrative systems for defense, the welfare state requires that plus the capacity to deliver services to large numbers of people in a humane manner. Further, the effective functioning of the welfare state is crucial for the legitimation of the contemporary state.

In summary, this is an important book that should be read by the expert and the novice alike. It presents an extensive, and at the same time nuanced, analysis of public administration. Perhaps more than anything it demonstrates how central public administration is to governing, and that improving and strengthening administration is crucial for an effective state.

B. Guy Peters
University of Pittsburgh

ACKNOWLEDGMENTS

This book is a true voyage, for those who wrote it and for those who shall read it. It started as an idea that emerged during a discussion between the two authors, who accidentally met in the exhibit hall during the annual conference of the American Society of Public Administration in Baltimore, mid-March 2011. We later realized that many accidental events shape our world in a peculiar way. Prominent unusual events impact our lives through governmental decisions and non-decisions, actions and reactions, reforms and regressive-reforms in a culturally diverted global environment. The voyage of this book started in that meeting.

We talked about the state of comparative research and at some point observed that an update of Ferrel Heady's book would be in order, but that it had to be a new book. Heady's first edition had been published in 1966 and contained 115 pages. By the time its sixth iteration came on the market (2001), it counted 484 pages. Heady's study was unusual in that it combined attention to political with that of bureaucratic institutions and organizations. It was even more unusual in that it was truly global in perspective, that is, inclusive of all world regions. It became clear to us that merely updating Heady's book would not be sufficient. Instead, we felt that content on political and bureaucratic institutions had to be matched with content on management and policy areas. Heady's study is mainly descriptive. His study is also comparative, and given that it includes all world regions, it is global.

However, we now live in a time when globalization affects domestic politics, policies, and bureaucracies in a manner very different from the time when Heady wrote his first edition. The traditional empirical research using a comparative perspective focuses on the political system, or some policy area, or bureaucracy, of a number of generally "related" countries. We wanted to address politics, bureaucracy, and policy in one descriptive volume that treats the reader to insights into converging trends in government and governance, and into divergence of policy making and implementation. Globally, governments face comparable challenges; domestically, they solve or resolve them in the context of a political-administrative tradition and culture that changes, but perhaps not as rapidly as their natural and social environments do (just think of natural disasters such as major hurricanes and tsunamis, earthquakes, and volcanic eruptions; and of manmade disasters such as 9/11). The political-administrative system of a country evolves and adapts to changing environments, but how it appears in the present is a product of the past. While Heady did address historical development, one important feature of this volume is that it discusses the emergence and development of governments throughout the world from the earliest times up to the present.

As the reader can see, we have built this book upon a substantial amount of literature. In other words, without all that research we would not have been able to write this book. And the research we have accessed is not limited to public administration and political science, for we draw upon publications from law, history, evolutionary biology, anthropology, archaeology, cognitive psychology, economics, and so forth. Thus, another feature of this book is its explicit interdisciplinarity. How could it be otherwise? Government is a social phenomenon existing since human beings adopted sedentary lifestyles, but in its current role and position in society it is unique to the modern age (that is, since the late eighteenth to early nineteenth centuries). In fact, it is central to the survival of modern society, and thus it is that it has drawn attention from scholars across the social sciences.

In our approach to understanding the role and position of government in society in the world today, we are generalists. When writing the chapters of this book, we have not sought the input of specialists, but instead relied on the knowledge we acquired in the course of our own studies that started as students and have continued ever since; and on the discussions we have had over the years with colleagues about the challenges and opportunities of comparative research. Raadschelders presented an expanded version of Chapters 2 and 3 at the Workshop in Political Theory and Policy Analysis of Indiana University (November 2011), and he is grateful for the commentary

Public Affairs at The Ohio State University, who were a source of inspiration and fresh critical thinking about this project and its implications. We hope to continue our studies in this area and by so doing improve the comparative knowledge and capacities for future studies in the public sector. Finally, we dedicate this book to our loved ones, for they shared the voyage with us, over time, space, and mind.

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Jos C.N. Raadschelders, Eran Vigoda-Gadot
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GLOBALIZATION AND GOVERNMENT

Combining Global and Comparative Perspectives upon the State of Modern Government

Peple today live in a highly interconnected world. Perhaps we can even say a hyper-connected world, because the speed of communication has increased to the point that little happens that is not known on the other side of the globe within minutes, even seconds. There is no shortage of information, and one could very well argue that we are drowning in a deluge of information, making it increasingly difficult to determine what is important and what is not. In this hyper-connected world people are increasingly aware that it is a small world and that it may even be shrinking further. This awareness is perhaps best captured in the concept of *globalization,* and is most manifest in the interdependence of economies (think of trade, capital and investment movements, multinational corporations), the seemingly accelerating communication exchanges, rapid dissemination of knowledge, increasing managerial and technological innovations, the spread of fast food chains across the globe (e.g., McDonaldization), tourism and the migration of peoples, and the increased use of the English language as the *lingua franca* for the worlds of government, business, transportation, and education.

However, globalization in its various manifestations has made people also more aware of world-regional, national, and even subnational cultural differences. Globalization has not and—we suspect—will not in the foreseeable future lead to the kind of cultural uniformity some people fear. It is

actually because of globalization that people are more protective of what makes them unique as a nation and a culture. Therefore, to understand the world today we need a global perspective next to a comparative perspective. Globalization allows for more comparison, encouraging knowledge in and about different societies. Comparison also reinforces the globalization of knowledge and the manifestation of good ideas that structure good governance.

Yet, much of the literature concerning globalization is focused on economy, communication, and so forth, and it is surprising to see that—as far as we know—there is no study that probes what a global perspective upon government entails. There is ample attention for government in the studies of public administration and political science, but they are limited to providing a comparative perspective and then usually upon a specific group of countries. The systematic comparative study of government started in the late eighteenth to early nineteenth centuries (see Appendix 1), with special attention paid to the structure of legal and political systems. From the second part of the nineteenth century, comparative studies started to focus more and more on substantive policy areas, and that was because governments were increasingly pressed to develop policies in response to the challenges posed by industrialization, urbanization, and rapid population growth. Seeking best practices elsewhere, civil servants looked for experiences from elsewhere. Up to the late twentieth century that comparative perspective served governments and their citizenry well.

In the past 20 to 30 years or so, governments are increasingly confronted with problems that cannot be resolved within their own borders. There are many examples of policies that work far beyond the borders of specific nations. Policy and administration issues become more and more global concerns that require global knowledge and global remedies. This is obvious for such problems as global warming, environmental pollution, and international terrorism. But the case can be made that even policies that are seemingly domestic are influenced by events elsewhere. The member states of the European Union are not the only territories that experience interlocking; the whole world is becoming intertwined, albeit to regionally varying degrees. What is the role and position of governments in their respective societies in the context of a globalizing world? Is globalization changing the structure and functioning of governments, and if so, how? Also, are governments themselves globalizing? There are at least three ways to look at that. First, it is only in the past 60 years or so that governments effectively control the entire landmass of the earth (see Scott, 2009). Second, many governments are members of multiple intergovernmental

and supranational (forum) organizations. Third, and posed as a question, could governments be integrating into larger regional bodies, as is happening in the European Union and was predicted—as a general trend of integration—by Norbert Elias (1939)?

In this book we embed the traditional comparative perspectives upon government in a global perspective. We will see that with respect to structural institutional arrangements, governments have been converging toward organizing their territories by means of jurisdictional boundaries from the local up to the national level and governing them through bureaucratic organization. At the same time some of the internal structural arrangements for political order still vary. We will see that governments face comparable policy challenges, but that there are functional differences between these policies. To understand the world in which we now live, it is important that citizens, practitioners, and academicians understand the delicate balancing act between structural arrangements both at a global (jurisdictions and bureaucracy) and domestic level (variation in political–administrative system) on the one hand, and functional (policy) differences on the other. Therefore, we use a method of systematically analyzing a wide range of public policy and administration cases from across the globe to illustrate how modern government is different and similar in many ways. Our selection of public administration, policy, and management challenges from across the globe illustrates what many societies share regardless of geographic location, ethnical structure, or cultural differentiation. The problems, as will be shown, are quite similar, but the actors and the scenes are different and call for modifications in the form of action by policy makers. The balance we all search for is between the policy problem and the suggested explanations and remedies.

The remainder of this book is devoted to analyzing that balance. In this interconnected world it is extremely important to develop a general understanding of the similarities and differences between countries, policies, and organizations. In this book we will do so by presenting examples of government structures, of public organizations, and of policies, and illustrating each of these with examples from various countries. This should enable any reader to analyze her/his own country and its policies and organizations in terms of the examples described.

In this chapter we will first describe the general approach used in this volume, which is the notion that reality can be captured and understood at different levels of abstraction (Section 1). At the most concrete level "reality" is tangible through day-to-day operations and actions. These operations and actions are not random but conducted within a formally

and informally circumscribed decision-making arena. Who makes decisions about what? Who has veto power in determining who makes decisions? This constitutes an intermediate level of analysis since that which prompts, guides, influences, and manipulates day-to-day operations and actions is not always tangible. This intermediate level of analysis, i.e., that of rules that bind and actors in decision making, is embedded in a more abstract environment that is made up of the deep-seated values that are shared in a society.

In Section 2 we will briefly "visit" the concept of globalization. It is a very powerful concept in our time, but is it adequately describing what is happening in the world in general, and in the world of governments more specifically? This question is important because there is ample evidence that globalization on the one hand has increased awareness of and desire for localization on the other. Through Twitter, Facebook, and e-mail, people are more interconnected than ever before, but it has made people also more aware of "seeing" and "feeling" what differentiates them from "others." It is one thing to say that we are citizens of the world, but does that mean that we are less and less citizens in and of a specific, jurisdictionally bounded government?

The statement that people are more interconnected than ever before and, simultaneously, more aware of what separates them from "others" means that we have to consider what globalization means in relation to localization. By habit, people compare, and so do the officials (that is, elected officeholders and civil servants) in their governments. Can we really understand the impact of globalization upon governments without considering how these governments and their citizens approach their domestic and international challenges? We believe it is important, perhaps even vital, to seek understanding of how this trend and phenomenon of globalization still requires comparative understanding. In Section 3 we shall outline why a combined global and comparative perspective is needed in the "world of government" today.

This "world of government" can be conceptualized in various ways. The authors of this volume approach it from their respective backgrounds. Vigoda-Gadot identifies himself as a political scientist and Raadschelders as a public administration scholar. Both the studies of public administration and political science pursue and develop comparative perspectives. Those who identify with the study of public administration seem to focus on policy processes and bureaucratic arrangements in terms of organizational structure, while those who define political science as their academic home sooner consider policy content or substance and bureaucratic

arrangements as power structures. As we were developing the content of this book, we acknowledged that administration and policy could not be separated. While there are ample monographs and textbooks in comparative politics, in comparative administration, and in comparative public policy, we felt it important to connect the three (for examples of comparative studies, see Appendices 1 and 2). Politics and administration are but two sides of the same coin. Separating politics from administration and policy is nothing but artificial in contemporary government. It is, thus, that we find it useful to consider why a public administration and political science perspective must be connected (Section 4).

Levels of Analysis and Understanding

With regard to levels of analysis, the distinction made by Larry Kiser and Elinor Ostrom (1982) is very useful in a global and comparative context. They distinguished a constitutional, collective, and operational level of analysis. The constitutional level concerns the foundations of a polity and includes both formal legislation, such as a constitution and legislation emanating from it, as well as primary and secondary legislation, and the values and norms shared in a society (i.e., what constitutes society) (see Lane, 1996). The collective level draws attention to the decision-making arenas of the public realm and includes legislators but also the institutional arrangements that facilitate the participation of stakeholders (that is, citizens, corporate executives, nonprofit groups, interest groups, and so forth) and to the nature of the decision-making processes (hierarchical or networks; iron triangles; issue networks; corporatism). Finally, the operational level concerns the day-to-day operations of government (implementation, service delivery, and so forth). It is amazing to see how often scholars in public administration and political science conceptualize their object of research at these three levels of analysis, even if they do not explicitly refer to Kiser and Ostrom (for 16 examples in various specializations in public administration and political science, see Raadschelders, 2003, pp. 386–387).

Using these three levels of analyses, we depart from the traditional, disciplinary focus on government. The disciplinary structure of academia today, which dates back to nineteenth century Germany, is not useful when attempting to understand a social phenomenon such as government that deals with complex, wicked problems and realities rather than only with simple problems and realities. The study of public administration is an umbrella study under which the partial understandings of the various social

sciences, humanities, and natural sciences, in as far as they contribute to knowledge about government in society, can be subsumed. Hence, at the very least we believe that an interdisciplinary approach is much more appropriate (Raadschelders, 2011b, 2011c). At the same time, even an interdisciplinary approach might "suffer" from the constraints set by the parameters of the traditional disciplines. Thus, we opted for a problem-oriented approach and a framework that allows for comparison across continents, nations, levels of government, policies, and time (see Chapter 2). The Kiser and Ostrom framework is neutral, that is, not ethnocentric, and can be applied to analyze the development of society and government on the one hand and the nature of government's interaction, overall structure, and internal processes on the other. To be sure, the disciplines (for instance, political science, anthropology, sociology, economics, history, psychology, and so forth) and the various approaches (for instance, game theory, positivism, phenomenology, critical theory, and so forth) can and do provide valuable insights into the phenomenon of government in society, but it is only in a problem-driven context that we can see and appreciate their contribution to overall understanding.

Globalization

Globalization affects societies in many ways. The literature is vast, but two recent publications provide a good introduction (Mansbach and Rhodes, 2013; Chernotsky and Hobbes, 2013). Economic distress in one country not only spills over into neighboring countries but actually far beyond as the recent economic depression has shown. But globalization in general, and enhanced knowledge of what is happening 10,000 miles away, has also made populations much more aware of national and cultural differences. Against that background governments have to make policies, with the challenge to balance demands from an international/global environment with those of a more domestic nature. At the operational level, then, many governmental challenges can no longer be managed without cross-border and cross-national collaboration.

The technological revolution has had multiple and far-reaching effects upon societies. The impact of technological advancements upon societies has been that the amount of information available is larger than ever, increases quicker than ever, and encourages people to scan information in bits and pieces rather than digest a body of thought carefully (Bohne and others, 2014). We are barely beginning to understand the consequences of

the technological revolution at the biochemical level (Carr, 2010), let alone that we understand how these changes in our brain will affect our societal behavior. At the collective level the major influence of technological revolution has been that the "width of social time" (that is, the time it takes for communication between two people) has been reduced to mere seconds. Where public decision makers 100 years ago could take a few days or weeks following a missive to contemplate further ramifications, nowadays e-mail and other communication devices have raised our expectation of quick responses. In the public sector context, though, the quickness of a "tweet" is not necessarily equivalent to quality action. Finally, at the operational level, technology has enabled quick exchanges of best practices between public servants of different countries.

Combining a Global and Comparative Perspective

From the moment that human beings emerged on the globe, they have traveled from one area to another just as any other species. What differentiated human beings from other creatures in the animal world, though, is not only a sense of consciousness of their own mortality, but also a desire to have and to hold what the other owned. From a psychological point of view, comparing is learning. Pretty quickly after the day of birth, an individual compares her/himself to the environment, to other individuals, and to important peers just to say something about themselves and grow, as a result of the learning/comparing process. From a historical point of view, the comparative method became a tool in the hands of the collective to learn and grow. Indeed, tens of thousands of years ago human beings developed a keen sense of property, and this was strengthened when they started to lead a sedentary rather than a nomadic life. These sedentary communities established trade relations, and through these people became aware of the possessions and wealth of others. Unlike animal prides, flocks, herds, and hives, human communities increasingly settled in one space, circumscribing that living space by means of boundaries. Literally, the human inclination to define space as property slowly but surely gobbled up what used to be common land. Human beings enclosed lands to the point that today there is little land left that does not belong to an artificially circumscribed jurisdiction. Humans "flag" their lands with lines in the sands, and they seek to strengthen these lines by any means available.

From very early on, and even from before people became sedentary, human communities have subjugated one another. Human political

communities pulsed and throbbed through phases of ascendance and decline, from being subject to another polity, to being the local or regional hegemon, and then back to being subject to another hegemon. It is in this context of rising and declining communities and polities that human beings became comparativists. Most often comparison fueled the desire to have what the other owned, leading to wars of acquisition. As these human communities increasingly defined themselves in terms of polities, they not only sought to acquire each other's possessions, but also copied each other's "best" practices. So, where did this "taking" and copying get the human race?

The answer to this question is both simple and complicated. It is simple when noting that the landmasses of the earth have been enclosed by jurisdictions, save Antarctica. Make no mistake, what started as small, politically circumscribed jurisdictions within an overall and much larger commons has grown to encompass all land as being politically circumscribed. There are no commons left (except local commons governing certain aspects of people's lives). In this landmass, bereft of commons, people as citizens and as political and administrative officeholders in these politically circumscribed jurisdictions still, and for the foreseeable future, look for better practices. That is why a comparative perspective remains useful and important.

However, in this historical time and geographical context it is as important to augment the comparative perspective, so inherent to human beings, with a global perspective. As a species, the human race has circumscribed the landmasses in which it lives into jurisdictions. People today, anywhere, "belong" to a jurisdiction, and they identify with it. These people will always compare their own situation with that of others. It is thus that they have developed comparative perspectives. Such a comparative perspective is sought for reasons of improvement, betterment, acquisition, and enlightenment. Thus far, the comparative perspective sought was systematic. That is, people in general and scholars in particular strived to systematically develop perspectives upon social phenomena that included most similar and most different systems. In this volume we depart from such a systematic comparative approach. In fact, we argue that a systematic comparison *only* will no longer serve the understanding of government's role and position in society today. Instead, we need to combine global and comparative perspectives.

The global perspective upon governments' role and position in society is one that recognizes convergence toward circumscribed jurisdictions governed through horizontally and vertically organized bureaucracies. The comparative perspective upon governments' role and position in

society is one that recognizes cultural differences in policies and policy making. In this book, the elements testifying to convergence, i.e., globalization, of governments are addressed in Chapters 2 to 8; the elements highlighting the differences are displayed in Chapters 9 to 12.

Combining the Studies of Administration and Politics

In governments today politics and administration are very much intertwined. The days are over that governments "lorded" over their respective societies, where governments and the elites in them could rule without too much concern for the populace at large. In terms of political theory, the Atlantic (that is, American and French) Revolutions of the late eighteenth century subjugated—for the first time in history, and at least in theory and in terms of ideal—the governing elite to the people. It may be so that in the practice of governing, i.e., running a society, Robert Michels' "iron law of oligarchy" (1966) is unavoidable, but that practice is countered—at least— by a notion and ideal of (representative) democracy.

People do not compare properties, habits, customs, and so forth, simply to improve their own situation even when at the expense of others. People also compare out of simple curiosity. And that was fine, since historically governments did not provide much more than services that maintained the order and safety in communities through a strong ruler. This ruler was not expected to provide services beyond overall order and safety. For most of history, humankind has relied on rulers providing order and safety and accepted that such could only be possible through taxation in labor or kind and—later—money. However, in the world today humankind relies on governments to not only provide order and safety through military, policing, and judicial services, but also to provide for growth opportunities through welfare and well-being services.

When it comes to comparing habits of governance, people first compared how the relation between rulers and ruled was organized and what it could be. Indeed, the origins of political science go back to ancient Greece, and from the start this included a comparative perspective (see Appendix 1). As government size increased from the sixteenth century on, interest in politics was augmented with attention for administration. The study of comparative administration really took off in the early nineteenth century.

The comparative literature in public administration and in political science is substantial, with the former focusing on bureaucracy and on policy processes while the latter addresses power, the political system, and

policy substance. Especially in textbooks, public administration and political science are often treated separately, but one of the best comparative public administration studies is that by Ferrell Heady, and he combined attention to public administration with that of political systems. With Heady we believe that understanding the role and position of government in contemporary societies requires that both administration and politics are included. However, we are also convinced that policy has to be part of that comparative perspective, since that is what administration and politics do: make policy and thus engineer society. The canvas that we attempted to paint in this book is vast, and the literature we have consulted goes far beyond public administration and political science. We have no doubt that literature has been overlooked by us and hope that readers will point out where we are lacking.

Audience for and Structure of This Book

This book is not written as a textbook, although we will not be surprised if many will use it as such. Actually, there are plenty of textbooks available in the areas of comparative administration, comparative public policy, and comparative politics. The comparative politics books often provide a country-by-country discussion using a prescribed template or provide thematic comparisons of policy areas. Comparative administration books generally focus on either bureaucratic structure or the policy process. These books are necessary in any curriculum that advances a comparative perspective and are necessary for anyone who pursues a professional degree in public affairs with an eye on a public sector career. Ours is a different creation, though. We strongly feel that what is missing is a book that provides a rationale for comparative understanding that encompasses the globe. We believe that this book fills that void, and it is, therefore, much more an exploration of and voyage into a combined global and comparative perspective than it is a textbook per se.

That said, what is the audience for this book? Obviously, students of public affairs (whether in public administration, public policy, public management, or political science programs) are a prime target group. We strongly believe that a global and comparative perspective should be part and parcel of any curriculum in public affairs. The time that most politics and policy are domestic is long gone. This book, though, is not only relevant to public affairs students, but actually to any student, whether studying business administration, regional and urban planning, health care

management, international and area studies, and so forth. Furthermore, this book will provide useful insights to anyone who works in countries other than that of their citizenship. Hence, employees in multinational corporations, diplomats, and military personnel will find in these pages much that is of interest to them. In the hyper-connected world in which we live, and where individual lives at the local level are directly influenced by events and developments far away, every citizen profits from a global and comparative perspective upon the world that goes beyond the stereotypical understandings that are generated by the bullet-point—breaking!—news and information format of today. To understand who we are and how we came to be, we need knowledge of our specific geographical and historical location, and that cannot be done without a comparative perspective.

This book is divided into 13 chapters. General observations and a conceptual framework have been outlined in this chapter. Chapters 2 to 12 have been organized in two parts. In Part I, Chapters 2 to 8, we describe and analyze the origin, development, and dissemination of government all over the world. In Chapter 2 we describe the origins of government, governance, and public administration, while in Chapter 3 we analyze the long trend toward territorialization and bureaucratization of governments across the globe. Chapters 2 and 3 serve as the background for Chapter 4, in which we discuss state-making, nation-building, and the changing nature of citizenship. In each of these chapters we will provide illustrations from various countries.

Next come several chapters that concern the internal structure of government. First, in Chapter 5 we discuss the institutional superstructure of governments, including: types of political systems (e.g., traditional, authoritarian, democratic; presidential–parliamentary; unitary–federal), balance and division of power from the national down to the local levels, the nature of central–local or intergovernmental relations, and multilevel government. Bureaucracy is a vital component of that political superstructure, so we will pay attention to it in Chapter 6. There are no countries in the world where the public sector is not organized as a bureaucracy, so in terms of structure the similarities between countries are striking. How they function, though, varies with culture and thus we will also pay attention to differences in bureaucratic cultures. Following the chapters that focus on constitutional (Chapter 5) and collective levels (Chapter 6), we need to pay attention to the operational level of organization and management (Chapter 7), including organizational technology, communication, organizational behavior, and organizational change and reform. We pay separate attention to another element that we regard as operational in nature and

that involves the nature of political-administrative relations and the practice of human resource management (Chapter 8).

In Chapters 9 to 12 we address issues, policies, and services that are directly visible to any citizen. We picked 33 countries and added two American states (California and Wisconsin) as well as the United Nations (U.N.) Security Council. These chapters do not explicitly offer a systematic comparative perspective. Instead we picked countries from every continent, discuss one policy area for each country, and show that countries face comparable challenges. In two chapters we discuss the traditional government functions, activities, and policies of defense, policy, and judiciary (Chapter 9) and of taxation, revenue, and expenditure (Chapter 10). Governments throughout history have also, but to varying degree, been involved in economic policy, so we discuss industry and trade, planning and zoning, and—a rather recent complement to economic policies—energy management (Chapter 11). Finally, we discuss the welfare services of government with special attention for health care, education, and social services (Chapter 12). In the final Chapter 13 we will revisit the need for a comparative perspective in a world that is getting both smaller and bigger. More specifically to public affairs, we will reflect upon how the combined global and comparative perspectives help the studies of public administration and political science reach beyond the traditional national orientations.

Concluding Remarks: "Flying" and Comparing across the Globe

Before the Second World War, public administration scholars strived for a genuine science of administration based on the idea that there had to be principles that govern arrangements for human associations of any kind (Dahl, 1947, p. 4). The result had to be a *grand theory* in the tradition of (for instance) Auguste Comte and Karl Marx. Focused on the interaction of social structures and processes as a whole, the problem with "grand theories" is that they are very difficult to test without breaking them into their constituent components (Van Wart and Cayer, 1990, p. 247, note 13). *Middle-range theory* is more modest in its pretensions, since it only (!) concerns one phenomenon. Barrington Moore's study (1993/1966) of trajectories toward dictatorship and democracy is an example of such a middle-range theory. Many middle-range theories are based on the idea that social development converges toward a particular end-state. To give a few examples: Joseph Schumpeter (1996) on the inevitability of the rise of the socialist state,

Francis Fukuyama (1992) on the development toward liberal and capitalistic democracies, and Henry Jacoby on bureaucratization (1976).

However impressive these studies may be, the idea of converging social phenomena is just an assumption—no more, no less. It can neither be proven nor falsified; it is just a starting point and a focus for analysis. It is a rather attractive assumption, as it accommodates the wish to predict. But, as the Arab saying goes, to predict is difficult especially with regard to the future. Another conclusion that can also be drawn from a long list of social scientific research is that, thus far, we have only very limited capabilities to predict human behavior on the individual level, nor are our chances to make adequate predictions for the collective level that impressive. One should be careful therefore with studies such as those mentioned earlier, in which systematic cross-national, cross-time, cross-policy, and sometimes even cross-level comparisons (see Appendix 2 for these four; Peters, 1988) are used to extrapolate into the future. The best that comparative perspectives can offer is an awareness of the differences and similarities of contemporary governments in their respective societies. Cognizant of the similarities and differences between societies and their governments, Pjotr Sztompka remarked that:

> The only reasonable explanation of the divergences of meanings in an otherwise convergent—globalised and internationalised—world is the history of past divergencies; the varieties and peculiarities of unique chains of historical tradition. (1990:56)

Sztompka's observation urges us to connect the comparative and global perspectives with both focusing on similarities and differences. What makes the global perspective different is that it takes the entire world into regard and not one specific region or policy area. It is from that global perspective that we can see "government" emerge in sedentary communities and slowly spreading to all continents, to the point that almost the entire landmass of the world is part of a politically defined community. We develop that global perspective by inviting the reader to "fly" and compare across the globe. In Chapters 2 to 4 we will look at the origins and development of government, seeing it emerge in different parts of the globe and developing in a remarkably similar manner; that is, by controlling the land through territorial circumscription and bureaucratic organization. It is in this sense that convergence is very much part of the historical tradition. At the same time, as Sztompka noted, there were and still are divergencies, and these will be explored in terms of the overall institutional arrangements of the

political-administrative system in Chapters 5 to 8. Chapters 2 to 8 are written at "cruising" altitude: We simply look at the whole world. In Chapters 9 to 12 we "nose" down into countries and policies, and this will make us aware of the extent to which governments face comparable challenges yet resolve these in different ways. We hope you will enjoy this global and comparative voyage and fly to learn how similar yet different governments are.

THE ORIGIN, DEVELOPMENT, AND DISSEMINATION OF GOVERNMENT: STRUCTURING TERRITORY AND ORGANIZATION

THE ROOTS AND DEVELOPMENT OF GOVERNANCE, GOVERNMENT, AND PUBLIC ADMINISTRATION

The Envelopment of Local Communities in Upper-Local Polities over Time

Human life, and thus history, is about association. Theories about rent-seeking and self-maximizing individuals and institutional theories concerning imagined communities do not capture human behavior and desires entirely. Much economic theory assumes individuals to be selfish, but that breaks down in the face of the fact that all human beings associate with some people. In Fukuyama's words "there was *never* a period in human evolution when human beings existed as isolated individuals" (2011, 30; emphasis in original). Historical and anthropological theories assume that individuals are defined by the institutional context in which they are socialized and in which they will stay, but that falls flat when realizing that there is ample evidence of human agency breaking the mold and of people moving away from where they were born. Indeed, according to rabbinical exegesis the divine created people free and thus brought a basic element of uncertainty and choice into the world (Bereshit Rabba 9:4; referenced in Gardet and others, 1976, p. 156).

The earliest human association is nomadic, local, and informal. That is, there are no institutional arrangements beyond kinship and friendship structures. However, we shall see in this chapter that thousands of years before human beings started to record their activities, they became sedentary and created governance structures that could facilitate higher population densities. For much of history, and throughout the globe, political-institutional

arrangements oscillated between city-state and empire levels. Furthermore, until the eighteenth century structures of governance and government not only waxed and waned (for example, "the rise and fall of . . ."), but also the relation between local and upper-local levels of governance and government was equally unsettled. The supremacy of upper-local governing arrangements was not guaranteed, and local communities were often the last resort when upper-local polities collapsed. It is only in the past two centuries, and across the globe, that local communities, both formal and informal, have been more or less permanently enveloped by and embedded in upper-local polities better known as national or territorial states.

In this chapter we discuss types of societal associations and their governance systems as can be found around the globe (Section 1), then turn to the emergence and development of local (Section 2) and upper-local governing arrangements (Section 3). Upon the basis of these sections we present a model of global government development (Section 4). Thus far, the content of this chapter is descriptive, but some attention has to be given to explanations for the emergence and development of government (Section 5). This will demonstrate that a single explanation and/or understanding of one of the most pervasive social phenomena in our time, that is, *an intertwined government and society,* is quite a challenge. Understanding how different governments are today from those as little as two centuries ago provides the foundation for our discussion of the emergence of thinking about government in ancient Greece, which then was mainly political theory about the relation between ruler and ruled. In the course of time, that is when governments slowly but surely established themselves as actors central to any society; this was complemented with attention to government in the study of public administration (Section 6). In the concluding section we will briefly reflect upon how upper-local governments buttressed their claim of authority by means of structuring territorial and bureaucratic organization, a theme developed at length in the next chapter.

A brief set of definitions is necessary before diving into the chapter. First it is important to distinguish governance from government. *Governance* refers to all institutional arrangements in society that are created to address challenges that individual effort and capacity cannot resolve. Hence, governance includes a variety of institutional arrangements as further discussed in Section 1. *Government* refers to all organizations that operate within an institutional superstructure in which sovereignty is invested and where its officials have *the authority to make binding decisions of all people* living

in that sovereignty. By contrast, churches, labor unions, sports clubs, guilds, and so on, are institutional arrangements that contribute to the governance of society, but they are not part of government. Our definition of government is akin to Max Weber's definition of state that emphasizes the state as the only actor that has the authority to use coercion or violence in the administration of the sovereignty. Finally, *public administration* is the term we reserve when referring to the study of government and governance.

Another comment is necessary and that concerns the subtitle of this chapter. The development of government is generally described from top-down and up-time perspectives. The top-down perspective is the one that considers the upper-local, highest level institutions and the elites who populate them. The local level is then regarded as merely an appendage and as fairly insignificant. The up-time perspective concerns the fact that history is reconstructed, thus written in the perspective of the present. This means that only those parts of the past are presented that reinforce particular political, social, and economic arrangements in the present. A good example of up-time reconstruction is the creation and imposition of a sense of national identity and culture in the nineteenth century (Fisch, 2008); indeed, people can even invent traditions and especially do so at times of major social upheaval (Hobsbawm, 1983). In contrast, communal engagement grows bottom-up and history unfolds down-time. In this comparative voyage of governments in the past and today, we emphasize the interplay between local and upper-local levels of governance and government as a theme that has been with people from the moment that city-states became states and empires, that is, since approximately 3,000 years before the common era (BCE).

Types of Governing Associations

People have always lived together in communities, some smaller, some larger. Really small communities will not have formal associations beyond the kinship group that ties its members together. The term *local community* refers to two quite different but related phenomena. First, it is a group of people who share language, customs, and history. If small in size, say not much more then 20/30 to 70/100 people (Corning and Hines, 1988, p. 146; Hallpike, 1986, p. 5; Mann, 1986a, p. 42; Masters, 1983, p. 161; Service, 1967, p. 111), such local communities are referred to as *bands*. Up to roughly 10,000 BCE the band was the dominant type of organization among the nomadic hunter-gatherers (Flannery, 1972, p. 401). Bands may contain

various kinship structures (families, lineages, clans: in that order) and other sub-groups (such as secret societies, cults) (Liverani, 2006). They can be part of a larger, culturally determined whole, but generally living independently (see below: cf. Dunbar, 1993). The !Kung of the Kalahari desert are a good example. Bands generally do not have political institutions that are authorized and/or legitimized by a higher authority. They do have, though, institutions of their own. When bigger in size, say, beyond 150–500 people (Mann, 1986a, p. 143), the term *tribe* is considered more appropriate. These are generally governed by a rudimentary political arrangement such as a council of elders. Tribes can become part of a larger whole, a chiefdom (or paramountcy), yet may live their lives pretty much separately.

Once the population in these local communities grows beyond the size where face-to-face interaction between all members is no longer feasible, and thus has become an *imagined community* (Anderson, 2006; compare Anderson's concept with that of Bertrand Russell's "artificially created societies," 1962, p. 203), local communities tend to formalize their associational life in order to establish accepted modes of interaction for settling collective problems (see Table 2.1). In this second sense, local communities encompass an entire town population (for instance, municipality, city-state) while specific sections of that population may have associations of their own as well (for example, a church denomination, a craft or merchant guild, farmers managing an irrigation system, fisherman sharing fishing rights). It is also possible that the local institutional arrangement merely concerns the management of the natural resource upon which the population depends for its livelihood. In that case the local association is a pure common pool resource management (CPR) system. At some point they can be enveloped by larger political entities, yet remain more or less independent (as was the case with Dutch water boards until the late eighteenth century). Whether specific-purpose local associations actually developed into general-purpose political communities that provided and/ or managed more than one service or natural resource is a matter that requires further research.[1]

Local associations can become part of a more formalized chiefdom without limiting the autonomy of the local units (Spencer, 1990, p. 7) or they can become a city-state with 1,000 up to 100,000 people (in a few cases more) where villages lose their political autonomy to a unifying political

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[1] One example that comes to mind is the institutional arrangements for water management in the Low Countries that preceded the emergence of villages, towns, and municipalities.

TABLE 2.1. TYPES OF GOVERNING ASSOCIATIONS		
	Familial	**Jurisdictional**
Local	Band, tribe; families, lineages, clans, age grades, secret societies, cults	Village, town, municipality, city-state (microstate[2]); CPR-management system; craft and merchant guilds; local interest groups, fraternities; organized religion (church, parish, monastery); homeowners associations; sports clubs, etc.
Upper-local	Chiefdom	Chiefdom (paramountcy); regional government (province, city-state); state (macrostate); regional and national interest groups; labor unions; organized religion (bishopric, archbishopric)

structure (Sanderson, 2001, p. 312). At that point the local political community and the various associations serve as the backbone of an upper-local (regional, and possibly even supraregional) political regime and become the default option when the upper-local polity is in decline.

People nowadays tend to think of local communities as formalized local governments that have jurisdictional boundaries and are part of a larger political regime and sovereignty upon which they are dependent to a smaller or larger degree. These local governments are the backbone of upper-local regimes because their populations supply the financial, natural, and human resources needed to support upper-local regimes. How important they are is illustrated by the fact that an upper-local (can be city-state/ microstate, or regional, or supraregional/macrostate) government that fails to incorporate the local community or governance structures is often destined to disintegrate as shown by the fate of various Mesopotamian polities and, more recently, of African colonies that were governed through indirect rule, of the former Yugoslavia, and the former Soviet Union. If and when an upper-local political regime dissolves, the local associations are left to run their own affairs, at least for a time.

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[2] The distinction between microstates (i.e., city-states) and macrostates (that is, territorial or national states; see Trigger, 2003) is from Hansen (2000a, pp. 15–16).

It is clear that several types of formal local government can be distinguished based on the range of their services, on the extent to which their political institutions are representative of the population, and on the extent to which citizen initiative is allowed and respectively encouraged. General-purpose local governments, such as municipalities, provide a wide range of services, while specific-purpose local governments offer one service or manage one resource only. In many countries, general-purpose governments are the most common and, generally, more numerous than specific-purpose governments. The United States is an exception with its approximately 40,000 specific-purpose governments and 40,000 general-purpose governments (Ostrom et al., 1988), representing a dramatic reduction of both general- and specific-purpose governments in the past 50–100 years. In some Western countries specific-purpose governments are returning (for instance, garbage-collection regions in the Netherlands). Some of these general- and specific-purpose governments represent the local population at large, while others only represent a portion of the population (see Table 2.2).

To understand the role and position of local associations in the emergence and evolution of upper-local political regimes, it is necessary to look beyond the formal local, subnational government units and include local communities, such as bands, tribes, and chiefdoms, that encompass the entire membership as well as those local associations that share governance with the formal local government in the sense that they provide a rule structure for a subcategory of the local community. These subcategories include (see Table 2.1) common pool resource (CPR) management systems, craft and merchant guilds, organized religion, and any other type of local associations.

TABLE 2.2. TYPES OF FORMAL LOCAL (I.E., SUBNATIONAL) GOVERNMENTS

	General purpose	Specific purpose
Representative	Municipalities, counties, provinces	U.S. school boards; Dutch water boards after the 1980s; CPRs
Nonrepresentative	Districts (e.g., in France)	CPRs; Dutch water boards before the 1980s

All Government and Governance Started Local

The literature that engages the question of the meaning of associations in the development of humanity can be grouped into two main categories: political theory on the one hand and evolutionary biology, sociobiology, and anthropology on the other.

Starting with the political theory literature, as far as we know the first author to consider the meaning of local associational life was Alexis de Tocqueville writing about New England townships. In his view these were not so much created as they were born of themselves, "almost secretly in the bosom of a half-barbaric society. . . . The institutions of a township are to freedom what primary schools are to science; they put it within reach of the people; they make them taste its peaceful employ and habituate them to making use of it." (Tocqueville, 2000, p. 57) In the same spirit John Stuart Mill observed that local government was the school for democracy, the level where people first receive their political and civic education (Mill, 1984, p. 378). De Tocqueville was also the first to write that "In democratic countries the *science of association* is the mother science; the progress of all the others depends on the progress of that one." (de Tocqueville, 2000, p. 492; emphasis added)

The views of De Tocqueville and Mill are reinforced in the twentieth century. Arthur Bentley's idea that the interactions of groups form the basis of political life (1908) proved to be quite influential in the pluralist perspective upon politics in political science. In 1962 George Stigler wrote that "An eminent and powerful structure of local government is a basic ingredient of a society which seeks to give the individual the fullest possible freedom and responsibility." (as quoted V. Ostrom, 1974, p. 120). Vincent Ostrom's notion of democratic administration stresses self-governance and polycentricity. He revived De Tocqueville's notion of public administration as a science of association. In his footsteps, Guerrero Ramos (1981, pp. 24–43) called for a substantive theory of human associational life, and Curt Ventriss (1991, p. 7) urged to move toward democratic self-governance. Today we witness increased attention to the meaning of local citizenship and community involvement, again, as the grassroots for nation-level democracy and new types of citizenship (for instance, Clary and Snyder, 2002; Vigoda and Golembiewski, 2001)

Local associations are purposive associations "in which individuals recognize themselves as united or bound together for the joint pursuit of some coherent set of substantive purposes or ends." (Spicer, 2004, p. 355) The concept of purposive association was coined by the British historian

and philosopher of history Michael Oakeshott as referring to the idea of the state, but, as Spicer points out, it can refer to any form of human association.

The political theory concerning the role and meaning of local associations not only acknowledges that such local self-governance arrangements existed but that they are actually vital to the health of the larger polity. Consider the following quote from a study by the historians John McNeil and William McNeil: "we . . . need face-to-face, primary communities for long-range survival: *communities like those our predecessors belonged to,* within which shared meanings, shared values, and shared goals made life worth living for everyone . . . perhaps the most critical question for the human future is how cell-like primary communities can survive and flourish with the global cosmopolitan flows . . ." (2003, p. 326; emphasis added.)

From a different point of view, studies of groups in evolutionary biology, sociobiology, and anthropology are of direct importance to the understanding of local associations. David Wilson and others (2008, p. 7) observe that the group is making its comeback as a unit of analysis; David Wilson and Edward Wilson write at the end of their article that "Selfishness beats altruism within groups. Altruistic groups beat selfish groups. Everything else is commentary." (2007, p. 348) Groups are vital to individuals. Without them the likelihood of survival is significantly reduced. Within any primate group there is status differentiation through the establishment of rank, and this works best with a small group size (De Waal, 1982). When group size increases, primates have the tendency to split into two or more units, and larger groups can only be created through a hierarchical clustering of smaller groups (Dunbar, 1992, p. 485). This finding is also tested and confirmed for human associations. Interestingly, these various groups can be and often are interconnected. Even small hunter-gatherer groups today "live in complexly structured social universes that involve several different levels of grouping." (Dunbar, 1993, p. 685) That is, they live in small groups of 30 to 50 individuals (like an overnight camp) that are somewhat embedded in an intermediate level of 100 to 200 people (such as a more permanent village or a clan or lineage group culturally defined), which, in turn, is part of a large population unit with 500 to 2,500 members and can be called a tribe (Dunbar, 1993, p. 686).

This social order is the result of a bottom-up effort to coordinate actions for survival, such as avoiding potential conflict (Leeson, 2008, p. 69) or searching for food and shelter. After Friedrich Hayek, economists came to call this "spontaneous order" or coordination without command (see also

Tullock, 1994) which seems to be one solution to the tragedy of the commons. Intriguingly, it is then assumed that such spontaneous orders cannot easily, if at all, be replaced by the deliberate creation of some upper-local authority. In fact, efforts to subordinate individuals and their spontaneous order will destroy local coordination (Polanyi, 1951, pp. 35–36, p. 112). Matthew Lange distinguished four ideal types of coordination structures: bureaucratic, associational, market, and clientelist (2005, p. 50). The first is most associated with the national or territorial state and facilitates large-scale coordination. He regards the second as illustrative of voluntary groups. The latter two are coordination mechanisms but less relevant to the central concerns of this book.

So what is the difference between the bureaucratic and associational approaches? Political theorists prescribe the necessity of local associational life, while evolutionary biologists, sociobiologists, and anthropologists describe and explain it. For centuries, and in the slipstream of Thomas Hobbes, it was believed that the only choice people had was that between an absolute state or anarchy. However, local associational life existed throughout the millennia and has been simply overlooked as a basic and foundational set of institutional arrangements important not only for the survival of human groups but also for the endurance of the larger polity. Their centrality and contribution to our understanding of public administration as a study was further recognized with the Nobel-Prize–winning work of Elinor Ostrom on the economic and social features of self-governing associational systems (Ostrom, 2009).

When, how, and why did these local associations and—later—political communities emerge? The first question, when, is fairly easily answered: From about 10000 BCE humankind changed from living in small-scale, egalitarian societies to complex stratified states at extreme rapid speed (Corning, 1983; Hallpike, 1985, p. 136; Roscoe, 1993, p. 111; Massey, 2007, pp. 2–4). The transition from hunter-gatherer and nomadic to agricultural and sedentary society is often referred to as the *neolithic revolution* and involved the domestication of plants and animals, allowing people to settle down and produce a surplus. This encouraged population growth and paved the way for urbanization. Hamlets became villages, and some villages became towns, or small cities, or even city-states. The latter has been defined as: a central state with a surrounding, dependent hinterland within a day's walk from the central town/city (Hansen, 2000a, p. 19). The formation of ever larger political entities is a universal process, since states emerged *independently*, though at different times, in at least six different regions in the world: Mesopotamia, Egypt, India,

China, Mesoamerica, and South America.[3] These are referred to as the pristine states.

Theories about how this happened are, so far, characterized by a focus on processes of increased societal complexity, increased functional differentiation of the political and economic communities, and centralization of political power. Until the early 1980s these processes were explained mainly in terms of unilinear stage models.

Stage models are based on the assumption that the size of political regimes increases over time.[4] The most well-known is the one developed by Elmer Service (1962; 1967, pp. 111–144) who describes political development as proceeding from band, via tribe and chiefdom, to state.[5] While his studies do not focus on the state, it does not stop him from noting that state bureaucracies play a cardinal role in the solution to social problems as well as in the dissolution of political regimes (Service, 1975, pp. 320–321). The bands and tribes mentioned in Table 2.1 are basically undifferentiated political regimes, mainly because their population size is small, their headmen have little formal authority, and they lack an organizational apparatus to help uphold their authority. The state (or empire) is the end-stage in this stage model, and the chiefdom is the bridge between the more or less acephalous bands and tribes and the bureaucratic state (Earle, 1987, p. 279). Writing at about the same time, Robert Fried described social-political development as one moving from egalitarian (such as band, tribe), to ranked (for instance, chiefdom), to stratified (such as state) societies

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[3] On a side note, the British statistician Francis Galton, a cousin of Charles Darwin, posited that universal social laws could only be those that concerned phenomena that emerge independently; that is, whose emergence cannot be explained by a similar development elsewhere. The configuration of domestication, urbanization, and state formation appears to be an excellent example and is, to our knowledge, the only example. Galton's observation hinges on human agency as the source for copying behaviors and social arrangements. That states emerged in various parts of the world without there being any evidence of copying behavior could very well be explained by similarity in environmental changes that were global in scope. The end of the last ice age and the subsequently more favorable conditions for agriculture are an excellent example of that kind of global environmental change.

[4] As far as we know there are no stage models specific to CPR-management systems or other local associational systems; therefore, the following only concerns state and city-state systems.

[5] In all fairness, Service was not the first to describe political development in those terms. That honor must go to Ibn Khaldûn who published in 1377 a history of the world. See ibid. (2005/1967), *The Muqaddimah. An Introduction to History* (translated and introduced by Fran Rosenthal). Princeton/Oxford: Princeton University Press, pp. 91–128.

(1967). Colin Renfrew focused on the chiefdom, a polity characterized as transitional, having a permanent chief who fulfills various functions (military leader, legislator, priest, judge), having fairly clear territorial boundaries, and some degree of redistribution of resources (1973, p. 543; 1974, p. 78). *Group-oriented chiefdoms* have a relatively low level of technology, some craft specialization, and periodic distribution of resources (usually food) on special occasions. *Individualizing chiefdoms* have identified princes (for instance, the Celtic chiefdoms, see Arnold and Gibson, 1995; or the Polynesian chiefdoms, see Service, 1975, p. 150) and a somewhat institutionalized redistributive system (Service, 1975, pp. 74 and 79), but do not have an internally specialized government apparatus (Yoffee, 2005, p. 25; Wright, 2006).

While attractive in their simplicity, stage models suffer from several problems. Jonathan Haas observed that Service, Fried, and Renfrew presented their anthropological stage models as fact, even though they are not supported by the ethnographic and archaeological record (1982, p. 12; see also Claessen and Van de Velde, 1987, p. 3). Christopher Hallpike pointed out that social evolution could not be fruitfully described in stages because social reality manifests itself in multiple configurations, and advocated instead an analysis based on principles or generalizations addressing society's increased complexity.[6]

A second type of critique concerned the centralization bias of stage models, which emphasized exclusionary (i.e., individualizing) strategies in the pursuit of political power and paid too little attention to corporate (that is, group-oriented) strategies (Blanton and others, 1996, p. 2; Haas, 2001b, p. 242). *Exclusionary strategies* for the acquisition of power are usually wealth-based, while *corporate or collective strategies* in the pursuit of power are most often knowledge-based (McIntosh, 1999, p. 17). Tribal societies and their governing arrangements in contemporary Africa, Latin America, Australia, the Middle East, and Oceania, even when embedded in territorial states (see next chapter), are excellent examples of such a corporate or collective orientation. Insofar as tribal societies have multiple centers of power, as is, for instance, the case in Africa (McIntosh, 1999, p. 22), they can be labeled polycentric. Good examples include the Andrantsay in the southwest

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[6] Hallpike, 1986, p. 29. The six principles or generalizations of Hallpike (1986, p. 6) are: increased social network size; social order via simplification of social relations and representations; increased differentiation and specialization of relations and principles of order; people socialized into accepting core principles and inescapable features of their society; selection of certain aspects of the world in terms of these core principles; and capacity for change relative to the creative synthesis of preexisting but unrelated elements.

central highlands of late eighteenth century Madagascar, the Baganda in mid-nineteenth century Eastern Africa, and the Imerina in the central highlands of Madagascar in the late eighteenth century (for these three, see Wright, 2006). But they also include the tribal societies in the mountainous regions of Southeast Asia up to the middle of the twentieth century (Scott, 2009), in the Middle East and the Indian subcontinent (including Pakistan and Afghanistan), and aboriginal groups in Australia to this day. CPR-management systems provide yet another example of knowledge-based, collective communities. However, polycentrism can also exist under exclusionary strategies, of which the feudal European Middle Ages are an example.

A third line of critique is that a linear representation of political development implicitly assumes that smaller units dissolve into larger ones: bands into tribes, tribes into chiefdoms, and chiefdoms into states. However, throughout history smaller units have become part of but did not always, possibly even not often, dissolve into a larger entity. State and tribes not only coexist but they may actually sustain one another, as the cases of Transjordan tribal populations during the Hashemite regime (early twentieth century) (Alon, 2005) and, more recently, of tribal communities in Afghanistan have shown. Acknowledgment of tribal sovereignties in Australia, Africa, and North America in the later part of the twentieth century has strengthened, rather than undermined, the overall claim to sovereignty by the territorial and national state. Also, territorial or national states have started to help settle leadership disputes between tribes and/or acknowledged tribal sovereignty. An example of the former is the 2003 Traditional Leadership and Framework Act of South Africa;[7] an example of the latter is the status of Native-American tribes as sovereign in their own right.

A fourth line of critique concerns the fact that most research has focused on the elites (Brumfiel, 1992, p. 555) and, we add, on the top level of government. Obviously, the activities of local officials are recorded much less than those of their upper-local chiefs and kings, and thus there is much less information available about local associations in general (including historical CPRs) and, more specifically when these existed, of local government bureaucracies. There are some exceptions (Foster, 1982; Wright and others, 1969;

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[7] Upon this act, the South-African government is authorized to settle disputes about tribal leadership. This was done, for instance, recently for the Bapedi tribe. The Bapedi was a paramountcy since the sixteenth century that had become a kingdom in the 1790–1820 period; because several lineages claim the leadership, the state had to mediate.

Walters, 1970) and there may be more, but we will not know until the many clay tablets still awaiting transcription have become available.

Given the focus on top government levels and their elites, political change has often been conceptualized as a "rise and fall of . . ." (fill in the blank) with little, if any, attention to the fate of the various local communities and associations. Perhaps they were in turmoil once the upper-local regime folded, but perhaps they were not. So complete is the focus upon the rise and fall of upper-local political regimes that the continuity provided by the local communities and associations is overlooked. Indeed, there is evidence throughout history that local communities and associations were vital to society. For instance, in ancient Sumer the governing body of a village (for instance, the *abba ašaga* or field fathers) continued to function when the assembly of city rulers (*unken*) chaired by a "big man" (*lugal*) responsible for adjudicating disputes between city-states and for deciding on peace and war, disintegrated because of some natural or man-made disaster (Westenholz, 2002, p. 27). There is no reason to assume that it was different elsewhere. Archaeological research has shown that the notion of a "dark age"[8] in Ancient Greece between the twelfth and eighth centuries BCE and in Europe between the fall of the Roman Empire and the flash of the Carolingian empire is much overstated. Also, no matter how upsetting events during the French Revolution or the Third Reich were, there was much continuity not just in terms of elites continuing in office, but also at the local associational level. It is upon the latter's continuity that upper-local political regimes could rise and fall. To be more precise, a local regime could grow its sphere of influence via conquest, amalgamation, or otherwise and become, temporarily, the center of an upper-local polity at regional (chiefdom) or a supraregional polity at an even higher level (state, empire).

The Emergence of Territorial States as Upper-Local Polities

It makes sense to conceptualize political development as a process where (a) local regimes temporarily achieve paramountcy or even kingship status over neighboring local regimes, (b) that sometimes became semi-permanent, because they successfully incorporated local officials in the administration of the larger realm and managed to tie local populations to

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[8] The "dark ages" concept generally refers to a period in which few, if any, literary sources are left testifying to human activity.

the center through, for instance, redistributive policies and rituals. Logically, upper-local regimes generally do not come out of the blue. In fact, very few upper-local political regimes started at the upper-local level (among the few exceptions: Scandinavia during the Viking Age, and early Anglo-Saxon England). Most political regimes, and the changes in them, started locally, whether as a territorial polity or as a political movement. For much of history, political regime change also involved the change of the territorial center and the political superstructure. *It is only in the past 200 years or so that political regime change generally does not involve changes of the political superstructure, changes in the circumscription of the sovereignty, or changes in the location of the center of power.* An exception to this rule can be made for political regimes whose institutional superstructure was imposed by outside forces (for instance, colonial government; Germany and Japan after the Second World War) or was changed by internal regime change (for instance, from dictatorship to democracy). No matter how vehemently executive and legislative elections are contested in democracies, in the light of history regime change today is relatively peaceful.[9]

Many singular explanations for the establishment of a sedentary lifestyle and for the emergence of the state have been suggested. The archaeologist Vere Gordon Childe argued that urban and technological development accounted for this (1942). The historian and sinologist Karl Wittfogel suggested that irrigation prompted the development of states (1957). The demographer Esther Boserup believed demographic development (such as population size and density) to be a prime mover (1965). Others emphasized the domestication of agriculture and animals. Several scholars emphasized conflict and expansionist warfare (for instance, Carneiro, 1970) such as in the warring city-states of Mesopotamia, while others stressed the need for defense (Gat, 2002, pp. 127 and 131; pointing especially to pre-colonial Africa and early Mesopotamia). Yet others have suggested trade and even the integrative power of religion and art (Flannery, 1972, pp. 404–407).[10]

All these explanations suffer from incompleteness and single-mindedness, and as the stage models were left behind, scholars increasingly turned to the importance of multivariate explanations that could tackle the

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[9] In a situation of colonization or of civil unrest (think of the Arab spring 2011–2013), regime change is obviously not regarded as peaceful by the indigenous population.

[10] Excavations at Göbekli Tepe, a temple complex dating back to 9500 BCE in southeastern Turkey, have prompted the lead excavator, archaeologist Klaus Schmidt, to suggest that the need for worship brought people together, and that religion is a cause rather than a product of culture (*Newsweek,* March 1, 2010).

variation in governance structures in relation to the local physical circumstances (V. Ostrom in Toonen, 2010), that, thus, conceptualized social evolution as multilevel, configural, and interactive (Corning, 1983, p. 13; Corning and Hines, 1988, p. 147; Elias, 1987), recognizing that cultural diversity is a function of distinctive social environments and subsistence patterns (Yoffee, 1979, p. 8). Instead of simplifying social reality through stage models and singular explanations, emphasis shifted since the 1980s to capturing the institutional diversity that has characterized humankind's government and governance since the beginning of history.

This is a daunting task for several reasons. First, Weber was one of the earliest scholars to point to the impossibility of singular explanations: "how can causal explanation of an individual fact be possible . . . the number and nature of causes that contributed to an individual event is always infinite." (Weber, 1985a, p. 177; author translation) Almost a century later Fritz Scharpf pondered the same: "the potential number of different constellations of situational and institutional factors will be extremely large—so large, in fact, that it is rather unlikely that exactly the same factor combination will appear in many empirical cases." (as quoted in E. Ostrom, 2005, p. 10) Second, to complicate matters further, the variation is not just between different societies and/or political regimes but also within. The use of orderly flowcharts and formal organizational structures implies that society is a well-integrated, adaptive, and not so complex system. Instead it is "a continually shifting patchwork of internally differentiated communities bound together by interacting contradictions and mediations." (Brumfiel, 1992, p. 558) And this institutional diversity can only be explained by combinations of variables (Wright, 1977; Claessen and Skalnik, 1978, p. 625). Third, research into the emergence and development of the state suffers from having both too many as well as too few sources of information. We have an enormous amount of information about the past eight to 10 centuries in Europe, thanks to the meticulous conservation of printed matter in archives. There is much less information about the millennia before. At the same time, the potential for information about the ancient past is large. Henry Wright and others noted that about 16,000 economic texts from Ur III had been published, but that many more are stored in museums around the world (1969, p. 99). John Brinkman reported in 1972 that about 900 Kassite tables had been published, but that more than 11,000 still waited transcription (p. 271). Several years later Robert Wenke wrote that decades of intensive research would be required to tackle the "physical scale of the archaeological record." (1981, p. 118) In fact, archaeologists continue to complain about the lack of time for assessing and coding

available sources (Wright, 2006, p. 1). Nevertheless, enough has been translated and discovered that examples can be provided to substantiate the claims made previously.

A Global Model of Government Development

As noticed earlier, the dominant model of political evolution has been linear, either emphasizing a process of continuous growth of territorial and population size in the abstract (see Ibn Khaldûn; Service), or focusing on the rise and fall of political regimes (for instance, Gibbons' *The Rise and Fall of the Roman Empire*). When looking, though, at the historical record, several patterns of political evolution can be distinguished (see Figure 2.1). The traditional focus on "rise and fall" is pictured in Figure 2.1 as (a), where the focus on the state/empire stage allows less attention to the "rise" (therefore a dotted line) and assumes a "void" after its "fall" (another dotted line). More common for much of history is a trajectory (b) where bands form a

FIGURE 2.1. A MODEL OF POLITICAL EVOLUTION FROM A BOTTOM-UP PERSPECTIVE[11]
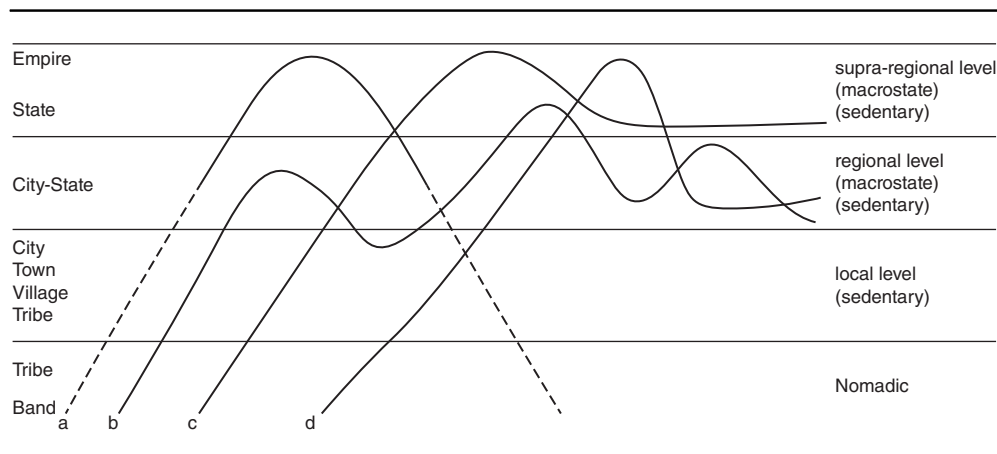
[11] This figure was inspired by the dynamic model of Kent Flannery (1998, pp. 62–90), who focuses on increasing and decreasing polity size, and the model by Ingolf Thuesen (2000, p. 65) of cycles in political development of city-states in ancient Western Syria (distinguishing town/village A, city-state B, city-state empire C, and foreign control/empire D).

tribe, where tribes settle, and where at some point such a settlement becomes a city. Some of these cities may start to dominate their immediate surrounding areas and become city-states, at least for a while. Such a city-state may lose its authority to another. Especially up to the early modern age, it is quite common that city-states wax and wane, hence the "wavy" line. City-states and city-state cultures can evolve into full-fledged macrostates, the last "bump" in (b), and there are several examples of these. The situation pictured as (c) represents the unbroken development from a small political community to empire, which represents the traditional linear theory of state development. Sometimes these empires fragment into states almost immediately (think of the Carolingian Empire) or after a while (think of the Roman Empire, the Ottoman Empire, the Soviet Union). Equally common is the situation of evolution toward a state or an empire and fragmentation of these into states or city-states, which is pictured as (d). Other trajectories are conceivable.

This graphic representation only visualizes political development; it is not and cannot be an explanation. Perhaps the use of linear models prompted the search for prime movers of social, cultural, and political development. However, as stated previously, social evolution is a function of human agency in response to environmental circumstances and change, so that descriptions of social evolution can only be multilevel, interactive, and configurational. Looking at a periodization of the past that takes the interplay between local and upper-local levels of government and governance into consideration, there really are only three phases in the development of government and the state:

1. Pre-8000 BCE: *the hunter-gatherer phase* with nomadic, small bands. This is the period that Scott (2009, p. 324) called the stateless era.
2. From 8000 BCE to 1800 common era (CE): *the experimental phase* with associational arrangements at the local level oscillating between and/or mixing special-purpose associations and general-purpose organizations, and with varying relations between local associations and governments on the one hand, and with varying relations between local associations and government with upper-local levels of governance on the other hand. These horizontal and vertical types of relations and interactions varied over time in terms of intensity and extent. Scott (2009) distinguishes two periods: One represents an era of small-scale states encircled by vast and easily reached stateless peripheries, and the second is one where the localities and peripheries are permanently encroached upon by the expansion of state power. The latter happened

earlier in Western Europe than anywhere else, and the process whereby virtually the entire territory was securely enveloped by and embedded in the territorial and bureaucratic framework of the state was not completed in parts of Southeast Asia and central Africa until after the Second World War.

3. Since 1800 CE: the *centralized governance phase* where general-purpose subnational governments and national, regional, and local single-purpose associations are closely intertwined within a jurisdiction that is circumscribed by the central level. Scott (2009) notes that this is the period when almost the entire globe is "administered space" and where the periphery is reduced to being a folkloric remnant. Perhaps we should consider a fourth phase because since the Second World War decentralization of tasks and services has been widespread, while at the same time governments and societal associations increasingly rely on international organizations (e.g., United Nations [UN], International Monetary Fund [IMF], European Union [EU], North American Free Trade Association [NAFTA], North Atlantic Treaty Organization [NATO], and so forth) for specific services.

Mapping the role and position of the government and associations of local communities in the history of associational life in their interaction with and relation to upper-local political and associational arrangements is very ambitious and may never be complete. Intuitively, human societies are, on the one hand, multivaried in their functioning and in their relation to the physical and sociocultural environment but, on the other hand, quite basic and simple in how they are structured in terms of demarcations of labor/office, of territory, and of single respectively compound functions (see for this Chapter 3).[12]

We can only find examples of the rudimentary theory presented previously when we step away from the notion that the development of government has to be characterized as a process that (a) was linear, (b) involved continued centralization, and (c) required continued refinement/elaboration of organizational and societal hierarchy. In the light of history all three assumptions are wrong.

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[12] A systematic case-study approach that builds upon examples of local associational and government development from all continents is likely to substantiate the thesis that the associations and governments of local communities are the backbone for and default of upper-local/regional and supraregional political regimes.

The existence of the centralized state is, as Yuwa Wong observed (1994, p. 5), neither "natural" nor easily explained. That is, the dominance of centralized states in the world today, including loosely coupled federations, is hard to understand when considering the inherent desire of people for some degree of autonomy and certainly for belonging to a face-to-face community. People need self-government (see de Tocqueville, 2000; Mill, 1984), polycentricity (V. Ostrom, 1991), and *autogestion* (Lefebvre; see Brenner and Elden, 2009) at the grassroots level. Sustained centralization has generally been a feature of the past two centuries, and the loosely coupled empires of old have disappeared. However, there have been centralized systems in the ancient world such as during various periods and dynasties of ancient Egypt (Blanton, 1998, p. 147) (with regard to Egypt: think of the intermediate periods during 2150–1980, 1630–1520, 1070–715 BCE) and for most of China's history. Totalitarian regimes are hypercentralized as well, but even there the intensity of centralization waxed and waned during the time of their existence.

With respect to organizational structure, when confronted with a growing workforce, organizations have to differentiate horizontally (in terms of number of units) and vertically (in terms of tiers of hierarchy) to lower the span-of-control while maintaining a clear line of authority with unity of command (Raadschelders, 1997). In the past 150 years or so people are inclined to think in terms of fairly clearly delineated job functions where overlap is avoided. Before the 1800s collegial organization was quite normal in most general-purpose governments from the middle management level up, and job functions were not clearly demarcated. Nowadays, any collegial type of organization in formal governments, i.e., a body of people fulfilling one function together, has been limited to the top level (i.e., that of elected officeholders in the legislatures and executives). In many local associations, though, management is likely to be organized on a collegial rather than a hierarchical basis.

The linear thinking visible in the notion that bands were superseded by tribes, tribes by chiefdoms, and chiefdoms by states is, as mentioned earlier, not supported by facts. As it is, bands, tribes, chiefdoms, and states can and have coexisted (see previous examples). Another example of "hierarchical" thinking is Walter Christaller's central place theory (1966) that identifies a hierarchy of hamlets, villages, towns, and cities based on their economic catchment area, that is, their zonal influence (how much are they a motor for the regional economy?) and their nodal influence (how attractive are they to the surrounding area?). However, such a presentation inhibits the recognition that settlements may have very different functions, and that

one town/city may be a second-tier political center but a first-tier religious center, while another is a first-tier craft production center but only a fourth-tier political center (Marcus and Feinman, 1998, p. 11). In addition to this, Mogens Hansen observed that the urban studies literature suffers from lack of attention to the political aspect of urbanization (2000b, p. 606). Perhaps contemporary societies and their governments can be conceptualized as hierarchies in themselves (local, regional, national) and in relation to each other (first, second, third world), but up to the premodern world (say, around the 1500s in a European biased chronology) a combination of hierarchy and heterarchy captures reality far better (Crumley, 1995, p. 3).

Now we can turn to the question, what happened with local associations when the upper-local political regime collapsed in which they were embedded? First, this question can be answered by pointing out that it only rarely happens that a local community vanishes without leaving a trace of what contributed to their demise and to where they went. The fate of the Maya city-states can only be guessed, and it is rare that subsequent civilizations have no memory of what happened. We know what happened to Carthage, but complete destruction of a local community is fairly rare as well. More common is that local communities and their associations continue to survive, or relocate when under threat. When the people of Aquileia in northern Italy felt threatened by the Lombard invasion in 568 CE, they fled south and settled on Torcello, a low-lying offshore island in the northern Adriatic. In time, it would become the independent and very powerful city-state of Venice. The city of Lagash in ancient Mesopotomia was sometimes an independent city-state, while at other times it was subordinate to other city-states (e.g., Kish, Akkad, Ur) (Flannery, 1998, p. 20). Indeed, the history of local governments and their associations, such as the lowland Maya, the central Mexican states, the Andean states, the Mesopotamian (city-) states, and the ancient Aegean polities, has been described as a repetitive cycle of consolidation, expansion, and dissolution (Marcus, 1998, pp. 60, 62, 68, 73, 75, 80, 88, and 90). Specifically with regard to city-states, Hansen (2000b, p. 611; 2002, p. 8) pointed to three different patterns:

1. city-state cultures that emerge only once in history, such as Hellas (750–550 BCE), northern China (780–480 BCE), Nigeria (fifteenth to nineteenth century CE), and Nepal (1482–1768/9 CE);
2. in some regions city-states disappeared and reappeared with a "dark ages" in-between, such as the Syrian city-state cultures (3500–500 BCE), the Palestinian city-state cultures (2900–1200 BCE), and the Hittite city-state culture (1200–700 BCE);

3. in some other regions two periods of city-state culture were separated by the formation of a macrostate. The Sumerian city-states (3500–2300 BCE) were followed by the Old Babylonian Kingdom (1800–1600 BCE) and the Kassite monarchy (1600–1200 BCE). When the latter disintegrated, the Neo-Babylonian city-states reemerged (1200–800 BCE); the Etruscan/Italian city-states (ninth to fourth century BCE) were enveloped in the Roman Republic and Empire (fourth century BCE to fourth century CE), which disintegrated under the threat of the German migrations. Another example is that of the Maya city-states separated by the Mayapan state 1150–1450 CE).

The latter two scenarios are especially interesting because they indicate sufficient local community vitality, and thus invite exploration of the sources of this vitality.

In a dynamic model of political development, the demise of one particular regime does not necessarily coincide with the decline of a culture. Consider that the notion of "the rise and fall of the Roman empire" implies that political dissolution and cultural dissolution were concomitant. However, that Rome lost control over most of its territories did not mean that all of its accomplishments went down with its political control. The best illustration is that the Roman church, whose Christianity became the state religion upon Emperor Constantine's decision in 312 CE, used the existing Roman municipal and provincial jurisdictions to define the boundaries of its parishes and bishoprics (Raadschelders, 2002, p. 10), and they also took over the provision of services such as health care (the Roman military hospitals) and water supply (aqueducts). Both the areas of Mesopotamia and of Christendom are excellent examples of the fact that political boundaries do not always, and certainly not before the premodern period, coincide with cultural or even economic boundaries.

The Development of Thinking about Government: From Political Theory to Public Administration

The topic of political and jurisdictional boundaries in relation to the cultural and economic boundaries across the globe will be discussed further in Chapter 3. In this chapter the theme of territorial states as enveloping local governments and associations requires attention for how people thought about government during that process of increasing intertwinement with society. After all, at some point—sometimes sooner, sometimes

after a while—some people will start musing about a phenomenon that had been emerging but they had not yet become aware of. We can pretty much safely assume that at the time of the Neolithic Revolution people had little if any conception of the momentous change involved with substituting nomadic for sedentary life. We can also assume that in the early days when villages and towns were enveloped by city-states or even empires, people did not conceptualize and theorize about political development. Living in larger, imagined communities made some people realize that some type of order was necessary to substitute for the social control assured by relations of kinship and friendship. Hence it was that Egyptian, Mesopotamian, and Chinese rulers issued laws, and these were embedded in a more encompassing, if not always explicit, theory of state and of state-ruler relations such as the Chinese Mandate of Heaven (since the Zhou dynasty of the tenth to the third centuries BCE). Some rulers and their aides restructured the territory they governed, but did so without an overarching theory of state and of state-ruler relations.

The first documented theories about state and state-ruler relations can be traced back to the studies of Plato and Aristotle in Greece and of Kautilya in India. They came to theorize about government and its relations with the population at a time that government had become a well-established, if not stable, phenomenon in—what they regarded as—the civilized world. Their theories had two components. One element concerned the ideal structuring of the state, including and most literally what the ideal city and ideal territorial organization would look like. The second element concerned the ideal relation between those who govern and the governed.

Greek ideas about the ideal city amounted to designing the living space as a grid, carefully outlining the streets and neighborhoods around the center with its market square, temples, and other public buildings. Each neighborhood had a water pump. The works of Plato and Aristotle on the design of cities would continue to influence later thinkers, such as Simon Stevin in the Dutch Republic. Another example is the grid-like design of the American landscape beyond Ohio in the 1785 Northwest Ordinance. Other than that, they did not have a conception of territorial organization beyond the city-state. Aristotle's study of "constitutions" in the Mediterranean area, though, amounted to nothing less than a first consideration of the foundations of any society. Kautilya, writing in the third century BCE and during a time that the Mauryan Empire was established in India, did spend time on designing an ideal overall structure and placed the various kingdoms in it, describing in detail a layering of governing structures from the local up to the kingdom level.

Both the Greeks and Kautilya, though, were primarily interested in the ideal nature of the relationship between ruler and ruled. To Plato the ideal ruler was a philosopher-king, a wise person, educated over decades, having held various lower public offices before being called to the highest office. They were patricians, the guardians of society. This type of literature also found its followers, the most cynical or realistic of whom, perhaps, was Niccolo Machiavelli. Well into the European early modern age, thinking about government was, thus, sometimes about planning and zoning and mostly about the ideal ruler who was the embodiment of government. Hence, we argue, that thinking about government was political theory well into the seventeenth century.

The first book that went beyond describing the relation between ruler and ruled and the ideal living space was written by Veit Ludwig von Seckendorf in 1656. In his *Teutscher Fürstenstat* (i.e., German Princely State) he laid down in detail the various tasks, services, and activities of governments. Some 70 years later Nicolas De la Mare published his *Science de la Police*. The study of public administration was born in the slipstream of an expanding state where the ruler no longer personified state and government, and was thus standing above the law and was the source of law, but was "merely" a servant of the state. The development of the study of public administration in the context of increasing awareness of *Raison d'État* since the sixteenth century, of *Rechtsstaat* since the nineteenth century, and of administrative state since the twentieth century, has been described in some detail elsewhere (see Raadschelders, 2011b, pp. 12–19). The central point, though, is that the study of public administration as we know it emerged when the state slowly but surely expanded its activities beyond the traditional focus on defense, law and order, and taxation (see Appendix 1). The late seventeenth and eighteenth century public administration was above all a practical study that not only considered various policy areas, but also included attention to archiving, types of correspondence, and so forth. In the nineteenth century, the study of public administration was—in retrospect, temporarily—subsumed in the study of law and/or of political science. With the emergence of welfare state policies in response to the "triple whammy" of industrialization, urbanization, and population growth, the study of public administration once again came into its own and would develop into the vast field of study it is nowadays.

Comparing Government Models: Concluding Remarks

Clearly this book is not the place to describe in detail the origins and development of the study of public administration, but people did start to

theorize about government once it had become the substitute for a societal life that had been characterized by and governed through small groups. The structure and functioning of today's governments have no historical precedent. While the people who work for government and sometimes even "run" government today suffer from the same human conditions as their ancestors (take your pick: desire to do good, desire for power, greed, corruption, etc.), they work in a government that is fundamentally different from that even 150 years ago. It cannot be said enough that *government is the only actor left that can make binding decisions on behalf of the entire population.* In the course of history, it took at least six millennia to settle on a particular type of governance for imagined communities: a state generally larger than a city-state but smaller than an empire, that has internationally recognized boundaries, that has an elected government with supporting bureaucracies, and that has territorially defined subdivisions from the local up to the national level. In that process of state making, the local level, so vital to the immediate needs of all people, was absorbed into a national polity. We will not say that the local level has been somewhat permanently absorbed into a well-defined upper-regional polity whose sovereignty is recognized in terms of international law. But, for the moment, the fact remains that the entire globe, excepting Antarctica, is part of a state. The territorialization and bureaucratization that made the state the most dominant type of polity in the world will be discussed further in the next chapter.

STRUCTURING GOVERNANCE AND GOVERNMENT

The Layered Territorial and Bureaucratic Organization of the World

The territorial boundaries that crisscross the earth's landmasses do not represent cultural and economic boundaries. People, however, are very much inclined to think of, say, Argentinian, Australian, Canadian, Chinese, Egyptian, German, Indian, Israeli, and South African culture as something that is circumscribed by borders, thus almost equating culture and country. Within these borders people are governed by political systems shored up by bureaucracies. What seems the normal situation today really spread from a small part of the world across the globe only about 200 years ago, and it was not until after the Second World War that the earth became almost totally "administered space" (Scott, 2009; see previous chapter and below) and did so at an astonishing speed (Lefebvre, 2009, p. 96). Territoriality and bureaucracy are closely intertwined everywhere. Indeed, territoriality and dominance hierarchies are the two major features of social life in many species (Dawkins, 2006, p. 113). Except for the few city-states remaining (for instance, Monaco, San Marino) and for small island states (in the Pacific and the Caribbean), most countries are territorially layered from the local up to the national level. At each of these levels, bureaucratic organizations can be found that provide services and help elected officials to flesh out policies. It is common to think of territoriality and bureaucracy in relation to the state, but elements of both existed before the state did. In this chapter we will look closely at the development of territorial and

bureaucratic organization over time, and we will see how the historical trend has been one of convergence toward the territorial (national) state with expanding bureaucratic organization at each jurisdictional level, and this is in part a consequence of the colonization of the world by a few European countries.

In Section 1 we will define and discuss features of territoriality in relation to property, thus setting up the framework within which we can understand the territorialization of the world (Section 2). Territorialization has both international and domestic elements. Internationally, it concerns the demarcation of boundaries between countries (Section 3), while domestically it is evident in a layered, nested system of subnational jurisdictions, i.e., a system of multilevel government. In Section 4 we will describe the historical development of subnational jurisdictions, while in Section 5 we pay attention to the contemporary situation. In Section 6 we briefly discuss bureaucracy as organizational structure and focus on its emergence and development over time and pay attention to the fact that bureaucratization is not something that is limited to large organizations. Indeed, one can say that society and the world have bureaucratized as well. (Nota bene: In Chapter 6 we will discuss Max Weber's ideal type insofar as it concerns organizational structure, and in Chapter 8 we shall outline those elements that concern functionaries.) While land has been territorialized, and while elements of bureaucracy have been around since prehistory, that countries around the world have settled upon a rather similar style of territorializing and administering their land requires a discussion of colonization (Section 7).

Territoriality and Property

Perhaps one of the earliest observations about the meaning of and relation between territory and property is that by Jean-Jacques Rousseau, which opens the second part of his discourse on inequality:

> The first man who, having enclosed a piece of ground, bethought of himself of saying 'This is mine', and found people simple enough to believe him, was the real founder of civil society. From how many crimes, wars, and murders, from how many horrors and misfortunes might not any one have saved mankind, by pulling up the stakes, or filling up the ditch, and crying to his

fellows: 'Beware of listening to this imposter; you are undone if
you once forget that the fruits of the earth belong to us all, and
the earth itself to nobody.'   (1986, p. 84)

This is a very interesting observation. When people do not regard the
earth as a property, it is simply a commons from which they take what is
needed to survive. This is how most, and probably all, indigenous peoples
"used" the earth and they still do so; to them the earth is not a property that
can be bought and sold.

Rousseau's observation points to a commodification of the earth, and this
happened when people shifted from nomadic to sedentary life, thus well
before they started recording their activities. From Rousseau's remark we can
infer that territorialization is a social act, for it is established in interaction
between people. Second, it also suggests that people living in sedentary
communities with a population size larger than what can be effectively
monitored on a kinship and friendship basis will operate upon, at first, an
implicit, later an explicit system of social stratification (Massey, 2007). After all,
no one objected to that one individual claiming a piece of land as his property,
and we assume this is because he was considered superior in some respect.

The most commonly used definition of territoriality is that by Robert Sack:
"the attempt by an individual or group to affect, influence, or control people,
phenomena, and relationships by delimiting and asserting control over a
geographic area." (Sack, 1986, p. 19) We find a comparable emphasis on
"control" in the definition by Alan Buchanan and Margaret Moore: ". . .
territory refers to the area or domain of jurisdictional authority of a ruler
(in monarchical systems) or of the people who are conceived as sovereign
(in democratic systems)." (2003, p. 328) The latter definition emphasizes that
territory is not to be regarded as private property for two reasons. First, territory
is the land where a community of people lives and since that territory is
constitutive of that people's identity it cannot be treated as a commodity; that is,
the community does not "own" the territory. In a way this is reminiscent of how
indigenous people view the earth as a commons. Second, private property can
be acquired within a system of rules that is established by those in power, while
territory circumscribes the area where those rules apply. Both these reasons
apply to the sale or purchase of a territory. It is a somewhat different matter
when territory is inherited; that is, when jurisdictional territory could be passed
from one monarchical ruler to another or could be combined with other
territories as in the case of dynastic marriage. To be sure, though, a ruler was
not at liberty to simply cede territory (Buchanan and Moore, 2003, p. 330).
That too underlines how territory cannot be treated as private property.

Territory is an important resource in the struggle for power and status and is therefore open to political manipulation. It also buttresses claims of authority, and the higher population density is, the more that existing patterns of authority will be reinforced (Merelman, 1988, pp. 579–582). Richard Merelman argues that authority is constrained by community, implicitly suggesting that authority travels top-down and is associated with the state while community functions bottom-up as it embodies localities (p. 586). Indeed, states compete with substate groups, communities, and individuals who seek some degree of control over land and resources (Peluso, 2005, p. 2), and they do so especially when local claims predate state claims (Wadley, 2003). States and their governments formally map territory, but these can be met with countermapping, which is when locals map village territories as they did in West Kalimantan, Indonesia. These countermaps became maps of power when authorized and used by regional and district authorities (Peluso, 2005, p. 12; for the importance of maps for defining territory, see Anderson, 2006).

In many places in the world formal jurisdictions represent a mix of state and local maps and practices, tying state and localities together. Once the rights to resources are territorialized and mapped or documented by the state, the state gains a certain power over those resources and the people claiming them. The state then manages the territory as eminent owner, superimposing its rights and power over the rights of locals. Henri Lefebvre suggests that centralizing state power results in neglect of the peripheries, the margins, the regions, the villages, and local communities. His *autogestion* or self-government denotes popular democratic control over spatial areas or jurisdictions (as discussed in Brenner and Elden, 2009, pp. 360–361). In a recent study the anthropologist James Scott argued how the great majority of humankind operated for millennia on the basis of self-governance. Zomia (from *zo* = remote and *mi* = people) was the name he gave to the mountainous regions of Southeast Asia that included parts of India, Burma, China, Vietnam, Laos, Thailand, and Cambodia. Until the mid-twentieth century the local communities in these remote mountains were able to resist the encompassing and invasive power of the state, removing themselves from the effective control of the state. Thanks to technologies that pretty much demolished geographic distance (rail, all-weather roads, telephone, telegraph, airpower, and information technology), ever-larger parts of the globe have come in the state's sphere of influence. By the second part of the twentieth century even the remotest territories were effectively incorporated in and by the state.

We mentioned previously that territory is an important source of power and status, so we must ask why rulers territorialize. Peter Vandergeest and Nancy Peluso provide three motives. First, rulers are interested in protecting access to people and income from taxes and natural resources, especially in a world where only territorial claims are regarded as legitimate. Second, territorialization allowed for improved efficiency in the collection of taxes, both in terms of volume as well as regularity. Third, at the same time, territorialization is only possible when there is a sufficient level of commercialization and increased ability to extract taxes on a regular basis, in order to pay a regular salary for the officials administering the territory through their bureaucracies (1995, p. 390).

A pattern of territorialization can be discerned, from small to larger territories, and this involves a variety of tendencies (the following based on Sack, 1986, pp. 32–34). First and foremost is that territoriality classifies a specific area or a location in space. The boundary is, second, often easy to communicate by means of markers or signs. Third, it is the most efficient way that rulers can exercise and enforce control. Fourth, given that territory is a source of power, it is a means to reify power. At the same time and when possible, rulers do not like to be seen as those who forbid, so territoriality, fifth, moves attention away from the interaction between ruler and ruled and directs it to "the law of the land." Sixth, it also makes relations impersonal, clarifying who "belongs" where in the imagined communities of the past and today. Seventh, territoriality is also a neutral means to define place and make it permanent through property rights. An eighth feature is that it contains or shapes spatial properties of events, such as when a specific subnational unit receives national help in times of emergency. Ninth, territoriality also helps define empty space, such as an area without any socially or economically valuable features (e.g., a vacant lot in town). Finally, tenth, territoriality may help establish more territories.

The major historical trend is that the total number of territorial units has declined enormously since prehistory. Edward Deevey (1960; as referenced in Sack, 1986, p. 52) estimated that there may have been about 3 million people on the globe in the Upper Paleolithic (between 50,000 and 10,000 years ago) divided among some 100,000 or more independent, small units. After 10000 BCE the size of autonomous units increased, while at the same time each of these autonomous units became increasingly subdivided and fragmented into various types of territorial subunits. We shall see in Section 4 that territorial subunits became important from about 3000 BCE on.

Territorialization of the World

Territorialization is generally a slow process. We tend to think that it spanned many centuries in Europe and North America, and was accelerated elsewhere because of European claims on major territories in every continent (Vandergeest and Peluso, 1995, p. 391). But wherever people started living together in groups larger than those that could be "governed" on the basis of kinship and friendship, some type and degree of territorialization occurred. The one dominant for most of history is a somewhat loose or flexible territorialization, with people recognizing that they "belong" to a territory of which the geographic boundaries are flexible and subject to the consequences of migration. That is, when people "migrated or expanded to new territories, the boundaries often expanded or migrated with them . . ." (Vandergeest and Peluso, 1995, p. 394) Most important, geographic boundaries framed rules about and rights to resources for the people residing within. Today, the most dominant feature of territorialization is its inflexibility, especially with regard to boundaries between states.

Next to flexible and inflexible territorial boundaries, there are other differences between modern states and governments on the one hand and their premodern predecessors on the other. Before the modern era, the central feature of administration was that it was usually based on control of labor rather than of land, and this was expressed in at least three ways (Vandergeest and Pelosu, 1995, p. 392). First, political units before the modern era were identified and classified by ruler and ruling center, not necessarily by territorial boundaries. Second, if there were boundaries they were not communicated to the people by means of mapping the territory, but by defining access to the territory's resources. Third and related to the first element is that rulers used their coercive capabilities not to impose territorial claims but to demand labor (for instance, for the construction of large, monumental architecture), and/or the products of labor (as taxation in kind), and/or the lives of people (as in the case of conscription to military service).

There is a fourth element (based on Van Caenegem, 1967, p. 98) that involves the basis of law. For much of history people were judged according to the law of the tribe or community to which they belonged. This is known as the *personality principle* of law, and this meant that one could only be judged and punished on the basis of the law of one's own tribe. In other words, the influence of tribal law extended beyond tribal territory. This lasted in, for instance, the territories that today are France and Germany until the tenth century CE, and was slowly replaced by the *territoriality principle* whereby one was judged and punished on the

basis of the law of the territory where the crime or transgression was committed. In this situation the law of a territory did not stretch beyond its jurisdiction. In the course of the nineteenth century the *passive personality principle* emerged, which is the situation where a country exercises jurisdiction over a foreign individual who harmed one of its citizens outside of its territory (see also McCarthy, 1989, pp. 300–301; Murphy, 2006).

How territorialization unfolded can best be illustrated by describing the situation at the dawn of history and then look at a real case, namely that of territories in Southeast Asia, and Thailand more specifically, since it captures quite well the situation in the world at other times and in other contexts (unless otherwise indicated, the following is based on Vandergeest and Peluso, 1995, pp. 392–401; and Scott, 2009, p. 36).

Scott made a convincing case when arguing that for most of human history the social landscape consisted of elementary, self-governing kinship units that every now and then cooperated in hunting, feasting, skirmishing, trading, and peacemaking (2009, p. 3). A good example would be the Wintu, a people living in northern California and engaging with surrounding tribal units, undisturbed until the 1830s–1840s (Chase-Dunn and Hall, 1997, pp. 126–148; Chase-Dunn and Mann, 1998). There is no reason to believe that this was any different in other parts of the world. Central to Scott's reasoning is the notion of self-government. He points out how the state-centric view in which history is reconstructed is a gross distortion of reality, only possible because the temporarily large concentration of people in a formal state left a much larger footprint (in terms of documentation, architecture, but also garbage) than the more mobile and egalitarian communities (Scott, 2009, pp. 32–34). In fact, as he reasons, history is replete with clashes between self-governing peoples on the one hand and expansionary states on the other. The states of ancient Egypt, Greece, and Rome, as well as the early Khmer, Thai, and Burmese states, were surrounded by vast, ungoverned peripheries that represented both a threat and a challenge (Scott, 2009, p. 6). The same clash is visible in the creation of supersized polities, such as the Chinese Han, Roman, Ottoman, Hapsburg, and British empires. And it is clearly present in the subjugation of indigenous peoples in Africa, Asia, the Americas, and Australia.

For thousands of years the basic political units in Southeast Asia included the nuclear family, segmentary lineages, bilateral kindreds, hamlets, larger villages, towns with immediate hinterland, and town confederation. More complex levels of integration were very rare and short-lived (Scott, 2009, p. 36). Peoples could easily support themselves through the active exchange of goods, people, and ideas; a political administration or

"unified" territory was not necessary, as already pointed out by Fernand Braudel with regard to the Mediterranean (Scott, 2009, p. 48). Before the end of the eighteenth century the territory that roughly comprises Thailand today was sprinkled with hundreds of principalities, with each of its lords and kings paying homage to the king in Bangkok (Vandergeest and Peluso, 1995, p. 392). The farther from Bangkok, the more independent a territory was. Serfs and slaves were classified by category and by master rather than by residence (Vandergeest and Peluso, 1995, p. 393).

Was it any different elsewhere? We suspect not. In medieval Europe there were thousands of more or less sovereign units within the Holy Roman Empire, all officially acknowledging the authority of the Holy Roman Emperor but in practice quite independent. During the early Middle Ages and after the Romans departed, English localities and regions slowly coalesced into four kingdoms: East Anglia, Essex, Kent, and Wessex, which, under pressure of Viking invasions in the eighth and ninth centuries, united under the House of Wessex. Until the unification of France under one monarch, the French territory was nominally governed by one king, while regional dukes (those of Aquitania, Brittany, Burgundy, and Normandy) had the most power. This, then, was in the English, French, and German lands a feudal system of government that lasted from the sixth/seventh centuries well into the fifteenth century. While somewhat different, a comparable feudal system with many small centers of power could also be found in Japan between the twelfth and nineteenth centuries. Until the Norman invasion of 1169–1172, Ireland was ruled by five kings (those of Connacht, Leinster, Meath, Munster, and Ulster) under one high king.

Notwithstanding the general pattern and tendencies mentioned at the end of the previous section, there is quite a bit of variation in how these boundaries are set between countries and in how they are structured internally. How boundaries are set is particularly important in the international arena, and that will be addressed in the next section; how they are structured is more of a domestic issue, which is the topic of Section 4.

International Boundaries

Governing takes place in identifiable jurisdictions with natural (water, mountain range) and/or artificial (negotiated) boundaries. As we stated at the outset of this chapter, today almost all of the earth's landmasses are "administered space;" that is, belong to a specific country. The only landmass that does not is Antarctica, which is governed through the 1959

Antarctic Treaty, which by now has 42 signatories (Jorgensen-Dahl and Ostreng, 1991). How were and are these boundaries set?

Before the modern period, boundary setting was mainly a nonlinear process whereby borders were established through conquest, settlement, inheritance, sale/purchase, and secession (this paragraph based on Buchanan and Moore, 2003, pp. 317–335). In the case of conquest, an aggressor simply invaded an adjacent territory for its resources and thus enlarged his own state and revenue. Historically, conquest has been the most dominant mode of boundary setting. Settlement was a situation where one state occupied waste or vacant land and colonized it. Indeed, settlement was the main method through which a few European countries managed to acquire large territories in other continents either by settling their own populations (as in the Americas, Australia, and New Zealand) or by governing territories elsewhere in the desire to civilize them (as in the case of colonization of Africa and parts of Asia). With regard to land, sale/purchase and inheritance are much less common since a country's territory as a whole is not private property. Finally, secession may be the outcome of a particular group's effort to change existing boundaries, and this has become more common in our own time. Secession may take the form of complete separation from an original sovereignty, such as the desire of some Québecois pursuing independence from Canada, of some of the Basque people who wish to separate from Spain, and of Scottish separatists who wish to leave the Union with England that was established in 1707. A less disruptive form of secession is the acquisition of some degree of autonomy within a jurisdiction, as is the case with, for instance, many of the British Commonwealth countries (that are independent but recognize the British monarch as the head of state) and with Aruba within the Dutch Antilles.

There are two important moments in the development of the contemporary practice of international boundary setting. The first is the Peace of Westphalia of 1648 that laid the foundation of the modern state system; the second moment is really a period, 1900–1945, when the basic stages of modern boundary setting were defined.

The Peace of Westphalia ended the Eighty Years War between Spain and the Dutch Republic and the Thirty Years War in Europe. Relevant to understanding government today is that at the negotiations in the German city of Münster the *principle of nonintervention* was defined. Initially this concerned the ruler's right to determine the religion of her/his territory, but in the mid-eighteenth century this was extended to prescribe that rulers could not interfere in the domestic affairs of other countries (Krasner, 2001; Sørenson, 2004, pp. 103–121). Indeed, governments generally do not

intervene in each other's policies, and can do so only when a state's sovereignty is violated by another state (for instance, Iraq's invasion of Kuwait in 1991) or when a state commits serious crimes against humanity (for instance, genocide in Kosovo in 1995).

Since the late nineteenth/early twentieth century international boundary setting has been organized as a stage-wise, linear process. The first step is that of *delimitation.* This is the legal process through which sovereign states determine and describe where their common boundary is located. It usually is the outcome of a process at the negotiation table. The second step is *demarcation,* which involves marking the position of boundaries on the ground. The final step is *delineation,* which is a comprehensive description of all the demarcation and mapping activities that document the boundary for future reference (see Al Sayel and others, 2009; Al Sayel, 2010, pp. 7–8).

In the history of humankind it has only been during the past 50 years that the globe was mapped in its entirety. There is no unincorporated land left (save Antarctica). From the moment that sedentary communities emerged, which is now some 10,000 years ago, all world-systems, to use the concept of Christopher Chase-Dunn and Thomas Hall, underwent sequences of expansion and contraction, of centralization and decentralization. What started with a few pockets of sedentary habitation slowly but surely pulsated to finally encompass all land (Chase-Dunn and Hall, 1997, pp. 204–206). The long trend has been one of increasing polity size, and thus decreasing the number of autonomous polities. Rein Taagepera analyzed this trend with respect to the rise and fall of the world's empires (1978a, 1978b, 1979). The first phase from 2850 BCE to 700 BCE was prompted by beginning urbanization. The second phase until about 1600 CE was characterized by increasing capabilities to delegate power to territorially layered bureaucracies entrusted to help govern the territory on behalf of the ruler. The third phase came about as a consequence of the commercial-industrial revolution in Europe (1978a, pp. 121–123).

As the earth's lands were slowly but surely incorporated and the distinction between core (central city-state) and periphery (hinterland) disappeared, the territory within a polity was also more clearly delineated through hierarchically structured jurisdictions.

Taagepera's schema (see Figures 3.1 and 3.2) is appealing in its simplicity, but keep in mind that the historical record is far more complex, especially with regard to his second phase. Some empires were fairly successful in subjugating peripheral regions, such as the Chinese empire from the Han dynasty on. Other empires were much more loosely bound, and an example of that would be the Holy Roman Empire between the tenth and the early

FIGURE 3.1. SIZE OF EMPIRES 3000 BCE–2000 CE
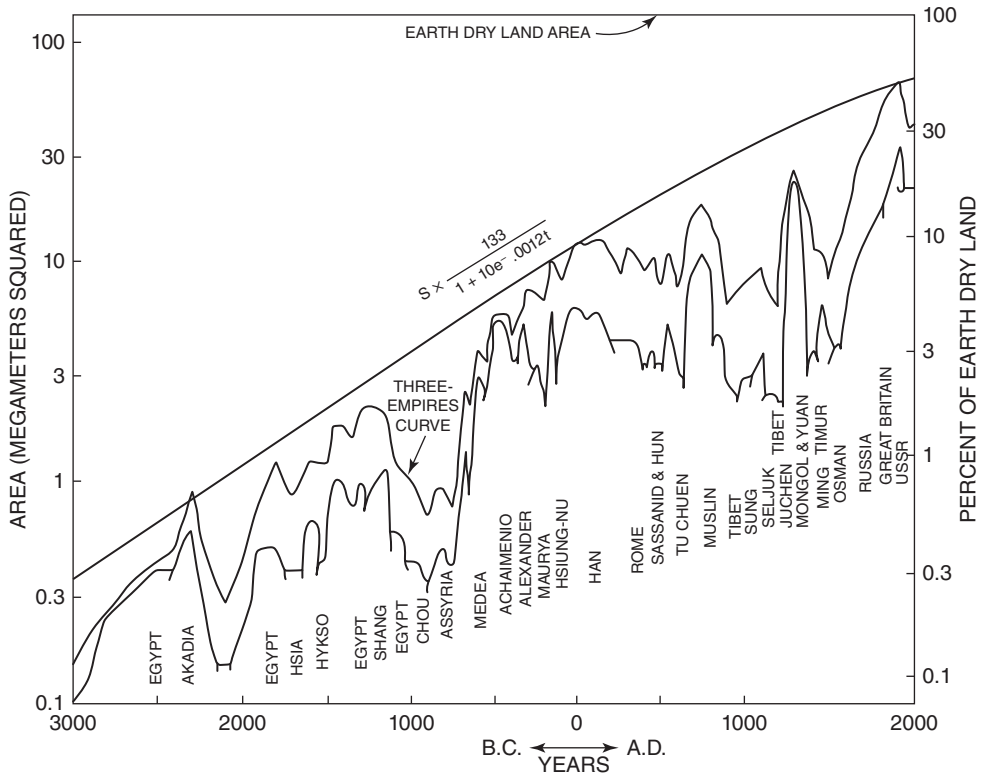
From Taagepera, 1978a, p. 115.

nineteenth centuries CE. Notwithstanding the differences, though, governments in both states and empires were slowly but surely increasing their hold on the territory through bureaucratization.

Subnational Jurisdictions: Historical Trends

The internal function of boundary setting serves to assure that the entire territory is effectively controlled from the center. Cities and city-states did not carve up their hinterland into jurisdictions, but as soon as the various urban centers interlocked and a larger territory was united under one ruler, the challenge was to find a way to maintain effective control. There have been two ways of doing so, and they appeared consecutively. At first a united

polity would be governed through a system of itinerant, palace-based supervisory officials. They were often related to the monarch. Thus, in ancient Egypt, these officials traveled throughout the kingdom, and this situation existed until the sixth dynasty (2350–2150 BCE). At that time Egyptian society had become more populous, and the local/regional elites came to replace the itinerant officials. Egypt was then divided into 42 *nomes* or provinces each with a *nomarch* or governor. Hence, Egypt was the first state where subnational jurisdictions were established at the regional level (Finer, 1997, p. 151). Other united territories continued to be governed from the center through relatives of the ruler. To be sure, sometimes later empires would still administer the land through traveling officials. In fact, Charlemagne's court traveled the territory continuously, and he controlled his territory through personal representatives known as *missi dominici.*

City-states and empires were often engaged in warfare, seeking to expand the territory they controlled and extracted resources from. Conquered territories were indirectly ruled through local kings. It was Tiglath-Pileser III (745–728 BCE), king of the Assyrian empire, who introduced direct rule in all conquered lands. Indeed, the Assyrians were the first to introduce regional or provincial government in the conquered territories, effectively treating them as part of the heartland of the empire (Finer, 1997, pp. 224–225). There were local officials as well: district governors for the supervision of several towns and villages, and headmen in each of the localities.

The next step in the territorialization of the globe happened during the reign of Emperor Diocletian (284–305 CE) (see, for instance, Abbott and Johnson, 1968). In 286 he subdivided the entire Roman Empire in four prefectures, 12 dioceses, and 101 provinces. These provinces, in turn, were divided into *civitates,* and the latter in several *pagi.* Thus, the Diocletian reforms for the first time in history established a layered territorial hierarchy from the smallest local level up to the upper-regional levels. This has been very important to the territorialization of the globe, since with the decline of the Roman Empire, the Catholic Church adopted the Roman territorial organization as its own. The *pagi* became parishes; the *civitates* became the seat of bishoprics, and the Roman provinces became church provinces (i.e., archbishopric). Indeed, the church not only copied the territorial structure but also took over a variety of services (Miller, 1983, pp. 278–279).

This is important for two reasons. First, a system of layered subnational jurisdictions can be found all over the contemporary world, and in many cases was actually introduced by colonizing powers. The second reason is that there are marked differences between countries when it comes to which level of subnational government is considered the most important:

the local or the regional level? In the territories occupied by Rome and of which the secular jurisdictions became the Catholic Church's religious jurisdictions, it seems that at least until the 1980s the regional level of government was more important than the local level. In territories where local tribal life was not obliterated by Roman occupation, a tradition of local self-government continued to exist. These territories often turned to Protestantism, and the organization of the various Protestant denominations mirrored much more the local, self-sufficient, self-governing organizational structure of early Christianity. Furthermore, many Protestant territories no longer accepted the supranational, centralizing supervision of the Catholic Church (Rokkan and Urwin, 1983, p. 33). This theory can be tested by looking at, for instance, municipal amalgamations (see Table 3.1).

They started shortly after the Second World War, in the Protestant countries, motivated by the desire to enhance and improve local public service delivery. It helped that these countries had a tradition of or were amenable to local self-government (Page, 1991, pp. 139–140). In Table 3.1 we can see how the number of municipalities declined strongly in Protestant-dominated countries such as Denmark, Sweden, the United Kingdom, the Netherlands, and Germany. The decline would have been larger in Germany had it not been for the reunification in 1991, which added municipalities. Municipal amalgamations were much less extensive in the Catholic countries. In France and Spain the number of local governments only declined a little; in Portugal and Italy the number of municipalities actually increased somewhat. The hypothesis that in territories not occupied by Rome (and thus with more of a tradition of local self-government, or at least of less disturbed tribal government) municipal amalgamations started earlier and were more extensive than those in Catholic countries can also be tested by looking at variation within one country. For instance, in Germany the *Länder* of Baden-Württemberg, Bavaria, and Rhineland-Palatinate are predominantly Catholic and amalgamations of local government have so far been more limited than in the Protestant north (Hesse, 1991, pp. 365–368). Another example is provided by the Catholic provinces of Limburg and Brabant in the south of the Netherlands. While local government amalgamations started shortly after the Second World War, they were mainly limited to the Protestant north and mostly occurred upon local initiative. In the two southern provinces amalgamations were imposed by Parliament and mainly not until the late 1980s. To have a Roman and Catholic past is not only relevant to Western Europe. European settlers in New England adopted a commonwealth tradition of local self-government based on a charter or constitution. The southern

TABLE 3.1. MUNICIPAL AMALGAMATIONS IN WESTERN EUROPE, 1950 – 2010 (COUNCIL OF EUROPE, 1994, P. 8 FOR 1950 AND 1992; LOCAL AND NATIONAL GOVERNMENT WEBSITES FOR 2010)

	1950	1992	2010	Evolution
Austria	3,999	2,301	2,359 (2007)	−1,640 (−41 percent)
Belgium	2,699	589 (1991)	589	−2,110 (−78 percent)
Denmark	1,387	275	98	−1,298 (−90 percent)
Finland	547	460	342	−205 (−37 percent)
France	38,814 (1945)	36,763 (1990)	36,682	−2.132 (−5.5 percent)
Germany	24,272	8,077	12,013	−12,259 (−51 percent)
Greece	5,959	5,922	1,033	−4,926 (−83 percent)
Iceland	229	197	76	−153 (−67 percent)
Italy	7,781	8,100	8,094	+313 (+4 percent)
Luxembourg	127	118	116	−11 (−8.7 percent)
Netherlands	1,015	647	443	−572 (−56 percent)
Norway	744	439	430	−314 (−42 percent)
Portugal	303	305	308	+5 (+1.7 percent)
Spain	9,214	8,082	8,112	−1,102 (−12 percent)
Sweden	2,281	286	290	−1,991 (−87 percent)
Switzerland	3,097	3,021	2,596	−501 (−16 percent)
United Kingdom	2,028	484	433	−1,595 (−79 percent)

United States was settled by Spain and France, both countries with much more centralized as well as elite government (Elazar, 1966, pp. 186–188). In fact, and more in general, colonizing countries organized subnational government after the fashion of their own country (see later).

Subnational Jurisdictions: The Contemporary Situation

Modern states increasingly turned to territorial strategies to control what people can do inside national boundaries. With regard to territoriality, many authors focus on the external element of territory (for instance, sovereignty, international borders, and political identity) and have less attention for the spatial organization of state administration within a territory. One exception to this tendency is Michael Mann, who writes that societies "are constituted of multiple overlapping and intersecting sociospatial networks of power." (1986a, p. 1) One of those networks is political power (next to ideological, economic, and military), which in the modern state is structured and visible in centralized, territorial regulation (1986a, p. 10–11).

All modern states have divided their territories into complex and layered or nested political jurisdictions for, among others, taxing and zoning purposes. As became clear in the previous section, this is not a feature of modern states only. Most contemporary states have anywhere between two and five tiers of government. The national government represents one tier in a system of multilevel government that ranges from the supranational level (the United Nations, the European Union, the military and the economic alliances, etc.) to the most local level.

Table 3.2 requires some explanation. First, it is clear that some countries still have a distinction between urban and rural local governments. Often the number of tiers in rural areas exceeds that in urban areas. This is in part because the former have smaller populations and fewer financial resources so that rural communities seek intermunicipal arrangements to provide for services (see also later). The distinction between urban and rural communities dates back to the Middle Ages when the rural communities developed out of the parishes of the Catholic Church and when some cities acquired charters that provided them with some degree of autonomy from an overlord. Since the Napoleonic reforms of the early nineteenth century, the distinction between urban and rural local governments has become less and less common and has been replaced with uniform pattern of local government as can be found in, for instance, the Netherlands or Luxembourg. Finland, though, still has urban and rural municipalities (see Figure 3.2).

TABLE 3.2. EXAMPLES OF TWO-TIERED NESTED SUBNATIONAL GOVERNMENTS

Country	Municipal Level
Cyprus	524 local governments: 33 municipalities, 491 rural communities
Estonia	227 municipalities
Finland	342 municipalities (108 cities, 234 rural municipalities)
Luxembourg	118 municipalities
Slovenia	210 municipalities of which 11 are urban municipalities

From Halásková and Halásková, 2009, p. 65.
Nota bene: Data for Cyprus include the northern part as well.

Second, there is sometimes a regional level of government that some scholars regard as a third tier (see, for instance, Hooghe and Marks, 2009, p. 229 with regard to Luxembourg) but cannot really be counted as a third tier. Thus, in Finland there are 90 jurisdictional districts and another 20 regional councils, but both these operate as regional "arms" of the national state and are thus an example of deconcentration. The same is the case in Luxembourg where each of the 116 municipalities belongs to one of 12 cantons, and to one of three districts.

In Table 3.3 the Netherlands is a country with uniform local and provincial governments. The regional level is not an administrative extension of national government. It has its own responsibilities and policies. Austria is a country with four types of local government but is uniform in territorial structure at the regional level.

In Table 3.4 France has a system of uniform government at all levels, but the United Kingdom has four different types of local authorities. France is also one of those countries with a large number of small to very small municipalities. From that we can infer that service delivery and public policy at the departmental and regional levels are far more important than at the local level. Rural municipalities may be large in territorial size but small in population, while urban municipalities may be small or large in terms of territory but certainly large in terms of population. Rural municipalities do not have the tax base to provide a range of services, but do have a sense of tangible community. Urban municipalities can offer a wide range of services, but the sense of community may be much less. In Figure 3.2

FIGURE 3.2. SIMPLIFIED DIAGRAMS OF LOCAL GOVERNMENT UNITS

Simplified Geographical Diagram of some Intermediate Units

a. The Netherlands

M	M	M	M	M
M	M	M	M	M
M	M	M	M	M
M	M	M	M	M
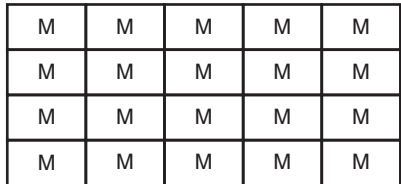
An example of a uniform municipal system

b. United Kingdom
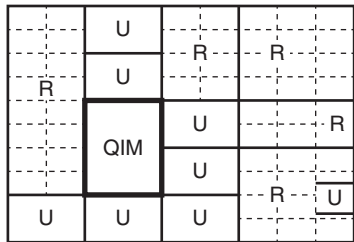
An example of a diversified system with quasi-intermediate units (county borough) and sub-municipal units (parishes)

c. United States — Some Western States
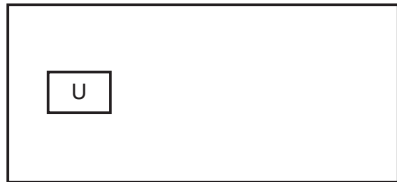
An example of a secondary unit that is not subdivided in rural areas

I Symbols:			Boundaries:
U	=	urban municipality	——————— secondary unit
R	=	rural municipality	——————— basic unit
M	=	uniform municipality	- - - - - - - - sub-municipal unit
QIM	=	quasi-intermediate municipality	

From Humes and Martin, 1969, pp. 68–69.

FIGURE 3.2. (*CONTINUED*)

d. **Finland**

U	U	R	R	R
U	R	R	R	U
R	R	R	R	R
R	R	R	R	R

An example of a diversified municipal system

e. **Germany**

An example of a uniform municipal system with quasi-intermediate units

TABLE 3.3. EXAMPLES OF THREE-TIERED NESTED SUBNATIONAL GOVERNMENTS

Country	Municipal Level	Regional Level
Austria	2,357 municipalities (15 statutory cities, 197 towns, 755 markets, 1,390 villages)	9 federated states
Denmark	98 municipalities	5 regions
Ireland	114 local councils (29 counties, 5 cities, 75 towns, 5 boroughs)	8 regional authorities
Netherlands	443 municipalities	12 provinces
Sweden	290 municipalities	20 (18 counties, 2 regions)

From Halásková and Halásková, 2009, pp. 65–66.

TABLE 3.4. EXAMPLES OF FOUR-TIERED NESTED SUBNATIONAL GOVERNMENTS

Country	Municipal Level	Second Level	State or Regional Level
France	36,683 municipalities	100 departments	26 regions
Germany	12,196 municipalities, 116 districts and free cities	323 rural districts	16 federated states
Italy	8,101 municipalities	103 provinces	20 regions
Spain	8,111 municipalities	50 provinces	17 autonomous communities
United Kingdom	434 local governments (127 unitary authorities, 36 metropolitan authorities, 238 district councils, 33 London boroughs)	34 county councils and the Greater London Authority	3 devolved nations (Scotland, Wales, Northern Ireland)

From Halásková and Halásková, 2009, p. 66.
Nota bene: The count for France includes the overseas departments and regions.

some examples are provided of local government structures in a few, mainly, European countries.

This system of multitiered government can be found all over the world. In Latin American countries the number of municipalities has grown in the past 20 years as a function of urbanization and of rural fragmentation (Nickson, 2011, p. 17). In many countries there are still urban and rural municipalities (Nickson, 2011, p. 8). Having been colonized by the Portuguese and the Spaniards, local government was embedded in a highly centralized system until recently; in the past 20 years many countries have adopted decentralization policies (Nickson, 2011, p. 4). The territorial structure of the Francophone countries in Africa is usually quite centralized, and with more emphasis on deconcentration (which involves transfer of tasks only) than on decentralization (which involves transfer of tasks and of decision-making authority). In Anglophone countries there is more variation in decentralization with strong federalist systems as well as with highly centralized unitary states (United States Agency for International Development, USAID, 2010, p. 49). Just as elsewhere we find federal and unitary systems of government in Asia and the Pacific. Most countries have

TABLE 3.5. EXAMPLES OF MULTITIERED SUBNATIONAL GOVERNMENTS IN ASIA (UNESCAP)

Country	Local	Regional
Australia	769 local governments	6 states, 2 territories
Bangladesh	64 districts, 490 urban municipalities, 4,451 rural municipalities, 80,000 villages	6 administrative divisions
Japan	3,232 municipalities (669 cities, 1,993 towns, 570 villages)	47 prefectures
Malaysia	26 municipalities, 113 districts	14 states
S. Korea	232 cities, 89 rural counties, 69 districts	7 metropolitan cities, 9 provinces

three-tiered systems. Some countries have several types of regional and local government. Thus, at the regional level China has 22 provinces, five autonomous regions, two special administration regions, and four municipalities that fall directly under the authority of national government. At the local level there are county-level cities, cities, townships, autonomous prefectures, and autonomous counties. Many Asian and Pacific countries distinguish rural (towns) from urban (cities) municipalities (United Nations Economic and Social Committee for Asia and the Pacific, UNESCAP, no year; see Table 3.5).

Previously we described processes of amalgamation in Europe, but amalgamations have occurred elsewhere as well. For instance, in Australia a variety of local communities were consolidated in the past 20 years without much community consultation. As a consequence, some are now considering the possibility of de-amalgamation (Dollery and others, 2011). Amalgamations are often accompanied by decentralization, and are generally successful when local government jurisdictions are reflective of some degree of community: social, cultural, ethnic, and so forth. They have been far less successful in Africa where formal local jurisdictions were superimposed above, and still coexist with, traditional tribal authorities. The official jurisdictions are often too large, do not correspond with local communities of varying size, and suffer from lacking ties between the elected political leadership and the population (Wunsch, 2008, pp. 33–34).

A complex subnational government structure can be found in the United States. At the state, i.e., regional level, government is uniformly structured (50 states); at the local level, however, there is intriguing variation. The total number of subnational units has significantly decreased in the past 70 years: from 155,116 units in 1942 to 87,576 in 2002 (United States Census Bureau, 2002). These numbers include all subnational jurisdictions. The number of states has increased with the addition of Alaska and Hawaii after the Second World War. The number of county governments has been quite stable from 3,043 in 1952 to 3,034 in 2002. Then at the local level there are two types of government. *General-purpose governments* (cities, townships) offer a wide range of services. There were 34,009 general-purpose governments in 1952; 60 years later this had increased to 35,933. The increase is solely in municipal governments, an indication of continued suburbanization (Hardy, no year). The number of towns or township governments actually declined in the same period from 17,202 to 16,504. The main drop in jurisdictions at the local level has been caused by an overall decline in *special-purpose local governments.*

There are two types of special-purpose local governments in the United States. The largest single group is that of the school districts, and of the 67,335 in 1952 there are only 13,506 left in 2002. A comparable amalgamation of school districts has taken place in Canada. In the United States all other special-purpose governments actually increased in numbers from 12,340 in 1952 to 35,052 in 2002. Initially, special districts were established some two centuries ago for the provision of special services at the regional level and included boards of poverty relief, of police, of ports, of sewer/ water, of health, and of sanitation (this paragraph based on Martin and Bradshaw, no year, pp. 2–4). A second wave was prompted by fragmentation of the population, macroeconomic boom-bust cycles, and home rule movements between 1870 and 1920. People demanded urban services outside the traditional municipal boundary, desiring region-wide services connecting the city with the growing suburbs. A third wave happened during the 1930s and 1940s in the effort to curb power from big city administrators. Rapid suburbanization after the Second World War provided further incentives for special districts.

More than 90 percent of special districts are single-purpose governments that perform a function independent from general-purpose government; that have the power to make financial decisions and levy taxes; and are administered by a popularly elected board. How great the variation in special-district governments can be gauged from a simple listing (see U.S. Census Bureau: http://en.wikipedia.org/wiki/Special-purpose_district).

These special-purpose governments determine their own boundaries, and thus the various jurisdictions at the local level come across as a patchwork, testimony to the extent to which the United States' local governments are polycentric. Special-purpose governments are not unique to the United States. Switzerland is another country with a large number of special-purpose governments. In countries where the population of general-purpose jurisdictions is small, local governments seek to provide services on the basis of an intermunicipal agreement. There are also intramunicipal special-purpose authorities, and these can be found mainly in Australia, Canada, India, New Zealand, and the United States. The best examples of these are school districts, established to protect education from politically inspired influence (Humes and Martin, 1969, pp. 73–76).

Of all territorially defined jurisdictions, the local government level is the one that people can most easily identify with. It is, in the words of Mill, the "school of democracy." (1984, p. 378) But not only that, it is also the level where the largest range of public services is provided; it is at that level that citizens can actually see what governments can do for them. People often think of "big government" as concerning the national level, but they do not consider the local level. In the European Union with 27 member states there are 91,252 municipal governments and only 935 intermediary and 319 federated subnational governments (Hermenier, 2009, p. 4). In the United States as well, the local level represents by far the largest number of jurisdictions. How much variation there is across the globe would require research, and in some countries the local level may be large in terms of number of municipalities (for instance, France) but low in terms of personnel size (more on that in Chapter 8). With the exception of Africa, one of the main trends in the past 20 to 40 years has been that of strengthening local governments, first through amalgamations and next by means of decentralization (for Europe, see Wollmann, 2009, pp. 89–90).

Bureaucracy as Organizational Structure: The Bureaucratization of the World

The potential of governing a large territory can only be realized fully with the help of sophisticated coordinating mechanisms (Merelman, 1988, pp. 587, 595, and 598). Territorialization does not visibly improve the territory and the communities living in it. Territory and people need to be monitored, and that takes people (military, police, etc.) who are not productive

otherwise and who need to be supported through taxes. It is in this sense that bureaucracy and bureaucrats can be a burden to society. Some anthropologists argued that complex social organization, which includes bureaucracy, coordinates people and resources and thus solves rather than creates problems. Complex organizations help establish social stability (for instance, Cohen, 1985). Others argued the opposite case (for instance, Paynter, 1989). A case can, indeed, be made that bureaucratic organization was rather parasitic for most of history, serving those in power rather than the people. But can we still say that bureaucracy is a problem rather than a solution? Can the modern state do without bureaucracy? Can political officeholders work without the specialist's and generalist's input of the career civil servant? We argue that bureaucracies contribute to the collapse of society when their cost to society is larger than their benefit. Hence, when bureaucracies exist only to extract resources in kind, labor, and/or money from the population at large, then they are parasitic. However, when bureaucracies actually provide services to populations, and when the benefits of their existence outweigh the costs, bureaucracies will continue to exist. We believe that in the modern world the latter situation has become common, at least in democratically governed systems: Bureaucracies are in general no longer a burden (Masters, 1986, p. 157).

The work of state functionaries has to be coordinated. Throughout history this has been done through organization, and bureaucracy is the best-known type of organization in the contemporary world. It has been argued that rudiments of bureaucratization existed at least 12,000 to 19,000 years ago, given that at least one archaeological site provides some indication of such organizational features as division of labor, hierarchy, and rules regulating operations and behavior (Nystrom and Nystrom, 1998). However, that seems to be stretching the concept of bureaucracy. These three aspects of organization are not unique to bureaucracy. Common pool resource management systems, as analyzed by E. Ostrom and many associates across the globe, are not described as if they are bureaucracies, and yet they do exhibit specialization and have hierarchy and rules-in-use.

Bureaucratization is a process that many defined as one where organizations strengthen and expand the features Weber listed as characteristic for bureaucracy. His definition contains at least two elements: bureaucracy as type of organization (Chapter 6) and bureaucracy as personnel system (Chapter 8). In this chapter we will limit ourselves to bureaucracy as it unfolded over time.

As a type of organization characterized by high degrees of standardization then, clearly, bureaucracies existed in antiquity. Irrigation, food

storage (granaries), recording economic transactions, and taxation are all activities that required a bureaucracy with specialized agencies employing people trained in keeping records. There is evidence of organizing public activities in separate departments in most ancient civilizations that had become states (for instance, Chadwick, 1959). Departmentalization went hand-in-hand with some degree of professionalization; that is, those who kept records had to be literate. This may seem obvious, but in societies where the large majority of people could not read or write, it is a great accomplishment to master the skill of literacy. Civilizations and states may have waxed and waned but, once established, bureaucracy would not wax and wane. Naturally, specific agencies and government bureaus disappeared with the demise of a polity, but as an organizational device, bureaucracy has been around for millennia. Downs is correct to observe that very few bureaus managed to survive long periods of time (1967, p. 23), but he refers to specific examples of bureaus, not to the phenomenon of bureaus.

This is not the place to provide a detailed description of the emergence and development of government departments (see Raadschelders, 1998b, pp. 114–125), but departmentalization occurred everywhere once societies became more complex. Departmentalization concerns the bureaucratization of the organization and thus of the functions and activities of government. Structuring territory and organization has often preceded the professionalization of personnel. That is, for most of history those who could be designated as public sector personnel generally worked for a ruler, not for the people. Rulers appointed public sector personnel on the basis of ascription and/or relationship first; merit (literacy, relevant experience) came second. Once public-sector personnel becomes a civil service, i.e., a body of functionaries serving the people on the basis of individual expertise and experience, modern bureaucracy arises. This happened everywhere, in England (Aylmer, 1980) as well as in the Ashanti Empire (Wilks, 1966), just to mention two examples, and did so from the second half of the eighteenth century.

So far we discussed the emergence and development of bureaucracy as organization, but at least one author argued that society itself has bureaucratized as well (the following based on Jacoby, 1976). To Jacoby bureaucratization represents the situation where people's lives and behaviors are increasingly controlled by government agencies: "not only is he unable to escape from the regulation and manipulation, he seems to depend on it." (p. 1). People both complain about but also demand bureaucracy: "Modern man has lost spontaneous self-help. Projects which help others have become rarer; people now depend on specialized agencies to which they can turn."

(Jacoby, 1976, p. 1) This observation is immediately followed by a crucial comment:

> Centralization of all functions and accumulation of power are on the inside (JR/EVG: government); isolation and impotence of the individual are on the outside (JR/EVG: society). These opposites have consistently intensified each other. *Thus the looser western interpersonal relations became, the more they depended on bureaucracy* (1–2; emphasis added).

This comment concerns one of the most major societal changes in the history of humanity, i.e., how the "triple whammy" (see Chapter 2) of industrialization, urbanization, and population growth "moved" humanity from a society based on (inter)personal relations to a society of imagined communities. In the industrial society, it is no longer the small, physical community of old that protects us from the hazards of life, but it is government. And how does government protect its people? It does so by offering services hitherto provided between individuals in physical communities of people. The virtue of caring for one another when in need is normal and expected in physical communities. Once isolated from one another, as is the case in the urbanized world, it is government that cares for those who cannot care for themselves. In a way, the welfare state is nothing but an institutional arrangement substituting for the type of community care that existed locally throughout history. Henry Jacoby was not the first to see where society was headed. Already in the 1830s De Tocqueville observed that "Democracy loosens social ties, but tightens natural ones: it brings kindred more closely together, whilst it throws citizens more apart . . ." (2000, p. 233) Large-scale democracy emerges across the globe wherever societies become urban, and it is urbanization and industrialization that loosen social ties, that take people out of the natural community and back into the nuclear family. To what extent is this the case today? Have people truly become dependent upon government? Have social ties loosened, and if so, to what extent? An answer cannot be given, since it is impossible to measure "loosening of social ties" in a way that will satisfy everyone. But, considering that there are thousands upon thousands of common-pool resource management systems across the globe, there is reason to believe that bureaucratization and democratization have not overtaken social coordination mechanisms entirely.

Max Weber's *Die Bürokratisierung gehört die Zukunft* (1980, p. 834), echoed in Joseph Schumpeter's "Its expansion is the one certain thing about our

future" (1950, p. 294), is both true and untrue. What is true is that bureaucracies have grown in size, all over the world, by any measure we have: personnel size, revenue and expenditure, organizational differentiation, and regulatory activity. At the same time, bureaucracy has not gobbled up democracy as Weber feared, and this can be demonstrated in at least three ways. First, the civil service generally supports those who are elected in political office. Second, next to the common-pool resource systems, there are plenty of other examples of self-governance (e.g., homeowners organizations, sports clubs, churches, and so on). Third, and finally, an administrative state where the civil service dominates all politics has not become reality.

The Influence of Colonization

In the year 1900 about 35 percent of land surface of the earth was colonized (Pounds, 1990, p. 349). Colonization has been of enormous influence upon the structuring of governments throughout the globe. Looking at the state-system from an international relations point of view, Chase-Dunn and others argued that the colonial empires of a few European states "brought the whole earth into a single relatively homogenous global polity for the first time." (2009, p. 275) The European interstate system established at the Conference of Westphalia in 1648 is still in place, and today it encompasses the globe. A second aspect of globalization from the international relations point of view is that we now have a layer of international organizations in the various world regions (Chase-Dunn and others, 2009, p. 276). Some of them are truly global such as the United Nations, the International Monetary Fund, and the World Bank. Others span world regions. However, it is not just the international state system that has become global. Global is also how governments are structured. Territorialization, as evidenced by the establishment of nested jurisdictions, and bureaucratization as visible in the creation of specialized agencies or departments, can be found from small island states to the largest polities in the world.

That nested territorialization and hierarchies have become the dominant mode of structuring government may be a fact of social life in many species, but in its dissemination across the globe it is also a function of colonization. There are two types of colonization (Tully, 2000). The type we are most familiar with is known as *external colonization,* which is when an imperial power takes and governs territories outside its own sovereignty. This has happened mainly in Latin America, Africa, and Asia. Less familiar is *internal colonization,* where the initial inhabitants of a territory are

confronted with efforts at domination by a national or neighboring power, and is what happened in North America, Australia, and New Zealand. With regard to external colonization, a few Western European countries engaged in this from the early fifteenth century on.

The first imperial age (1419–1760) started with a Mediterranean phase dominated by Spain and Portugal. They established trade factories under state rule and subdivided the territory in administrative districts. Spain established four vice-royalties in Latin America. New Spain (present-day Mexico) and Peru were created in the sixteenth century; New Granada (present-day Colombia, Ecuador, and Venezuela) followed in 1739 and Rio de la Plata (encompassing Argentina, Bolivia, Paraguay, and Uruguay) in 1776. The Atlantic phase (1550–1760) was dominated by the Dutch Republic, England, and France. The Dutch and English used autonomous companies to rule in name of the mother country (for instance, East and West India Companies). Generally, Belgian, French, Japanese, Portuguese, and Spanish colonizers favored some degree of *direct, more centralized rule,* while American, Dutch, and English colonizers were partial to *indirect, more decentralized rule* (Geering and others, 2011, p. 401). In the latter case, existing local institutional arrangements and their officeholders were employed by the mother country to help govern the territory. Thus, the British used the existing Muslim governing institutions in northern Nigeria. Direct rule was more common where institutional systems of rule did not exceed the band level, such as in North America and Australia. The British also used direct rule in Burma, since they had abolished the indigenous political systems.

The first wave of decolonization occurred in 1770–1820 with the independence of the United States of America and of many Central and South American countries. The latter was made possible because the Napoleonic wars and occupations meant that mother countries could no longer effectively control the colonies. The second imperial age involved the occupation of large parts of Africa by England, France, Germany, Italy, and Belgium. Especially tragic has been the presence of colonial empires in Africa, where local, tribal boundaries were simply cut by new territorial boundaries (see Davidson, 1992). The second wave of decolonization occurred after the Second World War. The Middle East and Asia were first with Jordan, Lebanon, and Syria in 1946 and Israel in 1948; Burma (nowadays Myanmar) in 1948; India in 1947; Indonesia in 1949; Pakistan (and Bangladesh) in 1947; the Philippines in 1946; and Vietnam, Laos, and Cambodia in 1954. Africa followed with the Sudan and Morocco in 1956, Ghana in 1957, and a series of decolonizations in Africa between 1960 and 1965. The last of the larger territories to become independent in that continent were Angola (1975),

Mozambique (1975), and Namibia (1990). More recently some smaller territories have become independent, such as East Timor in 1999.

A major consequence of colonization has been that various Western traditions regarding the structure and functioning of government were imposed on the colonies. We already mentioned the creation of artificial boundaries negotiated between the colonizers. After independence, all former colonies simply maintained the territorial structures established by the colonizers. However, colonization was not necessary for the adoption of Western styles of governing. Thailand, the only country in Southeast Asia that escaped being colonized, followed trends in colonized states in the region by adopting internal administrative reforms such as a Western style land code and claiming ownership of all "unoccupied" land at the end of the nineteenth century. Local administration was territorialized and centralized throughout the country, and layers of nobles and local lords were transformed into salaried officials, as had happened in Europe during and after the Napoleonic reforms. Provinces were divided into districts, and a member of the local nobility was simply transformed into a district officer. Below that level, direct masters of serfs were replaced with village heads and subdistrict chiefs. The office of village head was similar to that of the British system in India and the Dutch system in Netherlands East Indies. The highly centralized provincial and district administration had more resemblance to the French colonies in Indochina (Vandergeest and Peluso, 1995, pp. 396, 398, 399, and 401).

Western influence in former colonies has not diminished. Indeed, bilateral and multilateral donors of development have since the 1980s demanded Western-style reforms including anticorruption measures through civil service reform and accountability reforms (concerning the budgetary process, information technology and record management, and audit systems), decentralization (see earlier), privatization and marketization, strengthening service delivery through private and nongovernmental organizations, and the establishment of civic associations. Thus, Western political beliefs in freedom, self-determination, democracy, and market are advanced in non-Western countries. Some say that these reforms are pursued to a point where they actually reinforce Western beliefs rather than support indigenous traditions of governing (Farazmand, 1999).

Concluding Remarks: Boundaries Creating Polities

To understand the challenges that contemporary governments face everywhere in the world, it is necessary to understand that they all more or less

operate upon the same structural properties. It is, indeed, striking to see how territorialization through jurisdictions and horizontal and vertical differentiation of organization through bureaucracy have become pretty much universal (Hooghe and Marks, 2009, p. 238). With regard to territorialization, consider it as a process whereby slowly but surely the reach of sedentary pockets at the local level expanded to incorporate ever more land. Initially, the dominant polity level is that of the city-state, and the Mesopotamian city-state system is the earliest example of this. At some point polities expanded to be defined at a regional and then a state level that can only be administered when the territory is subdivided into smaller jurisdictions, which is what happened first in ancient Egypt. The next step was that of conquering polities that organized their newly acquired lands in a manner comparable to that of their own. The Assyrian and the Roman Empires are the earliest examples of that. The same was later done through colonization of parts of Africa, Asia, and Latin America.

For much of history polity size oscillated between city-state and empire, but from the seventeenth century on, the state became the most dominant type of polity. It was decolonization through which the political-administrative traditions of a few European states disseminated throughout the globe (Chase-Dunn and others, 2009, pp. 273–275). This spread of territorial and bureaucratic organization meant that, at some point, states "bumped" into one another. In terms of external relations they had to establish rationales for their boundaries. Internally, states had to find a balance with subnational governments and develop a sense of nationhood and citizenship. This process of state making, of nation building, and of civic awareness will be the topic of the next chapter.

STATE MAKING, NATION BUILDING, AND CITIZENSHIP

National or *territorial states* have become an almost universal phenomenon. As we saw in the previous chapter, the entire globe is carved up in territorial states that are generally smaller than empires and larger than city-states (of which there are not many left). But while states may have structured their territories in comparable ways (see previous chapters), they are very different in how they function, and this becomes especially apparent in Chapters 9 to 12 of this book. Meanwhile, it is actually possible to "see" differences between states even when only visible as "lines in the sand." In their recent study on the influence of the interplay between political and economic institutions upon nations (we would say: nations and states), Daron Acemoglu and James Robinson described the contrast between Nogales, Arizona, and Nogales, Sonora. The description (2012, p. 7) and the first two photographs in the middle of the book provide a startling contrast. What is one community of people, Nogales, with many sharing ties of kinship, is divided by the Mexican–American border. On the south side of the border poverty is visible in housing and infrastructure; on the north side people are clearly better off. Why? The authors theorize that in the United States people live and work in a society built upon *inclusive political and economic institutions*; that is, people can participate in the public realm and can pursue their own entrepreneurial interests. In less inclusive (that is, exclusive) societies, political and economic institutions

are merely used by the elites to extract resources from the population in support of what they deem to be a lifestyle appropriate to their status (we will discuss later that this analysis is too simple and does not capture the extent to which certain categories of people are excluded from political and economic participation in inclusive communities). Indeed, territory as circumscribed by borders and jurisdictions makes a difference. It even can make a difference within a country, especially when certain (poorer) areas at the local level can be excised from a municipality, as is possible in the United States (Burns, 1994). As far as we know, in other Western countries local governments cannot remove the poorer areas from their jurisdiction.

The concept of *state* is often defined in terms of population or people, territory or land, with a clear monopoly over the use of violence. This includes both the maintenance of public order and safety (internal) and the defense of the territory against foreign aggressors (external). These internal and external elements hark back to understanding the state as a political system whose sovereignty is somewhat protected by international law since the 1648 Peace of Westphalia: Today one can generally neither invade the territory of nor meddle in the internal affairs of a recognized sovereign state. This view or definition of the state is rather top-down by nature, placing government at its center. It is rather different from the Hobbesian philosophy of the seventeenth century highlighting a *social contract,* which builds a bidirectional relationship between rulers and citizens. This approach allocates enough power in the hands of the people to prevent misuse of government authority. This view to perceiving the state implies that it is the only societal actor left that binds people together, and then specifically in their role as citizens. It is in this role that people are truly equal before and in the eyes of the law. In this view the state and its government are more situated amidst the citizenry it serves.

Traditionally, state making and nation building are topics studied in political science, but there is every reason to believe that understanding the origins, the development, and the current role and position of the state are important to understanding contemporary government (see, for instance, Vigoda-Gadot, 2009). In other words, the study of public administration needs to prepare its (future) career civil servants, military personnel, and political officeholders as well as citizens at large for the political and societal context within which government officials operate. In this chapter we will start with defining state and nation, with special attention paid to different

conceptions of state and how these may influence our perception of government. We then proceed to outline the processes of political and administrative centralization, because these have occurred everywhere even if to varying degrees of centralization (Section 2). In this section we will also discuss such concepts as weak, strong, and failed states that are quite popular but not so useful for describing reality today. One important aspect of state making is that it is a process where state and government slowly, sometimes faster, but always surely differentiate themselves from other societal organizations. Of all society's overarching institutions, it is state and organized religion (church, synagogue, mosque, temple, and so forth) that have been very much intertwined for most of history. High-ranked state officials often held high positions in organized religion (for instance, Egypt's pharaohs, the English monarch since Henry VIII). There-fore, separate attention will be given to the relation between organized religion and state, the rationale for its separation over time (Section 3), and why this separation has been important for the emergence of the nation-state.

State making is related to nation building (Section 4), which is the process of forging together a population on the basis of shared history, culture, language, and so forth, even when most people cannot and never will know one another on a personal basis (see Chapter 2). In some cases nation building preceded state making (as in the cases of, for instance, Germany, Israel, and the United States), while in others it followed (as in the cases of, for instance, England, France, and the Netherlands). There is no real pattern other than that state and nation become more closely intertwined at some point in any country's history. Even in the case that a state was artificially created and the boundaries of which crossed and separated tribal areas, as has been the case in large parts of Africa and Latin America, there may be a sense of being a Nigerian or a Brazilian next to identifying with a specific tribe. Whether preceded or followed by state making, nation building in the past 150 years or so occurs in the context of defining citizenship. Being a citizen, as noted previously, is the only role that all people have in common in modern society. Losing one's citizenship means detachment from a state and in many cases also from territory and people. The fact that we identify as citizens and, perhaps more important, that the expression of citizenship varies with level of government requires a comparative discussion of the nature of today's multilayered citizenship (Section 5), and that provides a nice stepping-stone into the discussion of multilevel government in Chapter 5.

Defining State and Nation

People always try to define the circumstances they are in and dominate their existence. They seldom consider the origins of the terms *state* and *nation*, nor the reality that such terms circumscribe in the present. As individuals, people will always respond to present challenges in a manner that befits their own era, customs, examples, and elders. In the present time, actually since the late eighteenth century, people have been allowed—in some places sooner than others—to respond to life's circumstances as citizens. It is in that role, as citizens, that people can understand the contingencies confronting them when considering the context within which they live, because that context transcends the experiences of the nuclear family, the extended family, or even the band, tribe, or nation they grew up in. Part of that larger, somewhat, or much more alien, context is that of the state. Another part of that, somewhat less alien, context is that of band, tribe, or nation. In this section we shall first explore the concept of state and then proceed to discuss what is perceived as nation.

In the world today people are members, willingly or not, of a state. There are no people on this earth who are not part, as citizens, of a state (unless citizenship has been stripped because of crime). Today, every child born is born in a state, and her or his name is registered within days or weeks of birth. And that child will be, once registered, a citizen of that state until death. Exceptions only include the change of citizenship from one state to another, or dual citizenship. And even that is not really an exception. We may be born "free" but are soon citizens, yet we surely will die being a citizen somewhere. In today's world, as much as people may in a sociological sense identify with a specific region or tribe (or whatever), they are part of a state. And this is no clearer than when people need to get a passport in order to travel abroad to other states. In a legal sense all people are citizens of a state. Hence, quite obviously, the terms citizens, citizenship, states, and nations are strongly bound together and curry profound meanings and implications, especially from a global and comparative viewpoint.

The current understanding of the concept of state dates back to the late Middle Ages, when it was regarded as a geographically circumscribed area ruled by divine right and/or military might by a strong individual or family. In the course of the seventeenth century, the state concept was no longer tied to a specific individual. It merely was a territory in whose internal affairs other such clearly demarcated territories could not and should not interfere. This conception of state found its first international

(Western European) agreement in the Peace of Westphalia mentioned previously and was solidified in Weber's formal definition of state as an entity characterized by:

a. control over a well-defined, usually continuous territory;
b. a relatively centralized administration;
c. differentiation from other societal associations through the development of permanent and society-overarching institutions; and
d. a monopoly over the use of coercion, assuring that it could pass justice in the name of all (Tilly, 1975, p. 27; Dyson, 1980).

This is a twentieth century understanding of *state,* that is, a political entity defined in terms that are (1) territorial, (2) top-down and centralized, (3) autonomous, and (4) sovereign, and was as such confirmed at the Montevideo Conference of Rights and Duties of States (1933), the participant countries of which were all located in the Western hemisphere, but its notion of an internationally recognized sovereignty was adopted across the globe. It is important to recognize that this is a truly twentieth century definition of state, for it assumes that military power is subject to political power, and that is a situation most unusual in history (Mann, 1986a, p. 11; Mosca, 1972).

Now, in the second decade of the twenty-first century, this definition of state dominates juridical understanding and so international law. After all, a state is not expected to invade another without expecting others, such as allies, to come to the latter's need. A state's internal affairs should not be tampered with unless under circumstances of severe duress (however defined: genocide, economic crisis, medical crisis such as Auto Immune Deficiency Syndrome (AIDS), and so forth). We emphasize this juridical or legal definition of state because it dominated twentieth century thought about state. The authors of this volume grew up unaware of any other than this legal definition of state. However, growing up, the authors of this volume also encountered doubts about this Weberian definition of state. These doubts were not inspired by pristine or rather philosophical thoughts about state (as in contrasting to nation, or contrasting to the earlier medieval notion of "status in life"); instead they were inspired by a more sociological sense of state. In a legal sense it is quite clear what constitutes a state. In a sociological and psychological sense the meaning of state varies with country and with perspective, attitude, and behavior.

Where legal perspectives tend to present cases in terms of black or white, that is, a territory is a state or not, a sociological or psychological

perspective (troubling to some) presents reality in terms of shades of grey. Just considering and scanning literature on state in the twentieth century we find that a legal or juridical definition of it dominates until the 1960s. It is then that many new states enter the world stage and that is when, as John Nettl noted, the link between state and nation—so taken for granted—was snapped (1968, p. 560). In the wake of decolonization, and then with the dissolution of the Soviet Union, it became clear that some newly independent countries were successful in meeting the domestic and international expectations that came with being a state while others were not. Hence, people and scholars (in whichever order) have—slowly—warmed up to the idea that the state as a juridical concept is no longer sufficient when characterizing reality.

Scholars do not often distinguish a juridical from a sociological or psychological definition and understanding of state. The juridical one is that which is given earlier; it is Weberian, and part of international law. The sociopsychological perspective is one that does not really define a state but, rather, one that designates it, positions it, in the past, at the present, and even an (undetermined) future within the society it circumscribes. Why is defining and/or understanding that role and position of the state so important in the effort of understanding government's role and position in society today? The answer is quite simple. State and government today are hand-in-glove to a degree they never were before. State was a territorial circumscription—that is, property—of an individual ruler or elite, until it became an abstraction—that is, divorced from a living being—and became the entity of a people in one country with an elected representative body. The state today is sovereign, irrespective of who is divined, inherited, or elected as its ruler. Clearly, in terms of international law the 1648 agreement still reigns supreme, and there is then only one type of state. In a sociopsychological perspective, however, there are different types of states and different types of citizens who populate them.

The most well-known distinction is that between strong and weak states. For example, Vigoda-Gadot (2009, p. 8) suggests that if one were asked to divide the world into strong and weak nations, there is little doubt what the resulting list would be. Most probably, a majority of the respondents would put the developed world of wealthy, Western states and some of the richest Asian countries in the column of strong nations, while the poorest countries in the developing world would be defined as weak nations. There would probably be little debate about the political, economic, and military power of each state. Still, one wonders what makes some nations strong, regardless of their military power, natural resources, capital, and geopolitical situation,

and other nations weak, even when they hold several assets of the kind mentioned previously. It is puzzling that states with few resources are viewed both by public opinion and according to objective measures as "stronger" or as "weaker." What is the secret of building strong states, and how can we penetrate this enigma to help governments build stronger nations? In a more conventional view a *strong state* is one that provides security to its people and protects them from foreign aggression, for which there is the military; as well as from internal dangers, for which there are, for instance, police and fire departments. It is also one where government is accepted as the adjudicator in disputes; where citizens can participate in the political process without fear; where people can expect provisions for medical and health care, for education, and for navigable physical infrastructures (roads, railways, harbors); where there is a reliable banking and insurance system; where people can pursue their own dreams; and where civil society is promoted as an important good (Rotberg, 2003, p. 3). *Weak states* perform less well on several or many of these features of a strong state. They may be weak because of environmental constraints, because of economic problems (e.g., lack of natural resources), or because there are significant social cleavages (along, for instance, ethnic, religious, or linguistic lines). Weak states also often experience higher or rising crime rates, and they are often ruled by despots (Rotberg, 2003, p. 4). When a weak state performs poorly on most features it may be on its way to become a *failing state* and even a *failed state* (Chomsky, 2006) that can no longer control its borders and where most institutions disintegrate save the executive arm of government that is controlled by a small power elite. The most extreme type of failed state is the *collapsed state,* which "exhibits a vacuum of authority . . . [that is] is a mere geographical expression, a black hole into which a failed polity has fallen." (Rotberg, 2003, p. 9) These designations of states are not static. Countries have moved from being fairly strong to failing, or from being collapsed to simply weak (for examples see Rotberg, 2003; also Hanlon, 2011).

The designations of strong, weak, and failing states are usually applied to countries at a specific moment in time. For instance, Richard Stillman defined periods in the history of his country in terms of different designations. What makes his analysis interesting is that it shows how much a specific perspective upon the state actually has clear consequences for the nature of its administration.

The *no-state* (or negative state, or *laissez-faire* state) is one with a limited government, mainly responsible for traditional public services (defense, police, justice, taxation). It is the kind of government advocated by the Jeffersonians in the late eighteenth century and by monetarists and public

choice theorists since the 1970s. It is also a government with a very clear distinction between elected officeholders and career civil servants. The latter simply carry out the directives of the former. In its internal functioning it is a highly decentralized government (Stillman, 1999, 175–185, 226–227).

The *bold-state* or (positive state) is pretty much the opposite of the no-state, and is characterized by an expansive government providing a wide range of services. It is also a much more fragmented state with several public, nonprofit, and private actors taking action at national, regional, and local levels (Stillman, 1999, pp. 185–197). The *prestate* (or halfway-state) sits smack in the middle between the no-state and the bold-state, and its advocates are less definite about the role of the state (Stillman, 1999, pp. 197–205). Most important, they point to the existence of a so-called "unwritten constitution," which Don Price describes as ". . . a reflection of the basic political philosophy of the people, of their traditional prejudices and attitudes, often incoherent and not explicitly formulated as important." (Price, 1983, p. 9) This is considered as important as the formal institutional superstructure established by the Founding Fathers. This prestate or half-way-state is somewhat reminiscent of what Huntington labeled a *Tudor polity*, a political system where power is both horizontally and vertically dispersed across a variety of institutions and where, e.g., legislative and judicial functions are fused in some respects (e.g., consider the role of jurisprudence) (Huntington, 1973, pp. 173, 183, and 190). We will get back to this point later, about the United States being a Tudor polity. Finally, the *prostate* (or professional technocracy) is one where government is run by experts, the ultimate administrative state where expert elites in the career civil service know which decisions are best for society. It is, thus, the most antidemocratic of the four types (Stillman, 1999, pp. 205–213).

Earlier in his book Stillman discusses, as he calls it, the "peculiar 'stateless' origins of American Public Administration Theory" (Stillman, 1999, pp. 19–41). He finds, as so many authors before him (for instance, Nettl, 1968, p. 561), that at the time of its creation the United States embarked upon a unique experiment, designing a polity with a very small bureaucracy and with strong suspicion of anything that resembled "state," understood as a top-down, highly centralized polity that acted irrespective of the desires of its population. The Founding Fathers wanted to create a state very different from that of the English, which simply imposed taxes upon the colonies without consultation. This notion of "statelessness" has been very pervasive and also affirmed in Nelson's superb 1982 article where he argued that "the establishment of democratic political

institutions *preceded* the establishment of administrative ones." (1982, p. 775) Indeed, in Europe, state and its bureaucracy had existed prior, and sometimes even centuries prior, to the creation of democratic political institutions through, for instance, the expansion of the franchise. While one can argue that England was the prime example of a stateless society (Nettl, 1968, p. 562) from which the United States adopted many features (for instance, the Tudor polity mentioned earlier), it is important to remember that the term "stateless" is sooner obfuscating than enlightening. After all, the territoriality that is captured in the state concept was reality throughout history. Were there truly "weak" states in the sense that they were strong enough to survive yet did so with only a skeleton bureaucracy? When clinging to Weber's definition of state, the American early state was weak in comparison to European states, but it has been strong from the beginning in terms of the extent to which American government was able to shape civil society. Novak unmasked the "weak" American state as a myth, pointing out the fact that state power is hidden; that is, widely distributed across a multitude of institutions at all levels of government (Novak, 2008). Classic state theory assumes strong state power at the center; it does not consider the possibility of political power as being dispersed, and not only limited to public organizations but including nonprofit and private organizations as actively involved in governance.

To bolster his argument, Novak calls upon the distinction Michael Mann (Mann, 1986b, p. 115) made between two types of state power: despotic and infrastructural power. *Despotic power* is exercised by a small power elite that can do whatever it likes and whose actions go unchecked by other societal institutions. In democracies despotic power is weak, while *infrastructural power*—the capacity of the state to shape civil society and successfully pursue policies throughout the territory—is strong (hence, also a strong bureaucracy). In feudal societies both despotic and infrastructural power are low (for example, medieval Europe), while both are high in authoritarian polities (Nazi Germany, former Soviet Union, People's Republic of North Korea). In imperial (or patrimonial) systems despotic power is high, but the penetration of society is low (which holds for most empires to varying degrees, such as, for instance, ancient China). In modern democracies, clearly, the possibility of despotic power is severely curbed but the ability of the state to shape its society is high. By all accounts, once the United States had shed the Confederacy, it became a strong state given its growing capacity to penetrate society. This type of strong state survives because the political and economic institutions allow full participation and development of its citizenry; it is as Acemoglu and Robinson

named it: an *inclusive state*. We agree with Michael Mann that true stateless societies were primitive (1986b, p. 119); that is, they existed before the creation of formal political institutions. In other words, the concept of "weak state" is not really helpful in describing the current situation in which any state finds itself.

When using designations such as strong, weak, or failing states, etc., we should therefore adopt a sociopsychological perspective that really asks: in whose eyes and by what criteria? Clearly the Western conception of state dominates when the political, social, economic, and cultural situation in non-Western states is evaluated. And, equally clear, the situation in non-Western countries has been evaluated in terms irrelevant to it. Pierre Englebert and Denis Tull convincingly argued with regard to Africa that assessments of the plight of non-Western countries are flawed because they assume that Western state institutions can be successfully transferred, that Western donors and African leaders are cooperating, and that donors can marshal the resources for long-term state reconstruction (2008, pp. 110–111).

Meanwhile, the juridical notion of state has come under fire in the Western world for at least two reasons. First, the concept of *governance,* as it emerged from the 1980s on, emphasizes that the state is not the only actor responsible for governing of society. There are, in fact, multiple actors in the nonprofit and private spheres that contribute significantly to the steering of society. Indeed, nonstate actors are increasingly involved in the delivery of social services, a trend captured in the concept of the *hollow state* (Milward and Provan, 2000). Second, while the state in the international arena is formally still the only actor that can make binding decisions for its population as a whole, in practice it cannot but accept the increasing involvement of subnational and supranational actors in defining domestic and global policies. This is perhaps most clear in the European Union, but has really happened everywhere.

Is the *strong* or *active state* a thing of the past? Perhaps this question cannot be answered unless we can show that the strong or active state, defined as one where government provides the bulk of services, actually existed. We suggest that a democratic strong or active state never really existed, in the sense that states and their governments have always shared power to a smaller or larger degree with other social institutions (most prominently with organized religion, but one could add in the past 170 years labor unions and voluntary associations). Sharing power with citizens in a democratic state is also known as the bureaucracy-democracy paradox and is widely discussed in extensive literature (for instance,

Gawthrop, 1998; Goodsell, 1983; Vigoda-Gadot, 2009). If anything, the democratic state has been an *enabling state* where government allows to a smaller or larger degree service provision by other actors (for instance, voluntary, private, semipublic, regional/local government, and arms-length agencies) (see for discussion Page and Wright, 2007, pp. 3–5). The state, however, not only enables other actors to partake in the governance of society; it most certainly supervises the activities of other actors and provides a legal framework within which government, nonprofit, and private actors can and have to act. Placing the responsibility for the delivery of public services in the hands of other actors increases the need for accountability and centralized rulemaking, thus for an *enabling framework state* (Raadschelders and others, 2007, p. 310). The institutional framework within which governance manifests itself is in a legal sense still decided by those who have been designated to design the state; that is, those whom the people have elected into legislative office. So, the enabling framework state is also an *ensuring* state (Schuppert, 2003) that guarantees the delivery of public or collective services even when private actors are responsible for providing them (through contracting out, public-private partnerships, or collaborative governance).

States and their governments are regarded as legitimate when the population accepts their actions. While some policies target specific groups within a given population, there are many policies that concern the people as a whole. No matter how differentiated in an ethnic, linguistic, and cultural sense, a population is frequently treated as if it is one *nation*, a concept that initially denoted a homogeneous community of people with a shared language and history and close kinship ties. The concept of *nation-state*, then, denotes a close relation between a people and its territory; that is, assumes that at least 95 percent of its population shares a common ancestry. There have been, however, very few such nation-states in the history of humankind. City-states may have been fairly homogeneous, but empires certainly were not. One example of a true contemporary nation-state is that of Iceland, where the large majority of the population can actually trace its ancestry back to the tenth century of the Common Era. Almost all other states in the world are at best *territorial states* because their populations consist of people from various backgrounds. Especially in the Western world, population diversity has been increasing since the 1960s with the immigration of political and, more important in terms of numbers, economic refugees (Arnold, 2010). In the non-Western world, populations are as diverse, but then often as a consequence of having been "thrown" together by colonial powers carving up territories in foreign lands without

knowing anything about existing or previously existing indigenous tribal boundaries or polities (Davidson, 1992) and unaware of its urban past (Davidson, 1987). The story of state making is in the case of Europe indigenous; in the case of much of the rest of the world, at first sight it appears simply imposed.

State Making: Models and Explanations

It is not so long ago that the world was littered with thousands of polities in various stages of institutionalization but always with some sense of boundaries. In the more "primitive" societies these boundaries may have been somewhat fluid, but they generally were respected and mainly defined by kinship ties (Diamond, 2012). In other words, even a band can be considered a polity. Some such "primitive" societies still exist today (for instance, the !Kung in the Kalahari Desert). However, in many parts of the world and as people increasingly became sedentary, more complex polities emerged: chiefdoms, city-states, federations, kingdoms, empires, and theocracies. The territorial state (we prefer this term instead of nation-state) is the dominating polity in today's world and is of fairly recent origin and has its roots in Europe. Let us first look at the numbers. Charles Tilly describes how in the year 1200 CE the Italian peninsula alone was carved in 200 to 300 city-states; the entirety of Europe was fragmented into hundreds of principalities, bishoprics, city-states, counties, duchies, and so forth. Around 1490 there were about 500 would-be states, statelets, and statelike organizations (1990, pp. 40–42). Since then the number of states first declined until the early nineteenth century, only to increase from then on.

From the late Middle Ages the territorial states slowly but surely increased their authority upon the cities, especially in Poland, Russia, and Sweden (Pounds, 1990, p. 206). By the early nineteenth century there were some 25 territorial states in the world, most of which were in Europe, and several new states were being established during the independence movement (the first decolonization) in Latin America. In 1914 there were 55 territorial states; 59 in 1919; and 69 in 1950. Because of the second decolonization period, starting in Asia right after the Second World War and spreading to Africa within a decade, this jumped to 90 in 1960. In 2002 there were 192 territorial states (Rotberg, 2003, p. 2). The long trend has been one of diminishing types and numbers of polities, while the territory circumscribed by the territorial state has significantly increased (Chase-Dunn and Hall, 1997, p. 207). There are numerous explanations for why

this happened, but it is not our intention to summarize scholarly debates, so here it is worthwhile to mention at least one explanation that is less common than other explanations. In a recent article Andreas Wimmer and Yuval Feinstein provided an overview of the literature concerning why the nation-state (as they call it) proliferated across the globe. While so far we assumed that this happened because of colonization, that is, one of the traditional explanations, they find that the nation-state spread across the globe because of contagion: nation-state development in one area spilled over to adjacent areas (2010, p. 770). It is thus that they conclude upon careful quantitative analyses of various factors that "the almost universal adoption of the nation-state form . . . emerges from local and regional processes that are not coordinated or causally produced by global social forces." (Wimmer and Feinstein, 2010, p. 785) We find this conclusion all the more important in light of the argument we made in Chapter 2.

We can infer from the discussion in Section 2 that state making is a process that has international and domestic dimensions. State making is also a process with exogenous and endogenous dimensions (see Table 4.1).

Exogenous models of state making concern political centralization, the process whereby the political power within one territory is concentrated in the hands of one person and/or one body (such as governing institutions). Power in society is initially exogenous to government, and the process of concentrating that power into the hands and offices of actors clearly defined as governmental is slow but inescapable. Consider the case of medieval France. The king as overlord had little political power over the regional dukes. They had political power in their own right. Once the

TABLE 4.1. PATTERNS OF STATE-MAKING (ADAPTED FROM RAADSCHELDERS, 2003, P. 144)

	Exogenous: Political Centralization	Endogenous: Administrative Centralization
International	Sovereignty; independence vis-à-vis other states	Declining independence; loss of sovereignty; integration of states
Domestic	Relation between state and government on the one hand and society on the other	Primacy of politics; political-administrative relations

French kings succeeded in subordinating the regional political powers under their crown, we can say that political power has centralized. The international dimension is that the political institutions of the territory of that state are acknowledged as authoritative by peers. When political actors of a state are not regarded as authoritative, which is usually because of crimes against humanity or extreme despotism, then the international community may look for another set of actors. Domestically a state must be accepted as the only actor that can make binding decisions on behalf of all people living in its borders, and that includes expatriates (those working in the foreign service) as well as people with a foreign nationality (e.g., resident aliens, for instance, in the United States).

There are two types of exogenous models. The English-French pattern is characterized by early unification of the territory under one ruler whose authority is slowly expanded from one center outward. Political centralization is easier when the territory is well defined in terms of physical boundaries such as seas or mountain ranges. The German pattern is one of late unification, mainly because of great diversity of landscape and societies. The German lands had been ruled by hundreds of states since the Middle Ages, but because of conquest, marriage, and consolidation, there were about 300 left in 1800, loosely held together by the Holy Roman Empire. At the Vienna Conference in 1815 that empire was dissolved and replaced by a German Confederacy of 39 states. Fifty-six years later the German Empire was created out of 27 constituent territories. Earlier we saw that this pattern is also characteristic for Italy.

Endogenous models are focused on administrative centralization, the process through which all administrative activity is subjected to the political authority of one person or body. We call these models endogenous because administration in government is subjected to institutional and/or individual actors who are invested with political power. Thus, administration is internal to government. The core domestic feature of endogenous models is that of the primacy of politics over administration. The international dimension is somewhat awkward, in that increased intertwinement of states results in loss of independence and sovereignty to some degree. Also, even though political officeholders still are "on top," in the international arena expert civil servants increasingly participate in policy and decision making. This is especially clear in the European Union.

As with the exogenous models, there are two types of endogenous models. In the English model state making proceeds on the basis of a unified yet decentralized structure that operates on the basis of a strong and cooperative local government. It also features a tradition of amateur government, which is

a government that is run by gentlemen and does not require many experts. Given the fairly substantial autonomy of subnational jurisdictions, most of these amateurs are recruited from among the local or regional landed elites. This pattern is also found in the Dutch Republic up to the late eighteenth century. A tradition of amateur government in England actually lasted until the 1960s, given the Oxbridge background (history, philosophy, languages) that Whitehall civil servants were expected to have. We find a tradition of amateur government also in the United States up to the late nineteenth century. However, this characterization is somewhat stereotypical and depends too much on the contrast between the English and American experience on the one hand and the French and German experience on the other. English administrators were not that amateurish, and neither were their American brethren (Fischer and Lundgreen, 1975, p. 460; Cook, 2012). The German-French pattern is one with a unified and centralized administrative structure, a subordinate subnational government, and a class of civil servants trained in specific administrative skills. This model emerged in the second half of the seventeenth century, and the publication of the first handbooks of public administration and the creation of university chairs in public administration illustrate this development. In fact, public administration as a pursuit and study becomes more and more secular in orientation and clearly linked to the state. To understand how this came about we need a brief excursion into the separation of church and state.

The Separation of Organized Religion and the State: A Recent Phenomenon?

In 1983 the American anthropologist Edward Hall noted, "The novelist and the poet reflect the principal preoccupations of people and their times." In that spirit we defer to Victor Hugo's *Les Misérables*. Victor Hugo's masterpiece became a TV movie in 1978 and a musical in 1985. A big-screen musical version was released in 2012. Obviously, the TV movie does not have all the detail of the book, but there is one scene where the meaning of the French Revolution is captured better than in the book. Toward the end, Jean Valjean and Inspector Javert meet again in the sewers in Paris. This time, Valjean holds a gun in his hand and Javert tells Valjean to shoot him. The latter responds that he cannot, remembering that once his life was bought for God. Valjean, of course, is thinking of the bishop who had given him shelter after his flight from the galleys, and from whom he had stolen

some silver tableware and candleholders. Caught by the police, he was taken to the bishop's house to inquire whether, indeed, the bishop had given the silverware to Valjean. The bishop, looking intently at Valjean, confirmed the latter's story, noting that Valjean needed it more than himself. Javert is unaware of Valjean's motives and answers, "There is no God. There is only the Law. Good and evil do not exist outside the law." A few hours later Javert commits suicide.

This dramatic exchange captures beautifully one of the main events in the aftermath of the French Revolution: the *de iure* separation of church and state relegating the church and spirituality to the private realm, while the state in its secular appearance occupies the public realm. It also underlines the extent to which the tables are turned: The state dominates the public realm, the church, no longer. Looking back, it is really amazing how much some people are in tune with their own time. Consider the following observation by Catherine the Great, czar of Russia, uttered somewhere in the later part of the eighteenth century: "Me, I shall be an autocrat: that is my trade; and The Good God will forgive me: that is His." This remark would have been inconceivable, even only decades earlier. After all, monarchs ruled by divine right and were crowned by the church. The contrast between Charlemagne's coronation as emperor by the Pope in the year 800 and Napoleon crowning himself emperor in 1804 could not be starker.

To be sure, as much as we can say that the changes at the time of the Atlantic Revolutions provided the foundation for the modern role and position of government in society, there was—as De Tocqueville remarked—much continuity as well. With regard to the topic of church and state, their *de iure* separation was enshrined in the first constitutions, those of the United States in 1787, France in 1789, and the Batavian (Dutch) Republic in 1798, but really concluded a process that originated in the eleventh century whereby church and state *de facto* started to demarcate their own spheres of influence. With the advantage of hindsight and in light of history, this drifting apart was both unusual as well as fitting.

That organized religion and state started to drift apart in Europe was unusual because until then they were generally closely intertwined everywhere. In antiquity most, and perhaps even all, rulers played various roles: head of state, head of the army, high priest, high judge, and so forth. From late antiquity on, these roles differentiated, but rulers did govern by a mandate from the divine. The relation between religion and government at the time is perhaps described best by Pope Gelasius I (492–496 CE) in his Two Swords Theory: The church represented the spiritual-eternal world and was superior to the state that embodied the temporal-secular sphere of

power. Almost 600 years later, in 1075, Pope Gregory VII invoked this theory to shore up his argument that the appointment of clergy was solely the prerogative of the Church of Rome and not of kings and princes. His papal decree started a conflict that lasted almost half a century and is known as the Investiture Struggle. It culminated in the 1122 Concordat of Worms that gave the church its coveted control over ecclesiastical appointments. However, from that time on, the state slowly and surely asserted itself in the secular realm, with the church learning that its clergy and flock were increasingly reluctant to side with papal supremacy. Indeed, the people increasingly identified with the state.

Today, state and church are clearly separated in most of the Western world, in much of Latin America, in most African and Asian countries as well as in Australia, and this is illustrated by the fact that most countries have no state religion. This is a recent phenomenon in terms of how widespread this has become across the globe. History is messy, though, and there never really is a clear path from one pattern to another. For example, back in sixth century Byzantium, emperor Justinian was head of state and of church, with the latter being subordinate to the former. And there are still countries with an official state religion, such as in most Islamic countries (except Indonesia); in Denmark, Iceland, and Norway; as well as a number of small (city-) states such as Vatican City and to a certain degree in England. And only in 2000 did Sweden declare the Lutheran Church to be the state religion no longer.

So the separation of church and state was unusual in the sense that hitherto powerful roles and positions in society were often combined in one person, but the separation was also fitting in the sense that territoriality and dominance hierarchies were the two major features of social life in many species, as Richard Dawkins pointed out in his 1976 *The Selfish Gene*. Indeed, human beings are in some respects not so different from other animals.

Territoriality is usually conceptualized in terms of geographical space, but it is clear in this presentation that it can also be defined in terms of authority. And this is not just about who has the right to appoint office-holders, but also about who controls public services. During the Middle Ages, the growing separation of church and state was mainly evident in appointments, and the growing dominance of the state was visible in its levying taxes over clergy. In the early sixteenth century, though, and in the wake of the Protestant Reformation, various services transferred from the church to the state. That is to say, the countries that turned Protestant had a tradition of strong local self-government that had not been disturbed by Roman occupation. It was there, generally, that services in the areas of

education and health voluntarily changed hands, with local governments taking over responsibilities from the church. Especially education was an area where church and state interests clashed. In France and Russia it was not until the nineteenth century that church-controlled schools were seized by public authorities. In countries such as Denmark, England, and the Netherlands, governments set up a system of nondenominational and vocational schools. With regard to hospitals, during the Reformation in northern Europe they simply were seized as part of the effort to take church property. In countries such as Spain and Italy it was only in the nineteenth century that, under pressure, ownership transferred to the state. In France, legislation since the 1880s assured that hospitals provided care to all and not just to those who were of the right denomination. Protestants in Catholic hospitals faced constant pressure to convert, especially in the face of death; there were forced baptisms; Protestants could even be denied a minister tending to their spiritual needs; and it was rumored that care might be denied if one turned to a hospital of the "wrong" denomination (Azimi, 2002; Dhont, 2002).

While separated by law, in practice state-church relations tend to vary. In Catholic countries, state and church recognize common tasks as in Austria, Belgium, Italy, Portugal, and Spain. In several Catholic and Protestant countries governments support religious organizations, for instance, through the construction of buildings of worship. Examples are France, the Netherlands, and the UK. In mostly Protestant countries, a general religious tax is levied and each citizen can indicate to which denomination her/his money should go, as in Austria, Denmark, Finland, Germany, Norway, and Switzerland. Then there are countries where church and state are strictly separated, as in France. We remember the Islamic scarf controversy in France that drew worldwide attention in the mid-1990s. In the foreign press, the French have often been reviled for their strict adherence to the law of 1905 that served as the capstone legislation of all laws since the 1880s concerning the separation of church and state in all areas, health care and education included. This is where knowledge of history is useful, to say the least, because people who are not French are not familiar with the extent to which Roman Catholic clergy used to proselytize Protestants against their will (Dhont, 2002).

History unfolds and is neither the product of slow, incremental change, nor the product of a process of punctuated equilibrium. Instead, time goes by, some things change, others not, and never in a predictable manner. It is as the historian Trygve Tholfsen wrote: "The cardinal features of historical thinking, then, reflect an interest in the dimension of time in human life.

The historian approaches the past through categories of diversity, change, and continuity." (1967, p. 6) This is as true for the tumultuous years leading up to and following the French Revolution as it is for the seemingly calmer Victorian age. And yet, it was at the time of the Atlantic Revolutions that multiple processes unfolding over centuries culminated and coalesced into a new foundation for government in society. The separation of church and state is as important a cornerstone to Western systems of governance as are the separation of politics and administration and of office and officeholder. And it is fortunate that where positive law reigns supreme, rulers can be and are held accountable to the people.

Nation Building: From Subjects to Citizens

Without doubt the Age of the Atlantic Revolutions represents a watershed in the development of government, and then especially in terms of the development of a new institutional superstructure. People, however, do not change as fast. Major institutional changes such as independence from a colonial power or the change from dictatorship to democracy may seem to happen in the blink of an eye, but people adapt more slowly. The biggest change that was wrought because of the Atlantic Revolutions is that people no longer were subjects and became citizens instead. For centuries, nay millennia, people simply were subjects, with as much as 95 percent of the population without any political power and without any hope of improving their lot. From the late eighteenth century on, though, they increasingly became equal in the eyes of the law.

In all fairness, the notion of a universal community of people dates back to the Stoic philosophy of Zeno (334–262 BCE), who argued that it was impossible to govern sizeable and pluralistic societies without some rational order defined by an encompassing common law (Niebuhr, 1959, pp. 73–75). This idea was put into practice when Roman Emperor Caracalla granted citizenship to all freemen in the empire (212 CE, the *Constitutio Antoniana*), which meant that citizens of Rome or Italy were no longer regarded as superior. The Stoic desire of a universal community of people found its strongest support in St. Paul's letter to the Galatians, in which he pointed out that Jews and non-Jews could sit and share a meal at the same table. The ethics of goodwill and loyalty to those within the covenant was replaced by an ethic of goodwill and loyalty to all (Dodd, 1954, p. 294). Clearly, this did not mean that equality of all was established. Indeed, throughout the world equality before the law would not be spoken of until

the late eighteenth century, and would only be realized to some degree from the mid-nineteenth century and well into the twentieth century.

Zeno's vision of a community of people is echoed in the American Declaration of Independence of 1776 (Gawthrop, 1998, p. 70). It is probably the first government-related document in history that proclaimed that "all men are created equal, that they are endowed by their Creator with certain unalienable rights . . ." and that "to secure these rights, *governments are instituted among men, deriving their just powers from the consent of the governed.*" Thirteen years later, the first article of the French Declaration of the Rights of Man also opened with "Men are born and remain free and equal in rights." It is difficult to imagine the importance of these words today, but with one stroke of a pen people were not just regarded as equal, but—in the case of the American document—actually as sovereign. While sovereignty for time immemorial had rested with a ruler or with a ruling elite, and where governments had existed to serve those in power, sovereignty since the late eighteenth/early nineteenth century was now vested in the people as is expressed in the fact that governments now derived powers from the consent of the governed. Obviously, one sentence did not flip a switch in people, shedding their identity as subjects and remaking them citizens. It would take most of the nineteenth century to turn Americans and Europeans into citizens and into members of their nations.

Nation building is a process that happens in various ways. A country can be built around a specific ethnic core, just as happened in Iceland. In many countries, though, there are other "nations" next to this ethnic core (for instance, the Frisians next to the Hollanders in the Netherlands). This is certainly the case in territories that were occupied by colonizing powers and where the immigrant population became the dominant one (Australia, Canada, New Zealand, and the United States). In African countries it is much more common that the immigrant population remained small, and that there was an ethnic group prior to the creation of the state. In fact, African states often have multiple ethnic groups. Nation building is a bottom-up process that happens when people identify with and codify a particular past, language, and customs as distinguishable from that of other people. This happened in England in the course of the fifteenth and sixteenth centuries. In France it did not happen until the eighteenth century (Greenfeld, 1992, pp. 30–87 and 154–177). In the contemporary world, nation building is more often a top-down effort to assure that people from different backgrounds identify with the state and its government. In the case of top-down nation building, nationalism is a powerful instrument on the part of governments to help tie people together as citizens.

The process where people identify with a country does not happen overnight. Liah Greenfeld may have said that France became a nation in the course of the eighteenth century, but she specifically referred to the final subjugation of territorial lords (such as the dukes of Burgundy and of Brittany) to the monarchy. Hence, by the eighteenth century France had become a state where all political power was concentrated in one body. What about the common French? In a phenomenal book Eugen Weber analyzed how peasants slowly turned into Frenchmen, but that did not happen until the later nineteenth century (1976) and then only as a consequence of various centralizing forces, such as the emergence of railroads, universal military conscription, and the creation of a uniform school system and curriculum throughout the territory. (Nota bene: The idea of a grade-based school system originated with Napoleon Bonaparte and was implemented in France between 1802 and 1808, and has since then spread across the globe.) The same process of slowly becoming a nation unfolded in the Netherlands. Created a unitary state in 1798, the Netherlands did not become a nation until the second half of the nineteenth century (Knippenberg and De Pater, 1988). Regional differences, though, had not disappeared (the old provinces of the Republic). In most European countries, the state comes to express itself through unifying symbols such as a flag and a national anthem in the course of the nineteenth century (Fisch, 2008). Also, states embellish or emphasize certain parts of the historical past that citizens can be proud of by, for instance, creating monuments celebrating famous events or people. Upon independence, all states create such symbols of unity. That people identify with a state through very abstract symbols is thus of very recent origin. Finally, a continuum of the evolving change in the role of citizens in modern nations/states is suggested by Vigoda (2002a). Simultaneously, the relationship between citizens and nations/states is transforming and putting heavier obligation on all the involved parties.

Citizenship as Layered Phenomenon

Equally recent is the idea that citizenship is related to the abstraction of the state rather than to a specific physical-geographical area. Nowadays, citizenship is a multifaceted and layered concept that includes both very concrete as well as very abstract identifications.

First, and concerning concrete aspects of citizenship, it is defined by being an inhabitant of a particular area (city, town, region) by birth. Citizenship is, thus, experienced in a geographical context, and for much of history the

physical environment people identified with is local and, at best, regional. If localities "belonged" to a ruler far away, as was the case in empires, people were not likely to have identified as citizens of that empire. In fact, for most of history people could not fathom a world beyond a 20- to 40-mile radius around their place of residence (Diamond, 2012). In the past two centuries, though, people have been increasingly able to experience citizenship at multiple levels. That is, citizenship is no longer limited to contact with one's neighbors and townsmen; it may now easily include contact with fellow countrymen (i.e., all citizens within a state) and with like-minded spirits in other countries (Heater, 1990, pp. 318 and 323). Indeed, it is through the power of the social media (Facebook, Twitter) that citizens have come to connect with each other across regions and borders despite efforts of the regimes in power to subdue the uprisings that are collectively known as the Arab Spring (2010–present). Finally, there are numerous challenges that are truly global by nature and that cannot be addressed successfully by individual territorial states. Just consider global warming and climate change, economic inequalities and poverty, the financial power of multinational corporations, air and water pollution (for instance, the Pacific Trash Vortex that is suspected to be twice the size of the United States; see sprinterlife.com 2012), the international trafficking of women, and so on.

Another way of imaging the multifaceted nature of citizenship is that it can be seen as operating on individual and collective levels (that is, levels of analysis) as well as on organizational and communal/national levels (that is, settings of citizenry action). Microcitizenship concerns employee behavior in the workplace. Midcitizenship emerges out of the action of an organizational group and includes team-building strategies, quality circles, and so forth. Macrocitizenship refers to altruistic behaviors of individuals in national and communal settings. Finally, metacitizenship regards collective action of citizens in the larger society (e.g., voluntary associations) (Vigoda and Golembiewski, 2001, pp. 283–286).

One might expect that a strong sense of citizenship develops when people feel that they are treated well by their public authorities and, more specifically, are satisfied with the quality of public services. However, research has shown that when people are content, their inclination to engage in active political participation and community involvement declines (Vigoda, 2002c, p. 266). Apparently, when all goes well, citizens do not see the need to be involved.

A second, more abstract notion of citizenship is that it presumes a set of duties and rights that can be respectively expected and enjoyed by those who live in a country. As is clear from earlier, for most of history the majority

of people only had duties. However, once they came to be recognized as citizens in a legal sense (i.e., equality before the law), this had to be translated into specific citizen rights. Thomas Marshall (1965, pp. 78–91) distinguished three types of citizen rights. The first to be established were the *civil rights* that included freedom of speech, freedom of association, and the right to start a business without fear of nationalization. These rights were monitored by the court system. In the course of the nineteenth and twentieth centuries people also acquired *political rights,* such as the right to vote and the right to be voted into office, and this was pursued and supervised by legislatures at the national and subnational levels. Finally, people also were given *social rights* such as universal health care and education. It is access to education that has especially shored up the notion of citizenship, because through it individuals have been socialized into being citizens. Civics classes and courses in national history and government were aimed at helping people transcend their individual identities (especially elements of identity that were/are grounded in religion, region, language, history, and customs) (Heater, 1990, p. 88).

People still identify with a specific region and country, and they can do so in two ways. They can identify on the basis of territory, as is the case with the French; that is, state-centered ideas of citizenship, building upon centuries of state making and followed relatively late by a sense of nation. Or they can ground citizenship in a sense of nationhood, as is characteristic for the German lands, where nation (i.e., an organic, cultural, linguistic, and racial community) preceded state by at least two centuries. Either sense of citizenship comes under pressure when original populations clash with mushrooming immigrant populations. This takes us into the third, most abstract notion of citizenship. The education for citizenship briefly described in the previous paragraph is intended to make people open-minded, tolerant, and respectful of others. In a situation where the majority of the population is homogenous, such education is fairly successful. When nationality and state are closely aligned, immigrants can easily be absorbed into the original population provided their numbers are small. In that situation, citizenship is internally inclusive and externally exclusive (Brubaker, 1992, p. 21).

When internally inclusive it is egalitarian, for providing most inhabitants with the same civil rights while, at the same time, it excludes foreigners. In that case *citizenship is a mechanism for closure,* for it assumes and provides for a self-perpetuating community of people. Marshall's three categories of rights, mentioned earlier, are internally oriented. With increasing international migration since the Second World War, and especially with migration from

developing countries to Western countries (Arnold, 2010), many countries have been moving toward a concept of *postnational citizenship*, where civil and social rights are extended to foreign nationals living in the country. In this case, generally, political rights are not included. This category of citizens is known in the literature as *denizens* (in the United States: resident aliens). Finally, there is *multicultural citizenship,* which sets specific groups of immigrants apart as a protected ethnie (these three types of citizenship—closure, postnational, multicultural—are from Gibney and Hansen, 2005, pp. 86–90).

The traditional meaning of citizenship as one that can be equated with national identity is under stress. A variety of countries seek to manage immigration through policies that emphasize the obligation to not only learn the language but also develop a sense of loyalty and belonging to the new country (Kofman, 2005). And several countries pursue integration policies that are presented as inclusive but are intended to achieve exclusion (Goodman, 2009, pp. 183–184). While state may be a rather static phenomenon when territorially defined, nation is sooner culturally defined, and with growing population diversity in countries governments cannot but support cultural pluralism. After all,

> Culture and cultures are always in flux, and [. . .] individuals normally relate to culture through the acknowledgement of multiple affiliations and allegiances, and through participation in diverse practices, customs, and activities, rather than through association with some fixed and determinate culture. [Thus] . . . states should be maximally accommodating [. . .] the cultural variety that free individuals inevitably exhibit."
>
> (Scheffler, 2007, pp. 105–106)

This is easier said than done. The Netherlands is one of those countries where since the mid-1990s assimilation instead of multicultural policies has been pursued. Citizenship policy today should be targeting the development of a public political culture, where people identify with the state and do not feel forced to abdicate their own culture.

A Future for State, Nation, and Citizenship?

No matter how we look at it, the territorial state is still the dominant type of polity. It is true that other actors are increasingly visible as participants in the provision of collective services. This is generally referred to as *governance,*

and then often presented as if a new phenomenon. We argue that it is anything but. Formal government organizations have throughout history worked with other societal organizations such as organized religion and (in Europe) trade and craft guilds. If the state is hollow in the range of services it provides itself, it is still very much a key actor in defining public policy. We have to reiterate here that the state is the only actor left that can act with authority (and thus legitimacy) on behalf of the citizenry at large. It may not be anything more than that, but it certainly is not less.

In the past century *state* has been coupled with *nation*, but this may be born more from nostalgia for a community that never existed than from the realities on the ground. The true nation-state hardly ever existed, simply because most territories that were defined as a polity had multiple nations, i.e., culturally distinct groups of people, living within their jurisdictions. However, as one of the authors of this book remarked before, once state making and nation building complemented each other, the welfare state, which basically defines and provides social rights, could be born (Raadschelders, 1998b, p. 254). And it is that welfare state that is under siege at the same time as that citizenship has become problematic.

If only territorially and politically defined, citizenship should not be an issue to most people, for it simply extends civil and social rights to the entire population. Citizenship becomes a challenge, though, once minorities acquire sufficient numbers so as to legitimately claim political rights as well. In various Western European countries, second- and third-generation immigrants now hold elective office at the local, regional (provincial), and national levels. Beyond this, concerns about citizenship appear to be mostly driven by the inflated notion that "national identity" is in jeopardy because of large numbers of citizens of foreign descent. In that view citizenship becomes an object of narrow-minded nationalism, and, while we think the state is here to stay for a while, that nation when equated with postnational citizenship is here to stay as well; we can no longer afford to perceive citizenship as national identity. Considering the extent that people can travel nowadays, and the extent to which they seek economic opportunity wherever their skills may take them, governments cannot but pursue a policy of multicultural citizenship. Anything less will result in a division between first- and second-class citizens, and would be an affront to anyone who adheres to fundamental equality before the law.

POLITICAL-ADMINISTRATIVE SYSTEMS AND MULTILEVEL GOVERNMENT

We have seen that the world's lands are almost all circumscribed by territorial states, whose governments can be considered the only actors in society that have the authority to make binding decisions on behalf of the entire citizenry. States have been able to centralize and channel political and administrative power. The institutional superstructures of the political and administrative system are very similar everywhere. First, states can be categorized according to a variety of dimensions that are usually presented as dichotomies (Section 1). Second, we need to consider how a country's elite is embedded in the political system: Does it wield power through political parties or through bureaucracies (Section 2)? Third, and recognizable to any one person, is that political power is generally divided across three branches: the legislature, the executive, and the judiciary (Section 3). The administrative structure that operates upon the direction of the executive is generally known as the bureaucracy, and government functions are distributed across multiple departments that in turn are subdivided in multiple units (Section 4). In this chapter we will focus on the overall structural features of this political-administrative—that is, governmental—system. How bureaucracies function in terms of their organizational culture and how they are regarded in their respective societies will be the subject of Chapter 6. The functioning of the political-administrative system in terms of relations between elected and appointed officeholders

and in terms of bureaucracy as a personnel system will be further explored in Chapter 8. There is one more element that befits the structural focus of this chapter. We have already seen that a state's territory is subdivided in at least two, and often more, territorial and layered subdivisions (Chapter 3), and we will have to discuss these again but now in terms of multilevel and multiactor government and governance (Section 4).

Basic Distinctions of Political Systems

As we discussed in Chapters 3 and 4, social stratification will inevitably develop in sedentary communities, and that includes distinctions between those who govern and those who are governed. This paragraph is divided into three subsections. In the first subsection, and following Blondel's categorization (1995), we will briefly discuss five main types of political systems. In this section some attention needs to be given to the type of political *party* system since it is related to the type of political system. However, and strictly speaking, the political party system is not part of the administrative/governmental system. The political party system mobilizes people to participate in the political process, by serving as platform for advocacy, by channeling people's desires and needs into policies and programs, and is (in most countries anyway; the United States is an exception) the body that selects candidates for public office from among its membership. After this excursion into something that is outside the structure of government, we continue characterizing the institutional superstructure of governments. In the second subsection of this section, we outline the distinctions between unitary and federal systems and pay attention to degrees of centralization and decentralization in each. The third subsection is devoted to the comparative typological analysis of democratic systems in general. We then zoom in on the expression of democracy in presidential and parliamentary systems in the fourth subsection.

Five Types of Political Systems in Relation to Political Party System

For most of history, political systems were to a smaller or larger degree based on traditional authority. There generally was one ruler who ruled with support of the social, economic, and political elite of the territory. The population at large had no political rights; hence most historical political systems were inegalitarian by nature. These *traditional inegalitarian political systems,* as Blondel called them (1995, p. 38), are thus basically "absolutist."

Historical examples would include almost all political regimes of sedentary communities across the globe in the past; early modern examples are the absolutist monarchies in Western Europe in the sixteenth to the eighteenth centuries. Blondel labeled these systems as "traditional" because they preserve oligarchy and social inequality, while at the same time retain some degree of popular support. In the contemporary world, this type of regime has become very rare but is still found in the Arabian peninsula, in parts of southern Africa, and in the Himalayas.

Once popular support for a traditional regime is diminishing, a political system may become more *authoritarian-inegalitarian* (Blondel, 1995, p. 39). However, authoritarian-inegalitarian regimes may also emerge in response to problems in a liberal-democratic system (as in the cases of emerging fascism in Italy and national socialism in Germany after the First World War) or in response to failing populist regimes (as has happened in newly independent states in Africa, Asia, and Latin America after the Second World War). *Populist political systems* emerged especially in South America in the earlier nineteenth century and in Africa in the 1950s and 1960s. For such a system to succeed it is important to have strong and charismatic leadership.

Blondel's typology mentions two much more common systems, namely the egalitarian–authoritarian and the liberal democratic systems. Communist countries generally have *egalitarian-authoritarian systems*, and examples include the former Soviet Union, countries in Eastern Europe that were satellites of the USSR, China, North Korea, Mongolia, Vietnam, Cuba, Angola, Mozambique, and Ethiopia. The egalitarian-authoritarian label may seem paradoxical, but Blondel argues that popular unrest in Russia and Eastern Europe since the 1990s suggests that communist regimes were more egalitarian than those that replaced them (Blondel, 1995, pp. 37–38). North Korea has become more authoritarian as well.

Finally, there are the *liberal democratic systems* found in Australia, India, Israel, Japan, New Zealand, North America, several South American states, South Korea, Western European countries, and some countries in Africa and East Asia. We will pay a little more attention to these liberal democratic systems since they have been gaining ground steadily from the mid-nineteenth century on (see subsections following).

One feature of many contemporary political systems is that they have political parties. We will not discuss political party systems in detail, nor electoral systems, nor types of political parties (tribal, ethnic, religious, class-based, and so forth), since this lies outside the objective of this book. However, since it is part of the context in which governments operate, we will pay some attention to it.

In the earliest human communities, we assume that the bonds of band and tribe must have been strong enough to deal with interpersonal conflict and collective challenges. There is no archaeological evidence of formal political institutions in hunter-gatherer societies, let alone political parties. Most historical political systems had formal political institutions, but there were no political parties. Rulers came to power on the basis of hereditary right or military might. In such *no-party systems* the local community must have been strong enough to manage collective needs. Whether people felt any conflict with the center or had different opinions about the structure of the society at large, its organization, or its policies, we do not know. We do know, however, that sometimes they successfully rose in revolt, and the best examples are the American and French Revolutions. In the modern world there are very few no-party systems left (Blondel, 1995, p. 154). Most of these are found in the Arabian peninsula. The no-party systems in Afghanistan, Ethiopia, and Libya were replaced by single-party systems in the second half of the twentieth century. In the 1970s and 1980s, military regimes in African, Latin American, and Middle Eastern countries abolished political parties, but those regimes proved unstable, and they are in decline since the 1990s. With an eye on the Arab Spring since 2010, it seems that the legitimacy of one- or single-party systems is increasingly under siege. Rulers have been forced out in Egypt, Libya, Tunisia, and Yemen. There have been civil uprisings in Bahrain, and they are still (at the time of this writing) ongoing in Syria. Major civil unrest occurred in Algeria, Iraq, Jordan, Kuwait, and Sudan; minor civil unrest has been observed in Lebanon, Mauritania, Morocco, Oman, Saudi Arabia, Djibouti, and the Western Sahara.

In earlier times there may have been prepolitical "parties," and those are termed "factions." One example are the factions in the Senate of the Roman Republic, some supporting the republican ideal, with others leaning more toward monarchy (especially in the swirling debates around what Julius Ceasar wanted: to be king or not). Another example is the seventeenth and eighteenth century Dutch Republic of the Seven United Provinces, where two factions strove to realize their view of the desired political system. The Orange Faction wanted a confederacy with a strong stadtholder in the person of the Prince of Orange-Nassau. The State Faction favored a confederacy where the highest-ranking confederate official/civil servant (that was the State-Pensionary) would be running the republic's business. (On a side note: Some political parties in the contemporary Dutch kingdom favor monarchy while others advance the notion of a republic.)

Political parties are unique to the modern world. They emerged in the nineteenth century, at the same time as or in the slipstream of the

appearance of labor unions. The position of the people evolved and changed dramatically as well: from people as subjects to people as citizens with rights, and not merely obligations. Those citizens then turned into voters (Vigoda, 2002a). People as citizens (see Chapter 4) discovered the freedom of association and found strength in numbers. Political parties and labor unions also became a mechanism, and they networked to link citizens to local, regional, and national levels. It helped that, at the same time, newspapers became widely available to the public at large.

No-party and single-party systems are not particularly stable, for both may suppress discussion of conflict (the following based on Blondel, 1995, pp. 156–158). *Single-party systems* have been a feature of totalitarian governments under communist, fascist, or national-socialist regimes. Also, many single-party systems emerged in Africa after independence, but these were often toppled by military coups. There are/have been countries where one party is so dominant that it dwarfs the others (Egypt, Madagascar, Mexico, Nicaragua, Singapore, and Taiwan) (for more detail on single-party systems, see Blondel, pp. 159–163).

Two-party, two-and-a-half party, multiparty with dominant party, and multiparty without dominant party systems (the distinctions from Blondel, 1995, pp. 170–171; the brief discussion below also Blondel, 1995, pp. 171–179) generate competition among various groups, but it is impossible to characterize countries simply because "times they are a-changing." For instance, until the 1970s Austria, New Zealand, the United Kingdom, and the United States had a *two-party system*. Looking at Britain only, in the 1970s the Liberal Party emerged, marginalized in the 1990s, and is currently (2013) the junior partner in the cabinet. The great disadvantage of a two-party system is the potential for severe politicization. This is no better illustrated than with the example of the United States. That the White House and Senate are in Democratic hands, and the House controlled by the Republicans since 2010, has resulted in serious gridlock. Another problem with the two-party system, also known as the first-past-the-post system, is that the winning party may well engage in "na-na boo-boo politics," that is, a politics that generates an attitude of "now that I'm in power I'll reverse some of the previous administration's decisions." That a two-party system can work is shown by, for instance, Germany since the Second World War and the United States in the 1960s and 1970s.

Two-party systems are also known as majoritarian systems, since one party has a majority in the legislature. Multiparty systems are referred to as consensual systems, since no party has or is expected to gain an absolute majority in the legislature. Examples of these include France, Israel, the

Netherlands, and Nigeria. In these countries, ministerial cabinets are generally coalitions of parties. As an introduction to the next subsection we refer to Arend Lijphart's work, that established how consensus democracies generally "demonstrate [. . .] kinder and gentler qualities . . ." They are usually welfare states, incarcerate fewer people, are more generous with development aid, and are better at protecting the environment (1999, pp. 274–275).

Unitary and Federal Systems

We have seen in Chapter 3 how states came to define jurisdictions at the subnational level: first at the regional, and then at the local level. Hence, states can also be characterized in terms of the basic relations between the national and the subnational levels of government. In *unitary states* the authority of subnational levels of government is granted by the national level. The large majority of states in the world have a unitary basis. In *federal states* the national level of government generally shares sovereignty with (usually) the regional level of government. The local level in a federal state, though, derives its authority from the regional level, and is therefore in a unitary relation. Federal states are often large in terms of territory, and examples include Argentina, Australia, Brazil, Canada, Ethiopia, Germany, India, Iraq, Mexico, Pakistan, the Russian Federation, Spain, Venezuela, and the United States. There are, though, also smaller federations such as Belgium, Bosnia and Herzegovina, the Comoros islands, St. Kitts and Nevis, and Palau (also known as Belau).

Within federal systems a distinction can be made between dual and cooperative federalism. In the case of *dual federalism* (also known as layer-cake federalism) authority and responsibilities of the federal level are clearly demarcated from those of the subnational levels. It has been argued that the United States in the nineteenth century was an example of this, but most scholars argue that it was theory rather than reality (Elazar, 1966; O'Toole, 2000; Wright, 1988, p. 67). The reality in the United States is one of *cooperative federalism* (also known as marble-cake federalism) where the different levels of government are together active with and responsible for policy making and service delivery. An excellent visual illustration of that is the intricate and expansive cooperative structure of early childhood education programs in Minnesota (Sandfort, 2010, p. 640).

Several types of federal systems have been distinguished in the literature (see Watts, 2008, pp. 10–11) but for the purposes of this book these need not be discussed, except for one. A *confederal political system* is where political

TABLE 5.1. CHARACTERIZING STATES I: UNITARY–FEDERAL AND CENTRALIZED–DECENTRALIZED DIMENSIONS (EXAMPLES)

	Unitary	Federal
Centralized	France, Italy, China	High: Malaysia
		Medium: Brazil, Nigeria, Australia, Mexico, Austria, Spain, South Africa, Russia, United States, India
Decentralized	Israel, the Netherlands, Scandinavian countries, United Kingdom	Belgium, Germany, Canada, Switzerland

Legend: The characterization of federal and centralized states is based on Watts, 2008, p. 177.

power rests with the constituent parts. Historical examples include the United States (1774–1787) and the Dutch Republic (1581–1795); contemporary examples include the European Union, Serbia and Montenegro, and Switzerland.

Having a unitary or federal overall structure is not a static situation. Countries have shifted between being a confederal, federal, and unitary political system (for instance, Argentina, Germany, Mexico). More important, though, is that unitary and federal states vary in the degree to which they are centralized or decentralized (see Table 5.1). Following Ronald Watts (2008, pp. 171–177), a single dimension does not exist upon which the degree of autonomy of subnational governments can be determined. Instead, we need to consider several: legislative, administrative, and financial decentralization; constitutional limitations; and the nature of federal decision making. For detail on each of these dimensions we refer to Watts, but we shall provide some examples. For instance, the Netherlands is characterized as a decentralized unitary state. Close to 90 percent of local government revenue is dependent upon transfers from national government, but in every other respect Dutch municipalities have considerable autonomy.

The distinctions between countries are not as clear-cut as may be suggested when looking at Table 5.1. For instance, since the *Loi Deferre* (1982), France has become more decentralized. Indeed, in any country the

TABLE 5.2. CHARACTERIZING STATES II: EXECUTIVE GOVERNMENT AND (DE)CENTRALIZED DIMENSIONS

	Nature of Executive Government		
	Majoritarian	**Intermediate**	**Consensual**
Centralized (unitary) (Lijphart: majoritarian)	New Zealand, United Kingdom	France	*Australia, Austria, Canada, Germany,* Italy, Netherlands, *United States*
Intermediate	*Iceland, Luxembourg,* Sweden	Norway, *Sweden, France V*	Finland, *Italy, Japan*
Decentralized (federal) (Lijphart: consensual)	Australia, Canada, United States	Belgium, Germany, *Finland, France IV,* Netherlands	*Switzerland*

Source: When italicized the countries are from Lijphart, 1984, p. 219; when nonitalicized they are taken from Pollitt and Bouckaert, 2011, p. 55. (Nota bene: We did not include Lijphart, 1999, p. 248, because in the 1999 edition he used an executives–parties dimension rather than a majoritarian–consensual dimension.)

political-administrative system is to a larger or smaller degree always in flux. This can be illustrated by considering the reform capacity of various countries as Christopher Pollitt and Geert Bouckaert have done. The latter base their table loosely on Arend Lijphart's work (Lijphart, 1984, p. 219 and Lijphart, 1999, pp. 110–111 and 248), but look in Table 5.2 at the different positions of Australia, Canada, Finland, France, Germany, and Sweden when comparing Lijphart's characterization with that of Pollitt and Bouckaert. It is likely that there have been changes in the past 25 years, but there could be another explanation. Lijphart characterizes political party systems in terms of whether they are majoritarian, intermediate, or consensualist, and these characteristics occupy both the X- and Y-axes. Thus to Lijphart the most majoritarian countries are New Zealand and the United Kingdom, while the United States is listed as majoritarian-consensualist (the most consensualist is Switzerland). Pollitt and Bouckaert's X-axis holds the same three types of systems as Lijphart's matrix

does, but their Y-axis emphasizes the degree of (de)centralization combined with the extent to which a country can be labeled as unitary or federal. In other words, Pollitt and Bouckaert actually developed a more insightful table by combining two dimensions (nature of executive government; unitary to federal system).

Political systems can also be categorized in terms of their ability to reform. Pollitt and Bouckaert distinguish five features of political-administrative systems: state structure, nature of executive government, political-administrative relations, dominant administrative culture, and degree of diversity of stakeholders who provide policy advice. In this chapter we focus on state structure and the nature of executive government. In Chapter 6 we address the administrative culture, while in Chapter 8 we will consider political-administrative relations and those who are involved in policy advice.

Pollitt and Bouckaert define state structure as the extent to which authority is shared between levels of government (the vertical dimension) and the degree to which policy is coordinated at the national level (the horizontal dimension) (2011, p. 51). In Table 5.3 you can see their characterization of each state as federal or unitary and as centralized or decentralized, but now including the degree to which they are coordinated. We have added Israel to this table and added "decentralized" to their assessment of the Netherlands. The second element of coordination concerns the extent to which one or two national government departments drive reforms. In that sense, for instance, the Netherlands is fairly coordinated (the Departments of Home Affairs and of Finance), but a variety of reforms have been spearheaded by the Council of State, top political and administrative executives, specially appointed state committees, and external actors (e.g., at the time of the French and German occupations, 1795–1813 and 1940–1945, respectively) (Van der Meer and Raadschelders, forthcoming). What is puzzling is that in their table Pollitt and Bouckeart label Germany as a coordinated system, but at the same time they argue (p. 54) that reform capacity is highly fragmented between a multitude of arenas and actors.

The second dimension Pollitt and Bouckaert discuss is the nature of the executive government, i.e., the cabinet, and they distinguish between four types:

- Single party, or minimal winning, or bare majority,
- Minimal-winning coalition where two or more parties have a little more than 50 percent of the legislative seats,
- Minority cabinets, and
- Oversized executives or grand coalitions.

TABLE 5.3. EXAMPLES AND CHARACTERISTICS OF UNITARY AND FEDERAL POLITICAL SYSTEMS

	State Structure	Executive Government	Minister–mandarin Relations	Administrative Culture	Diversity of Policy Advice
Australia	Federal, coordinated	Majoritarian	Separate, mildly politicized	Public interest	Mainly civil servants until 1980s
Belgium	Federal	Consensual, though increasing politicization	Politicized	*Rechtsstaat*	Consultants and universities
Canada	Federal	Majoritarian	Separate	Public interest	Mainly civil servants, but increase of political advisors since 2000
Finland	Unitary, decentralized, fairly fragmented	Consensual	Separate, fairly politicized	Was *Rechtsstaat*, now more pluralistic	Mainly civil servants
France	Unitary; formerly centralized, coordinated	Intermediate	Integrated, fairly politicized	Mainly *Rechtsstaat*	Mainly civil servants, some consultants since 2000
Germany	Federal, coordinated	Intermediate	Separate, fairly politicized	*Rechtsstaat*	Mainly civil servants, some academics
Israel	Unitary, coordinated	Coalition	Separate, fairly politicized	Mix *Rechtsstaat* and public interest	Civil servants, consultants, academics
Italy	Unitary, increasing decentralization	Coalition	Politicized	*Rechtsstaat*	Broad mixture
Netherlands	Unitary, decentralized, fairly fragmented	Consensual	Separate, fairly politicized	Originally legalistic, increasingly pluralistic and consensual	Broad mixture of civil servants, consultants, academics, other experts

New Zealand	Unitary, centralized, mildly fragmented	Majoritarian until 1996	Separate, not politicized	Public interest	Mainly civil servants
Sweden	Unitary, decentralized	Intermediate	Separate, increasingly politicized	Originally legalistic, changed to corporatist	Broad mixture: academics, business leaders, trade unions
United Kingdom	Unitary, centralized, coordinated	Majoritarian	Separate, not politicized	Public interest	Mainly civil servants until 1980; recently think tanks, consultants, political advisors
United States	Federal, fragmented	Intermediate	Separate, very politicized	Public interest	Very diverse: political appointees, corporations, think tanks, consultants

Source: adapted and expanded from Pollitt and Bouckaert, 2011, p. 50.

This is in part related to the type of political party system. *Majoritarian systems* are generally two-party systems, while multiparty systems are by necessity more consensual. They find that speed and severity of management reforms decline when moving from the left to the right in Table 5.2. They also note that the scope of reform, which is defined as the amount of public-sector tasks and services that is affected by reform, declines when moving from the top to the bottom in Table 5.2. It is thus that they conclude that deep and rapid structural reforms are less difficult in majoritarian countries. Also, the more centralized a political system is, the less difficult it is to pursue reform (Pollitt and Bouckaert, 2011, pp. 55–56). We need to keep in mind, though, that these conclusions only pertain to Western countries; it may well be that in centralized developing countries reforms are not so easy to pursue. And then, as they observe, there is variation among majoritarian countries as well. In the United Kingdom the prime minister has far more control over his party members in the legislature than the American president has (Pollitt and Bouckaert, 2011, p. 58).

Goran Hyden has also looked at the executive capacity or rationality of political systems but then in relation to their legality or rule conformity and situating entire world regions in his matrix. He characterizes Western Europe as strong in rationality/executive capacity and firm in legality; the United States as weak in rationality/executive capacity and firm in legality; Asia and Latin America as soft in legality but strong in rationality; and Africa and Eastern Europe as soft in legality and weak in rationality (Hyden, 2012, p. 605).

Typologies of Democratic Systems

Imagine living in a close-knit group and moving from one place to the next in the search for food. Such hunter-gatherer groups are, in a way, direct democracies. Everybody knows everybody else, and interpersonal conflict is settled within the group by noninvolved individuals. In sedentary societies, people quickly will no longer know everybody else, and it is then that institutions are created that help meet collective needs and adjudicate in the case of interpersonal conflict. While we discussed this already in Chapter 2, it is important to reiterate this. While for most of history the majority of people lived as mere subjects, it is in the last two centuries that they have become citizens who partake in indirect, representative democracy through passive and active voting rights. Since the Atlantic Revolutions people in democracies are considered equal in the eyes of the law. Obviously, they are unequal in a social sense and—*chapeau* Robert

Michels—some will always be more powerful than the multitude. What is it that makes large-scale democracy work? Is it not amazing that in democratic societies with thousands, millions, and—sometimes—hundreds of millions of people, violation of private rights by government is actually quite limited? That is to say, it still happens but is considerably less than in earlier times or in nondemocratic states. Sure, superficially we could point to the existence of sanctioning systems, such as a police force and a judiciary; but no sanctioning arrangement can handle a society where everybody violates the law.

Hence, deeper down, there is something else about (liberal) democratic societies that actually makes them more fair and effective, and that is not an array of institutional arrangements but rather an individual attitude. And here it is fitting to quote Mill:

> The only freedom which deserves the name, is that of pursuing our own good in our own way, so long as we do not attempt to deprive others of theirs, or impede their efforts to obtain it. [. . .] Mankind are greater gainers by suffering each other to live as seems good to themselves, than by compelling each to live as seems good to the rest." (Mill, 1983, p. 72)

The reader may be more familiar with the following two quotations by Mill that can be found when googling the word "freedom." The first: "I have learned to seek my happiness by limiting my desires, rather than attempting to satisfy them." The second: "Your freedom to punch me ends where my nose begins." (Nota bene: We tried to find the source of these quotes but were not successful.) Mill's observation is nothing else but a secular version of the Golden Rule: *Democracy will thrive through self-restraint and is learned, not imposed.* But how can societies get to that point?

Perhaps communal life within nomadic bands was/is relatively peaceful; the high degree of social control assuring that interpersonal conflicts will not get out of hand. But how can collective challenges be met and interpersonal conflicts settled when people start living together in ever-larger concentrations without knowing one another? The answer is that it is possible through the establishment of institutional arrangements that are structured around emergent and solidifying social stratification. The territorialization and bureaucratization of the world are top-down processes that work as long as people have not figured out how to create and maintain a large-scale self-governing system. From the extensive research done by Elinor Ostrom (1990) and many others in her orbit we know that

people can govern themselves successfully, but only on a relatively small scale. The first large-scale experiment with democracy is that of the United States, certainly large in territory from its beginnings, and increasingly large in terms of population. The democratization of the world started in the late eighteenth century and has not stopped since. There were not many indirect and representative democracies in the early nineteenth century. By the early 1970s there were 39 democracies in a total of 150 countries (= 27.3 percent) (Diamond, 2002, p. 2; on p.58, Table 1, he lists 41 democracies). By 2002 this had increased to a total of 121 democracies among a total of 192 countries. This is as much a function of copying behavior, of multilateral donors desiring democratic reforms, as it is of normative diffusion through an underlying network of intergovernmental and international nongovernmental organizations (Torfason and Ingram, 2010).

That democracy has tripled by the early twenty-first century so that more than half of the world's countries can to a smaller or larger degree be labeled as a democracy is great, but these numbers do not tell the whole story. Even though the percentage of states rated as "free" by Freedom House increased from 29 percent in 1972 to more than 46 percent in 2002 (Torfason and Ingram, 2010, p. 59), the percentage of "illiberal democracies" has increased as well. Liberal democracies with fair, free, and frequent elections, with a rule of law, an independent judiciary, checks and balances of and upon (political) power, and with the protection of human freedoms accounted for a little more than 81 percent of all democracies in 1974, while only for almost 61 percent in 2002. In other words, "illiberal democracies" where human rights are not well protected, where there is corruption together with a variety of social and economic challenges, have increased (Torfason and Ingram, 2010, pp. 5 and 62).

Diamond (2002) mentions four possible reasons for the fact that democracy has become, in his words, shallower:

a. deterioration of quality of governance and rule of law;
b. diffusion of liberal democracy shows regional variation: complete in Western Europe and Anglo-American countries (100 percent), almost complete in East Central Europe and the Baltics (about 75 percent), a touch less than 50 percent in Latin America and the Caribbean, less than 30 percent in the Asia-Pacific region, a little more than 5 percent in Sub-Saharan Africa, and none in countries that used to be part of the Soviet Union (the Baltic states excepted). The Arab world has no true

democracy, but we will have to wait and see what the outcome of the various uprisings will be;

c. several political regimes that appeared to move toward democratic rule settled once more for a type of authoritarian rule (e.g., especially in African and former Soviet Union countries); and

d. many of the democracies that were created after the fall of the Berlin Wall (1991) experience the same domestic (economic and political development) and international challenges (standing in the international community) as the newly independent states in Africa and Asia in the 1950s and '60s (Diamond, 2002, p. 4).

In light of Mill's insight, democratization is ultimately a bottom-up process. It is not possible to flip a switch in a population where the majority of people were subjects rather than citizens, or where people have only known totalitarianism and dictatorship, and tell individuals that "we have liberated you; as of today you live in a democracy." In other words, the institutional arrangements for democracy that we briefly describe later stand or fall with the restraint of the individual. We will first focus on types of democratic systems in general, and then (in the next subsection) concentrate on the distinction between parliamentary and presidential systems.

A democracy can be established with or without a constitution. Many countries have a founding and compact document, but it is not necessary. A series of constituting documents will serve the same purpose; namely, that of grounding a country's government and citizenship in a set of fundamental laws. Two well-known examples are the United Kingdom and Israel (Lane, 1996, p. 7). Whatever the grounding document or documents, it is assumed that people in a democracy have a sense of homogeneity, of belonging together. In truly and sociologically homogeneous societies people share a language, a history, and an ethnicity. Now that many Western countries have experienced rapid immigration and have become less homogeneous, it is and should be in citizenship that we find a renewed, albeit more abstract, sense of homogeneity. Perhaps developing countries are less challenged in this respect and thus are still to a larger degree societally homogeneous. That may actually bode well for hopes of democratization. Now, to be sure, democracy can emerge in both homogeneous and heterogeneous societies, but that depends in the eyes of Gabriel Almond (1968, pp. 55–66) upon political culture and the differentiation of the political system. In his view, a homogeneous political culture is one

where the citizenry agrees about the core political values and their priorities. He regards Anglo-American countries as the most stable because there are no serious cleavages in society and the political system is highly differentiated. While the political systems of Western Europe are as differentiated, they also have more fragmented political cultures. Cleavages can be based in religion (for instance, Catholics versus Protestants in the Netherlands and Germany; or religious versus secular Jews in Israel), ethnicity (for instance, African-Americans versus Caucasians), class (for instance, upper, middle, and lower classes in a society where social mobility is limited), and region (for instance, Flanders versus Wallonia in Belgium) (Lane and Ersson, 1989, ch. 2). Some countries have multiple cleavages (for instance, Belgium, Israel, Lebanon). As mentioned previously, we are inclined to think that Western countries have become less homogeneous as a consequence of immigration. This, though, does not have to be detrimental to democracy, and is not when political institutions are differentiated in a system of institutional arrangements that prohibits control of political power in the hands of one individual or body. The political system in Western countries is highly differentiated (see Section 3 later), while in preindustrial political systems—that is, before the late eighteenth century—and in totalitarian systems political power is concentrated in one person or institution.

It is natural that people associate with those with whom they feel affinity, with those with whom they have grown up. However, in societies that experience social cleavages as a consequence of immigration, it would behoove policy makers to advance policies that help people recognize and value what binds them together: citizenship. A sense of togetherness based in citizenship rather than other social ties is challenging and may even be under pressure as a function of growing income inequality in many Western and non-Western countries. Income inequality is increasing in many countries (*Economist*, 2012) with the United States leading the way. By way of example one can look at executive compensation in comparison to the wages of ordinary workers. In 1999, CEO compensation in the United States was 34 times that of employees; in the United Kingdom "only" 24 times; France, 15; Germany, 13; and Japan, 11 (Knoke, 2001, p. 264). Globalization, however, is reported to have influenced executive pay, in the sense that the difference between executive and employee pay has been steadily increasing.

It may seem that we have digressed from the theme of characterizing democratic systems, but one thing that practitioners and students of governments must be aware of is the extent to which democracy cannot

be taken for granted. Michels' "iron law of oligarchy" may concern the concentration of political power only, but could be regarded as a specific example of a more general human condition: the instinct to protect oneself by whatever means and then potentially invade the freedom of others. Growing income inequality points to lenience toward greed and concentration of economic power as well as wealth. This is potentially dangerous to any democracy.

How democracies can deal with the potential of instability has been explored by Seymour Martin Lipset and Arend Lijphart. Lipset suggested that a society is more stable when its value system rewards individual effort and performance. He contrasts such achievement societies to ascription societies where people get ahead on the basis of birth or rank. Obviously, he regards the United States as an excellent example. However, and in light of our brief excursion into income inequality, we suggest that social mobility is much less possible today in the United States than in the past (Portero, 2012). Lipset also agrees with Gabriel Almond that social homogeneity fosters stability (1963, 1979). Lijphart convincingly argued that stability can be found in homogeneous and fragmented societies alike, but that it then is a function of elite behavior. In a deeply divided society as the Netherlands during the first six decades of the twentieth century, it was the elites who created consensus in the pursuit of political objectives, while people were segregated along religious lines. He suggested that his country was moving in the 1960s from being pillarized to becoming more like a cartel democracy (that is, a harmony model) where there are no political subcultures (1968, p. 229). In view of what we wrote in Chapter 4 about immigrant societies, we may well again see political subcultures, especially among those who cling to a sense of Dutch nationality versus those who seek to accommodate cultural differences.

Many democracies will have competing elites, but these will not threaten political stability as long as the elites recognize the need for consensus and compromise. Obviously, this is easier to achieve in consensual than in majoritarian systems, especially when elites have lost the art of consensus as appears to be increasingly the case in the United States.

Presidential and Parliamentary Systems

We can now extend our discussion previously about the executive capacity of political systems on the one hand and types of democracies on the other, to contrasting parliamentary and presidential systems, which are by far the two dominant arrangements in democracies. In a *parliamentary*

democracy the functions of head of state and head of government are separated. The head of state is often a ceremonial function where monarch or elected president represents the country abroad. The real power rests with a prime minister who can either be elected directly by the people (Germany) or picked by the political party that has won the elections by number of seats (as in the Netherlands and in Israel). It is also the prime minister who forms a cabinet of ministers. In Westminster systems this is a cabinet based upon a majority in parliament (see Patapan and others, 2005); in consensus systems this is a cabinet where a coalition of political parties are represented since none can acquire an absolute majority in the legislature. By contrast, a *presidential democracy* is one where one elected official serves both as head of state as well as head of government. The United States is an example of a country with an extraordinarily powerful executive since the presidency not only combines head of state and head of government but also includes that of commander in chief (this is also the case in several Latin American countries). Lane and Ersson characterized France as a Westminster system, but that is because it is basically a two-party system where one party has a slim majority and holds the presidency as well as the prime ministership (1994, p. 72). France may actually be somewhat of a hybrid, a *presidential-parliamentary democracy,* since there is a directly elected president who then appoints a prime minister responsible for securing majority support in the legislature. The president also appoints the cabinet. The French Fifth Republic has also been called a semipresidential system since the cabinet can be forced to resign when a vote of no-confidence has passed the legislature. Another surprise could be Germany. It has an elected president, but it is a parliamentary system where the real political power is invested in the chancellor. An oddity in the contemporary world system is the fact that the British monarch is the head of state in 16 of the 54 states (most of which are former colonies) in the Commonwealth of Nations (nota bene: Elizabeth II is head of the Commonwealth). It is unclear how permanent this situation is, but the current (2013) prime minister of Jamaica, Ms. Portia Simpson Miller, has indicated a desire to find an indigenous head of state.

When counting the number of parliamentary and presidential systems listed in Wikipedia, the former seem to be a little more dominant, and this is visible in Table 5.4, even though it only contains 80 countries. It appears that in Asia and Western Europe a clear preference exists for a parliamentary system, while a presidential system is preferred in the Americas and Africa.

TABLE 5.4. PARLIAMENTARY, PRESIDENTIAL, AND HYBRID DEMOCRACIES

	Parliamentary	Presidential	Hybrid
Africa	Botswana, Senegal, South Africa	Gambia, Ghana, Malawi, Namibia, Uganda, Zambia, Zimbabwe	
Americas	Canada, Jamaica	Brazil, Chile, Colombia, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Paraguay, United States, Uruguay	Argentina, Bolivia, Peru, Venezuela
Asia Pacific	Australia, Fiji, Israel, India, Japan, Jordan, Malaysia, Nepal, New Zealand, Papua New Guinea, Singapore, Thailand, Turkey	Bangladesh, Pakistan, Philippines, South Korea	Sri Lanka, Taiwan
Post-Communist	Bulgaria, Czech Republic, Estonia, Hungary, Latvia, Slovak Republic	Belarus	Lithuania, Poland, Romania, Russia, Ukraine
Western Europe	Austria, Belgium, Denmark, Germany, Greece, Iceland, Ireland, Italy, Luxembourg, the Netherlands, Norway, Spain, Sweden, United Kingdom		Portugal, Finland, France, Switzerland

Source: adapted from Carey, 2005, 93.

Party-Political and Bureaucratic-Prominent Systems

So far we have characterized political systems in fairly straightforward ways as unitary or federal, as majoritarian or consensual, as democracy or totalitarian, and as parliamentary or presidential. These dichotomous representations help as a first approximation of the nature of a political system but hide a much more complex reality that was ably categorized by Ferrell Heady in his distinction between party-prominent and bureaucratic-prominent political

regimes. The following is based on Chapters 8 and 9 of his major study (2001) and we find that his subtypes of each greatly clarify why it is important that the study of public administration pays attention to the political context in which governments operate.

We will begin with the *party-prominent systems*. Heady distinguished between four of these. The first is the *polyarchal competitive system*. Essential to this model is political competition, and political change occurs without disrupting the system. This is characteristic for all those democratic systems discussed in the previous section and is found predominantly in Western Europe and the Anglo-American countries but would also include the Philippines and Sri Lanka. Polyarchic or democratic systems operate on either a parliamentary or presidential model, and most newly independent states in Africa simply adopted one of these two models from the former colonial ruler (Heady, 2001, p. 372). The second type is the *dominant-party semicompetitive system,* where one party has held a monopoly of power for a substantial period of time. However, other parties do exist and are legal. The dominant party is nondictatorial, and examples include India, Malaysia, and Mexico (Heady, 2001, p. 383). The *dominant-party mobilization system* is the third type, and in these there is less permissiveness in politics, actual or potential coercion is larger, and the dominant party is usually the only legal party. Examples include Egypt and Tanzania (Heady, 2001, p. 393). These first three types are quite common in developing countries (Heady, 2001, p. 371). Some African countries after independence experimented with communism, but it was not a great success. Finally, there are the communist totalitarian systems that have only one legal party, and a so-called parallel bureaucracy. This is the situation where the bureaucratic organization at each level of government is controlled and steered by its parallel level in the political hierarchy. This is also referred to as the Double Hierarchy Model (Mayntz, 1978, p. 77). Examples of these include China, Cuba, Laos, North Korea, the former Soviet Union, and Vietnam (Heady, 2001, p. 403).

The second major category Heady distinguished is that of *bureaucratic-prominent systems* where professional bureaucrats hold power directly or are indispensable to nonbureaucratic elites. Key policy-making positions are occupied by career government officials. A competitive party system never existed, is in jeopardy, or is superseded by bureaucracy (Heady, 2001, p. 313). This is the ultimate administrative state, one without political officeholders or where political officeholders and career civil servants have become blended (this is the pure hybrid of Image IV in Aberbach and others, 1981, pp. 4–16). In this type of system public officeholders are,

as Hegel called it, the new guardians of democracy (for discussion of this see Raadschelders and others, 2015b, p. 367). As far as we know the true administrative state—that is, one without political officeholders—has never existed. The closest is nineteenth-century Norway where career civil servants governed but acknowledged the Swedish king as their head of state.

Heady identified six different types of bureaucratic-prominent systems. In *traditional elite systems* members of the political elites owe their position to the old social system. These are decreasing in number, and presently they are mainly found in the Near East and North Africa (mainly in Islamic countries) (Heady, 2001, p. 314). Heady distinguished two subtypes. The *ortho-traditional system* is largely traditional and aristocratic. The bureaucracy is relatively small and highly centralized. Its politics is geared toward system preservation. Examples include Iran before 1979 and Saudi Arabia (Heady, 2001, p. 315). At the beginning of the next chapter we shall see that this system is historically the most dominant. The second subtype is the *neo-traditional system* where traditional regimes change, but no effort is made to become a truly parliamentary or presidential system. This type of country has never been colonized, and bureaucracy survived and prevailed as a well-entrenched institution of power. This is a rare type of policy since the only example that comes to mind is that of Iran (Heady, 2001, pp. 316–321).

The second main type is the *personalist bureaucratic elite system* characteristic of the *caudillo* or strongman regimes in Latin America that were dominated by (mostly) military leadership (Heady, 2001, p. 321). We write in the past tense because, despite its "popularity" in the twentieth century, there are very few, if any, of these regimes left in Latin America. There have been some in Africa as well (for instance, Idi Amin in Uganda in the 1970s) (Heady, 2001, pp. 321–327). The caudillo regime is hierarchical by nature and thus differs from a *junta,* which is a *collegial bureaucratic elite system*—the third type—that used to be characteristic of many Central American countries, and of Greece between 1967 and 1974, Portugal 1974–1976, and Pakistan between 1977–1988 and 1999–2008. A *junta* is a collegial body of professional administrators, usually military officers, who exercise political leadership. They have often done so as an intermediate solution following a military strongman and preparing for civilian-military coalition bureaucratic regime (Heady, 2001, pp. 327–330). This type of regime has declined since the late 1990s and, as far as we know, the only two left are Fiji and North Korea.

The *law-and-order regime,* fourth, is a collegial military regime that is focused on the maintenance of political stability, and Indonesia is a good example of this type, at least until the late twentieth century. Since then

Indonesia has been moving toward becoming a democratic system (Heady, 2001, pp. 330–335). The fifth type is where a change occurs from being a *traditional elite* to a *collegial bureaucratic elite regime* without an intervening colonial period. This is characteristic for what happened in Afghanistan (1973), Ethiopia (1974), and Thailand (1997) (Heady, 2001, pp. 335–341). There are, however, also examples of countries with this type of regime that had a colonial background and where continuity after independence was found in the administrative rather than in the political system (for instance, Ghana) (Heady, 2001, p. 341–346). Finally, sixth, there are the so-called *pendulum systems* of which the most significant feature of the political environment is that it swings between being a bureaucratic elite and polyarchal competitive regime. Examples include Brazil, Nigeria, and Turkey (Heady, 2001, pp. 346–358).

The Three Branches of Government and Core Features of Democratic Political Systems

So far we have written in this chapter about the major features of the political superstructure, and we will conclude in this section by briefly mentioning that the most common division of labor at the apex of the political-administrative system is that between legislature, executive, and judiciary (in that order), each of which is supported by bureaucracy. In this section we will briefly summarize the origins and features of this *trias politica* and will, next, in a little more detail discuss the main political features of how democratic systems function. The fact that political systems cannot function without bureaucracy, which has been called the fourth branch of power, warrants that we also consider the main features of bureaucracy (next section).

The various types of political systems described in Sections 2 and 3 earlier are descriptive of what can be found in the world today. The earliest categorization of political systems, however, dates back to Plato and Aristotle who suggested three types of systems, each with a preferred and a degenerate subtype (Table 5.5). To them, democracy was tantamount to rule by the masses or the mob. They would probably be surprised to find that, more than 2,000 years later, democracy is considered to be the most desirable type of rule and that it has, indeed, become the dominant one.

Democracy as we know it started to emerge in the United States and some Western European countries from the late eighteenth century on and diffused across the globe in the twentieth century. What Heady called "classic systems" of government and administration are those where

TABLE 5.5. SIX TYPES OF POLITICAL SYSTEMS ACCORDING TO ARISTOTLE

	Preferred	Degenerate
One-person rule	Monarchy	Tyranny
Rule by a few	Aristocracy	Oligarchy
Rule by the many	Polis	Democracy

democracy became the foundation upon which government–society relations were built (Heady, 2001, pp. 190–191), and examples include England, France, Germany, and the United States. In these classic systems a distinction between legislature, executive, and judiciary was enshrined in the Constitution or in comparable constitutional documents. This *trias politica* of political powers was first envisioned by Montesquieu, who built upon similar ideas of John Locke (Locke distinguished between legislature, executive, federative; the latter being concerned with foreign affairs). In this type of system, thought and intention (legislature), planning and action (executive), and evaluation of lawfulness (judiciary) rest in separate branches of one and the same state. Implicit in this three-way division of labor is that each of the branches has authority to check upon the other two. We need not discuss the varying degrees of such a check-and-balances system, but only need to be aware that in some countries it works out as overtly adversarial (and intentionally so) while in others it is more subtly embedded in the political system. Thus, in the United States, each of the three branches of political power holds constitutionally defined checks upon the other two. This is obvious for its legislature and executive, but perhaps less so for its judiciary. However, keep in mind that the justices of the U.S. Supreme Court have the authority of judicial review thus amending, correcting, or vetoing legislative action, and that judges in general can pass judgment on issues not addressed or even consciously left aside by the legislature. The power of judicial review also exists in Canada, the Czech Republic, Denmark, Germany, Hong Kong, Ireland, Japan, Malaysia, New Zealand, the Philippines, Sweden, Switzerland, and Taiwan. This befits a political-administrative system with a common-law origin, which is a system where *justice precedes law*, that is, a system where jurisprudence is regarded as law. In many countries the highest court does not have such discretion; they are political systems with a Roman and/or statute law origin where *law*

precedes justice; that is, where the legislature acts and sets the adjudicatory standards. Hence, in many countries it is the legislature that sets the boundaries (for instance, what is a civil and what is a criminal offense and what are the—usually—graduated sanctions?) within which the judiciary can adjudicate. To be sure, in practice statute law has come to dominate most states and their governments, irrespective of their common or Roman law origin. The United States is an excellent example of this development (Hurst, 1977). In many Western European countries and their colonies, statute law dominated much earlier.

At this point we emphasize, again, the importance of understanding the interplay between structure and functioning of governments. The structure of government is either categorized in terms of dichotomies or by means of typologies (see Sections 1 and 2 earlier). It is equally important, though, to know what actually makes them "tick," and we shall rely once more on Heady (the following based on Heady, 2001, pp. 190–191). He listed five crucial elements of "classic" administrative systems. First, they have a highly differentiated system of government organization. The allocation of political roles is based on achievement rather than ascription, and they have a highly specialized bureaucracy. Second, these systems have procedures for making largely rational and secular political decisions. The power position of elites has eroded, and they operate upon an impersonal system of law. Third, there is ample evidence of extensive political and administrative activity in all major spheres of life. Fourth, political power is widely regarded as legitimate because the population at large identifies itself as belonging to and being part of the state. Thus, fifth, there is evidence of widespread popular involvement in the business of government.

None of these five elements or characteristics of functioning democracies would be possible without an alert, responsive, and responsible bureaucracy, and it is to their structure that we now turn. Again, we stress, that while the dominant focus in this chapter has been on political systems, since the early twentieth century no one can with reason omit the administrative system. This is why the first part of this chapter's title is "Political-Administrative Systems . . ."

The Structure of Government Departments

In the contemporary world no political system and its main branches can function adequately without bureaucracy (Vigoda-Gadot, 2009). In fact, this is the ongoing and puzzling paradox of democracy (as we know it) and

bureaucracy (as we wish to have it). It is only since the late nineteenth/early twentieth century that bureaucracy is not simply a buttressing support to the political system, but has actually become vital to the survival of the political system. Heady (2001, pp. 190–191) distinguishes five features of bureaucracy in "classic systems." First, bureaucracies are large-scale public services that develop and implement policies. Second, bureaucracies are highly specialized. That is, all governments have departments for clearly demarcated functions: defense, foreign affairs, treasury, home affairs, justice, and so on and so forth. Given the range and scope of government functions today, third, bureaucracies are also strongly professionalized. They employ people with widely diverging backgrounds, simply because they write law and pursue policy in a wide range of areas. They further seek people with high public-sector motivation (Perry and Wise, 1990) and those who are highly committed for public service, preferably for a long career. Governments initially employed people at the middle- and higher-level ranks when they had a law degree, but those days are long gone. We suspect that any degree that one can acquire at an institution of higher education is useful to some government function. Governments no longer only hire lawyers, but also theologians, musicians, philosophers, political scientists, sociologists, historians, physicists, chemists, geographers, engineers, agriculturalists, linguists, medical doctors, nurses, and so on and so forth. Fourth, bureaucratic officials (or, as we prefer to call them, career civil servants) play a fairly clear role in the political process. We will expand on that in Chapter 8, but here it suffices to say that the expert and experiential knowledge of civil servants has become indispensable to political officeholders. As a consequence, the difference between politics and administration has become blurred, to say the least. Finally, and fifth, bureaucracy in a classic democratic system is subject to effective policy control by political institutions and the elected officeholders who inhabit them. Sure, we know that career civil servants have exercised all sorts of tactics to trump political objectives deemed as untimely, costly, or "not done." But we should also keep in mind that Max Weber's worry about democracy being overshadowed by bureaucracy has not come to pass. If anything, career civil servants in mature democracies have shown that they are able to set aside their personal interests for the common good. One cannot say the same of political officeholders!

If the previous statement holds truth, we should wonder why. Are career civil servants better at serving the common good than their elected supervisors? In general, this question cannot be answered, but there is at least one explanation for why the answer to this question may be affirmative.

The answer lies in the fragmented nature of government bureaucracy itself. People tend to think of government as a monolith, a huge organization that, to a lesser or larger degree, oppresses the "natural" freedoms people have become accustomed to, and even believe themselves to be endowed with, but which only are part and parcel of humankind's understanding of politics since the late eighteenth century. It is no coincidence that "bureaucracy" as a concept came to be *recognized* (in the middle of the eighteenth century; see Albrow, 1970; Raadschelders, 2003, pp. 316–317) shortly before democracy came to be perceived as the desired political system. Bureaucracy was *defined* as a type of organizational system *after* the establishment of democracy (and we should add: in Western Europe; see next chapter). Bureaucracy in today's political-administrative systems is anything but a monolith.

Administrators and citizens alike know that "government" can be identified as the political party or political coalition in power but also as the set of bureaucratic departments that shore up the three branches of government. Generally speaking, people as citizens do not think of government bureaucracy as highly fragmented. And, it is in part because of that fragmentation of government bureaucracy that it has not superseded democracy. As it is, in most, and perhaps all, countries, government bureaucracies are compartmentalized in a variety of departments. Some appear to be generic, such as a Department of Defense, a Department of Justice, a Department of the Treasury, and a Department of Home Affairs. Nowadays, there are several other departments, often split off from the Department of Home Affairs, such as a Department of Education and a Department of Labor and Economics. Sometimes, government departments are established in response to a specific geographic condition, such as a Department of Water Management, or in response to an acknowledged and emerging need, such as a Department of the Environment. However, no matter what the origin and rationale of government departments, each country has several, if not many. We can look at these as if each one is part of that monolith, but that does not do justice to the extent to which governments have become specialized in response to various needs. Specialization in government structure is expressed through organizational differentiation; that is, through the various units that make up each department. While the three main branches of democratic governments usually operate as three collegial bodies, it is bureaucracy that is segmented according to task and function.

This segmentation of bureaucracy and its various subdivisions (i.e., departments and units within departments) is worldwide and cannot be

better illustrated than by looking inside the organizational structure of a government's bureaucracy. Raadschelders (2011, pp. 83–92) showed how government bureaucracy breaks down into multiple units at each level of government in the United States. At the federal level, there are 15 government departments. For one of these, the Department of Health and Human Services (DHHS), he showed how it "broke down" into multiple subunits. He then showed how one of the subunits of DHHS, the Administration of Children and Families, is subdivided into multiple subunits itself. One of these subunits at the federal level, the Administration on Children, Youth, and Families, proved to be further fragmented into more subunits, while another of these federal subunits, the Region VI of DHHS, is also broken down into several subunits. The same pattern of organizational differentiation can be found at state and local levels in the United States. We expect that this pattern of organizational differentiation (i.e., of government bureaucracy consisting of thousands upon thousands of subunits) is found in most, perhaps even all, government organizations. By way of illustration, let us consider the state of Israel (see Figures 5.1, 5.2, and 5.3). As of 2012 this country had 24 government departments. We'll take the Department of Social Affairs and Social Services as an example (see later).

Previously we mentioned that the fragmentation of government bureaucracy is one of the explanations that help us understand why it has not superseded democracy. The answer now seems simple: Government bureaucracy is organizationally fragmented, and its career civil servants advance that part of a citizenry's interest that they are hired to protect. There is, we think, another reason, and that is that career civil servants have become, by and large (there are always exceptions), the new guardians of democracy to an extent that even Hegel could not have dreamed of. That, however, merits further consideration in Chapter 8. Meanwhile, there is one aspect of the political (-administrative) system that requires attention in the context of this chapter, and that is the fashionable notion of multilevel and multiactor government and governance.

Multilevel and Multiactor Government and Governance

In the previous section we showed how government bureaucracy is a multitiered or multilevel system with many different actors in each of them. That is, internally, government bureaucracies are multilevel systems. However, the concept of multilevel government (often abbreviated in the literature as MLG) and governance, with its many institutional and

FIGURE 5.1. THE STRUCTURE OF THE GOVERNMENT OF ISRAEL AND THE PRIME MINISTER OFFICE
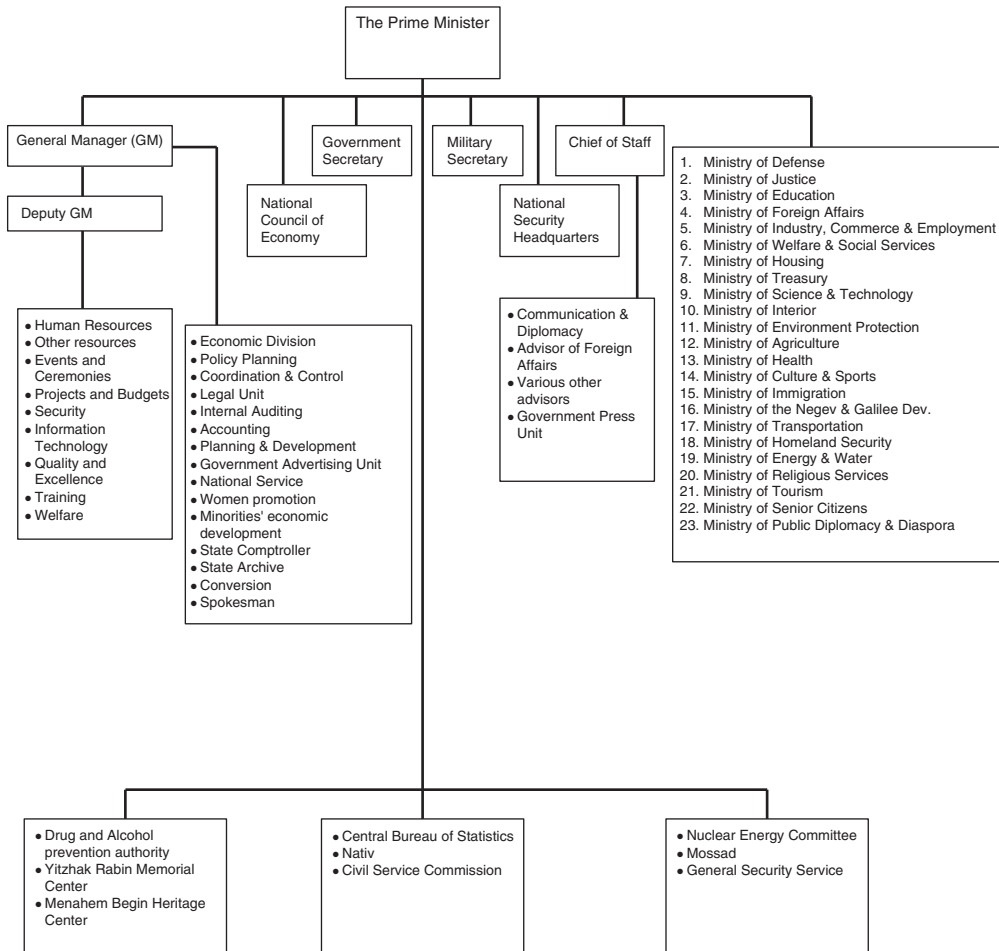
FIGURE 5.2. THE ISRAELI MINISTRY OF WELFARE AND SOCIAL SERVICES

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                        Minister of
                        Welfare and Social
                        Services

Prisoner Support      Rehabilitations                    Social Security
Authority             Authority                          Institute

                        General Manager
                        (GM)

         Deputy GM                            Senior Deputy GM
                                              for Administration
                                              and HRM
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National program for Children in risk	Division for Rehabilitation Services	Unit for special assignments	Personal and Social Division	Detached Youth Division	Retarded Treatment Division	Legal advisory	Human Resource
	Authority for Community Treatment	Individual support	Individual and family welfare	Youth examination	Community service	Accounting	Security
Districts: 1. North, 2. Tel Aviv & Center 3. Jerusalem 4. South	Extra-residential treatment	Volunteers	Child and youth services	Adult examination	Extra-residential housing service	Budgeting	Assets and Logistics
	Support to the Blind	International relations	Service to the elderly	Autism services	Diagnostics and support	Research & Planning	Training
	Employment support	Public Institutions	Adoption services	Youth rehabilitation	Health services	Information systems	Administrative system analysis
		Citizens' service	Community work	Adolescent treatment		Chief Engineer	Administration of institutions
			Connection to municipal services	Treatment for addiction		Internal auditing	Welfare
				Youth protection		Spokesman and citizens' complaints	Discipline
						Inheritance	

Source: http://www.molsa.gov.il

FIGURE 5.3. THE STRUCTURE OF THE NORTH DISTRICT OF WELFARE AND SOCIAL SERVICES
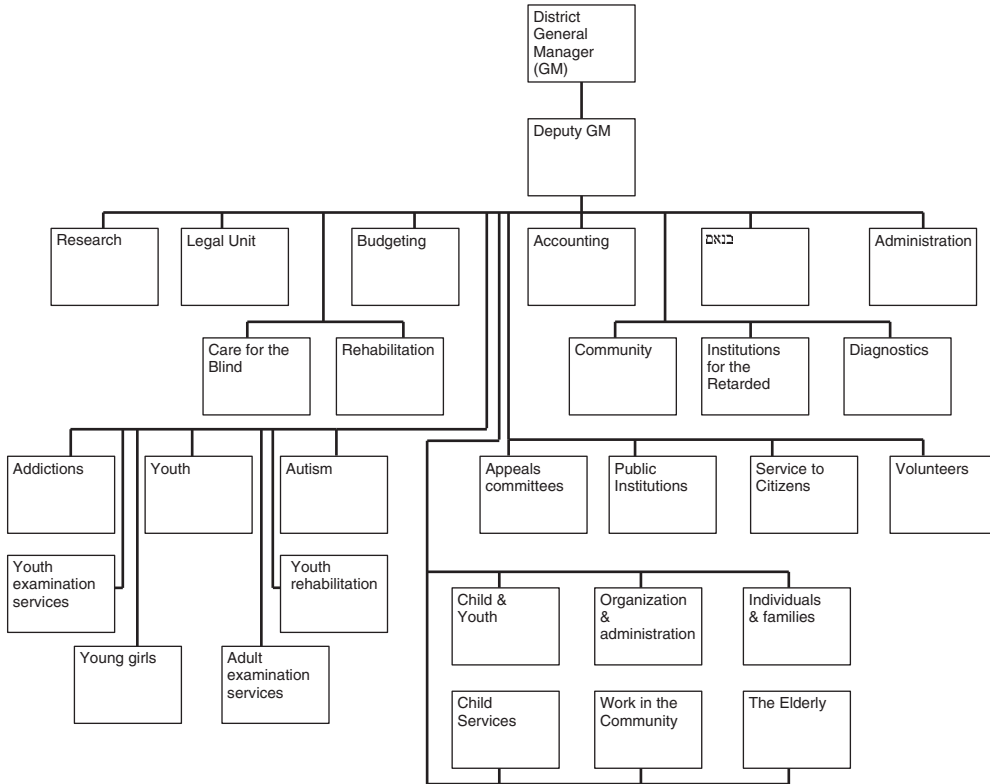
individual actors, emerged in the early 1990s (Marks, 1993), but is actually a phenomenon that has existed ever since governments established territorial levels (see Chapter 3). This happened historically because governments recognized this pattern as "an efficient response to the cost of communicating with a large number of people simultaneously. By sending a message to a limited number of persons, who each send the message on to a similar limited number of persons, and so on, a single person (or government) can communicate with a vast number of individuals in a few steps." (Hooghe and Marks, 2009, pp. 228–229) There is, however, another important and more contemporary reason that multilevel governance has become a

popular concept, and that is that it captures well the polycentricity of governance. While government is the only actor that has the authority to make decisions on behalf of the entire citizenry, it is not the only actor contributing to the governance of society. In other words, both the concepts of multilevel governance and multiactor government specifically acknowledge that policies are made and implemented in vast networks that include public-, nonprofit-, and private-sector actors (Van den Berg, 2011, p. 17; see for overview of the MLG literature, Enderlein and others, 2010). Multilevel government is a term that refers to central-local relations (in Europe) or intergovernmental relations (in the United States) and to relations between governments as sovereign actors and the multinational organizations to which they have declared membership. Indeed the concept emerged in the effort to describe the relations between the European Union and its member states.

Liesbeth Hooghe and Gary Marks distinguish between two types of multilevel governance (2009, p. 234; see also Hooghe and Marks, 2003, pp. 236–239). Type I are general-purpose jurisdictions that combine problems with similar scale in one jurisdiction, are territorially nonintersecting, have a limited number of jurisdictions, and a fairly limited number of levels. Type II are task-specific jurisdictions that deal with separate nearly decomposable problems in discrete jurisdictions, are territorially intersecting, and can have unlimited numbers of jurisdictions. Examples include Chesapeake Bay Council, Dutch water boards, NATO, U.S. school districts, and the World Health Organization. Their types I and II of multilevel governance correspond to the distinction between general-purpose and specific-purpose governments, which we discussed in Chapter 3. Hooghe and Marks emphasize that in type I, citizens cannot but be members of the jurisdiction (the intrinsic community), while in type II membership is voluntary (the extrinsic community). Type I is characteristic for the unitary state, regions, metropolitan areas, empires, and international platform organizations (for instance, African Union, Catalonia, China, European Union, Flemish Community, Inca Empire, London, United States), while type II is more in line with federalism (see also Eaton, 2008). Related to federalism, there is a third reason that this concept is important: A federal structure of government is better at accommodating multination countries (see Bertrand and Laliberte, 2010). Excellent examples of this would include Belgium and Bosnia-Herzegovina. Finally, multilevel government is an apt concept in a world where administrative and fiscal decentralization have increased in the past 50 years or so (see Bird and Vaillancourt, 2008; Falleti, 2010).

However, how fitting the concept actually is has been contested. One criticism is that the concept is hierarchical, for it emphasizes levels of government. In that light it can be debated whether international bodies constitute a level of authority. More specifically, one author noted that the MLG concept and its two types reflect two very different entities. Type I truly represents multilevel gover*nment* that is hierarchical by nature. Type II, however, emphasizes gover*nance* and is much more concerned with network (Faludi, 2012). A second criticism is that it is a more descriptive than an explanatory concept (Bache, 2008, p. 27). Finally, it is a concept that fits a neopluralist theory of the state that includes multiple competing interest groups; it is less fitting to describe the situations in authoritarian, clientelist, weak, and failed states (Stubbs, 2005, p. 73).

Concluding Remarks

In this chapter we described the overall political-administrative superstructure of governments across the globe. As Hooghe and Marks noted, "the evidence [. . .] reveals a surprising degree of universality in the territorial structure of government." (2009, p. 238) However, the elements of this set of institutional arrangements are not static, for they are subject to change. The most dramatic changes in the past century have been those where populations demanded an end to totalitarian government and where their protests ushered in a more democratic system. This development is still ongoing (think of the Arab Spring). Democracy is a living and organic feature of modern societies that can only thrive when people show self-restraint and can act in the interests of the whole. However, in today's sedentary and densely populated polities, democracy cannot "live" without bureaucracy. And bureaucracy, too, is a living, organic element of the political-administrative system, always subject to change. Bureaucracy is a global phenomenon, but its features are specific to the societal culture in which it is embedded. The contents of Chapters 2 to 5 provide the foundation upon which we can probe more deeply into bureaucratic organization, culture, and functioning, and for that we turn to the next chapter.

CHAPTER SIX

BUREAUCRATIC ORGANIZATION AND CULTURE

In July 1917 the French pianist Erik Satie wrote *Sonatine bureaucratique,* a four-minute piece that parodies Sonatina in C Major op. 36, no. 1 by Muzio Clementi (1752–1832). Just listening to the music, it is clear that it is about busyness without substance. Satie supplied his own narrative alongside the music, describing a bureaucrat going to work, loving his office, but doing little. He wrote this possibly in part with an eye on conservatism in art, targeting and mocking those who would not embrace fresh ideas; and he certainly wrote it as an accusation of traditional formal procedures (in music as well as anywhere) (Hare, 2005, pp. 63, 82, and 87). Satie's *Sonatine* is just one example of how bureaucracy is stereotyped in the arts. Two other examples are Franz Kafka's novels *The Trial* and *The Castle.* The arts reflect the stereotypical understanding of bureaucracy among people at large. A sample of these stereotypes include that bureaucracy is too big and suffering from "elephant disease," (Eisermann, 1976, p. 50), that bureaucrats multiply like rabbits (Zehm, 1976, p. 52), that they are more concerned with the offices they hold—cf. Satie—than with its duties (DuBasky, 1990, p. 337), that they are mediocre and merely shuffle papers (Von Mohl in Kaltenbrunner, 1976, p. 7), that they are "drunk with power," (remark by U.S. Senator Ashurst, as quoted in Rosenbloom, 2003, p. 169), that they are officious, and that they are impersonal and dehumanized. With regard to this last characterization, they once were even described as having

substituted "technical performance in sexual intercourse" for lovemaking (Hummel, 1977, p. 51; *nota bene,* Hummel told one of the authors of this volume once how, following criticism, he removed that particular quote from subsequent editions of his book).

Stereotyping, of course, is a shortcut to understanding and circumvents real thinking about the nature of something. To our knowledge, no composer, novelist, or any artist for that matter, has ever attempted to capture the *real nature* of bureaucracy. Scholars can define and have described bureaucracy in terms of its structural features (Section 1), and we have already seen how bureaucracy has become the predominant organizational model across the globe (Chapter 3). It has been around since prehistory, but until the late eighteenth/mid-nineteenth century its role and position in society was very different from what it is today (Section 2). As it is, the bureaucratic stereotype has much more to do with that lingering, historical legacy than with the actual performance of bureaucracies today.

While bureaucracy as organizational structure can be found everywhere, how it functions varies with the societal culture in which it is embedded. Understanding that starts with the societal level of culture (Section 3), where it becomes clear that there are significant differences between and even within cultures. These differences have impact upon organizational culture (Section 4); that is, how people perceive the organization. This, in turn, influences the individual level of culture (Section 5). In each of these sections we shall briefly describe the stereotypical and the actual conception of bureaucracy. In the final section we will revisit the role and position of bureaucracy in contemporary societies: Can we live with it, can we live without it?

Defining Bureaucracy: The Influence of Max Weber and His Fears

To understand the role and position of bureaucracy in contemporary society, it is necessary to compare it from three perspectives: two contemporary and one historical. The most familiar contemporary perspective is the stereotypical view many people have of bureaucrats (we prefer the term civil servants), and we have already had a taste of that in the introduction to this chapter. The second contemporary perspective is a formal definition of bureaucracy as developed by Max Weber in the early twentieth century. The historical perspective, how and why it came about, will actually help to

explain why the stereotype of bureaucracy emerged and why it is especially identified with government.

Weber may be partially blamed (if that's the right word) for that, for he regarded bureaucracy as part of the state that surrounded us like an "iron cage." (Baehr, 2001). To him and many of his contemporaries the seemingly sudden proliferation of bureaucratic organization in the context of rapid industrialization was baffling, even threatening, to the individual as well as to society at large. Individually, people felt alienated from the natural world they had known for millennia, and tried hard to salvage some sense of normalcy. It may appear strange in the mind-set of those living in the twenty-first century, but naturism was one of the ways—at least in Germany—that people felt they might reconnect with nature. Nude hiking and sunbathing were popular for a while (Hau, 2003). Since 1906, Weber used to sit at noon on his balcony for an hour, smoking his pipe, in Adam's costume (Radkau, 2009, p. 377). In society, Weber felt, the advent of bureaucracy was particularly and potentially harmful to democracy, sighing that the future was to bureaucracy and wondering whether democracy would not be overshadowed completely just as easily as human values and feelings could be overpowered by it.

Perhaps the following sounds naïve or displays an ignorant optimism, but would Weber change his verdict had he had a chance to talk with, for instance, Patrick Dunleavy? The latter showed that bureaucracy has been very able to restrain itself, and able to pursue reforms and budget and personnel cuts of its own accord (1991). There is more, however, that might persuade Weber to nuance his assessments. Today, bureaucracy is all around us. Any organization, public, nonprofit, and private alike, of a certain size is structured and operates as a bureaucracy. Governments all over the world are organized as multiple bureaucracies. However, any multinational, any sizeable business is a bureaucracy. Obviously, many, if not all, businesses start small. With Paul Allen and Bill Gates in jeans, Microsoft started small (although with ample funding sources from Gates's parents), but became a giant, and it is a bureaucracy. Any oil company that made it big after the first gusher could not avoid structuring itself as a bureaucracy. Big nonprofits such as Greenpeace, Habitat for Humanity, and the Red Cross would not be able to do their good works were it not for being organized as a bureaucracy. Hence, bureaucracy is not only an "iron cage" or prison, it is also "an essential scaffolding of thought" (Crowther-Heyck, 2005, p. 117), a prerequisite structure wherein an entire body of thought can develop, and that even can be a playground where the various climbing, swinging, and teetering toys and so forth will structure play but do

not determine how the play is conducted or pursued (Klagge, 1997). Obviously, bureaucracy can be an iron cage or prison, especially for those who overstep the boundaries of what is considered acceptable behavior. That it is also a scaffold or prerequisite structure for thought is perhaps best exemplified in a body of law. And it certainly is a playground, for it provides its occupants with the means to do what an individual cannot do. It enables behavior and action that transcends individual capabilities.

The metaphor of the "iron cage" confirms the stereotypical perception of bureaucracy; the metaphor of the playground is more benign, suggesting even that it is not dehumanizing. We will come back to this latter point, but shall now look at Weber's definition. In his view bureaucracy can be regarded as an organizational structure and as a personnel system (Chapter 8). The eight dimensions of bureaucracy as an organizational structure are easy to recognize.

Eight Dimensions of Bureaucracy as Organization[1]
1. continuous administrative activity,
2. formal rules and procedures,
3. clear and specialized offices,
4. hierarchical organization of offices,
5. use of written documents,
6. adequate supply of means (desk, paper, office, and so on),
7. nonownership of office (separation of office from officeholder),
8. procedures of rational discipline and control.

In incompetent or even wrong hands, it is easy to see how each of these dimensions can degenerate into an overbearing presence of the state, as is the case in totalitarian systems and which is so beautifully captured in the image of the always-turned-on TV screen in people's living rooms in Orwell's *1984* (dimension 1); into laziness, officiousness, and formalism (dimensions 2 and 8); into "turf fights" about the authority invested in an office (dimension 3); into rigid adherence to lines of command (dimension 4); into red tape, especially when documents appear to be full of "legalese" (dimension 5); and into theft of public property (dimension 6). In those cases bureaucracy (as the "good" type of organization) slides into bureaumania or bureaucratism (compare to the three types of political systems in Chapter 5). The one dimension that seems more difficult to be manipulated by the human condition (that is, by the sins of envy, gluttony,

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[1] Van Braam, 1986; Raadschelders and Rutgers, 1996, 92.

greed, lust, pride, sloth, and wrath) is dimension 7. However, while people may no longer be able to sell or inherit their public office as they could and did in the past, they may well succumb to envying someone else's position or take pride in the office they hold. In any of these cases, the public interest has been superseded by individual desire. It is important to note that Weber never said that bureaucracy was efficient, only that it was more efficient than other known types of organization. What is implicit in his writing, as Gyorgy Gajduschek pointed out, is that bureaucracy caters to "uncertainty reduction" because it enables political officeholders, civil servants, researchers, and citizens to reconstruct past outputs and procedures from written records and it helps them to plan for the future (policy making and implementation) through its predictability and calculability (Gajduschek, 2006, p. 716).

Earlier we suggested that bureaucracy is subject to manipulation and abuse. The first to suggest that bureaucracy's rationality and efficiency can potentially turn into irrationality and inefficiency was Robert Merton in his landmark 1940 essay "Bureaucratic Structure and Personality" (1952). What if the impersonal application of rules is exaggerated to the point that they become a goal in themselves, serving the procedures of the organization rather than the needs of citizens? What if bureaucracies measure their own performance in various ways and stop sharing best practices for fear of losing their ranking? What should come first, organizational performance or a citizen in need? The popularity of performance measurement in the United States has been spreading to other countries, and it seems that Merton had a point when saying that people in bureaucracies may focus more on proper application of rules and on measuring their own performance than on the objectives for which it exists today: to help citizens. In the extreme, bureaucracy has been used as an instrument of evil (Adams and Balfour, 2004; Adams and others, 2006) and not only in the recent past. It will be used so again, but that is because of the human condition. (With a nod to the ongoing American debate about gun control, this may sound similar to the argument that guns do not kill people, but that people kill people. However, this reasoning by analogy does not work because bureaucracy cannot be bought and sold by individuals. Furthermore, nowadays people do not need guns in their homes. It made sense to have weapons when living in sparsely populated areas where help in dire circumstances might not be readily available. In the densely populated, highly urbanized communities of the modern world guns should be in the hands of law enforcement officials only.)

There is a third reason why in democratic societies, bureaucratic organization does not fall prey easily to the human condition. When asked:

"What do you think about government?" people often resort to the stereotype of it being too big, too little transparent, too costly, too incompetent, and so forth. When asked, however, what they think of specific government services they have had experience with, the assessment is very different, even more so when asked about the quality of service from a specific public servant (for instance, school teacher, police officer, judge, social worker). The empirical evidence since the 1960s is consistent about the extent to which citizens are content and satisfied with the performance of individual bureaucracies and their civil servants (for instance, police precinct, elementary school, fire department) (Goodsell, 2004). The two authors of this volume know quite a few career civil servants, just as any reader will. And, yes, they have known some who were "not up to snuff" and should never have been appointed to public office. Again, any reader will be able to come up with some examples of her/his own. Everyone knows that "a few rotten apples will spoil the barrel." If there is truth to this proverb, we can assume that the large majority of career civil servants are decent people who try to do the best they can with the limited resources given to them. Unlike their counterparts in the private sector, they cannot raise revenue (that is, taxes) indiscriminately, for that decision rests with political officeholders and, in turn, with an electorate that recognizes the wisdom of Justice Oliver Wendell Holmes: "I like to pay taxes. With them, I buy civilization." We can also assume that in the fishbowl that bureaucracy ultimately is, those who do not live up to expectations will be reprimanded and may even lose their jobs.

It may seem that we have transgressed from presenting a formal and neutral definition of bureaucracy into a defense of its existence, but we had a very good reason to do so. With his formal and ideal-typical definition of bureaucracy, Weber accomplished, inadvertently, two objectives in one stroke. First, he identified the elements of an organizational structure that he saw spreading like wildfire. Like his contemporaries he had neither knowledge about nor experience with this type of large-scale, hierarchical organization, and he wanted to warn his fellow humans against the possible dangers. Second, he defined an organizational structure for which no historical precedent existed. We will substantiate this statement in the next section. Meanwhile, Weber's definition of bureaucracy has become so common that it is almost difficult to imagine that it only characterizes the complexity of the organization of government from the late eighteenth century on (Morony, 1987, p. 7). That raises the question: When and why did bureaucracy appear in human history, and how did that bureaucracy in the past differ from its contemporary manifestation?

Bureaucracy in the Evolution of Human Communities: The Origin of the Stereotype?

The geoarchaeologist Fekri Hassan suggested that population growth occurred before the emergence of the state (1983), and that the first stages of expanded social cooperation were primarily economic or technological rather than militaristic and expansionist by nature (Masters, 1986, p. 161). In other words, conflict or war was not the primary cause for the emergence of the state.

Perhaps the earliest bureaucracies were those where people recorded transactions of goods. Indeed, the earliest known examples of writing are records of trade. We can safely assume that bureaucracies emerged at least 10,000 years ago in sedentary communities for both biological and power-political reasons.

The biological reason is perhaps indirect, but nonetheless real. Survival of the species depends upon cooperation and upon the ability to assure that genes are passed on to the next generation. At the end of the Paleolithic period and the beginning of the Agricultural Revolution some 10,000 years ago, the number of people who roamed Earth has been calculated to be about 10 to 15 million, about one per square mile (Corning, 1983, p. 304). It is easy to see that the globe back then was relatively empty, with small hunter-gatherer bands of 30–50 members living far apart from each other. We assume that these societies were almost completely egalitarian, and that cooperation came "naturally" since most members must have been related by kinship. Once people settled down and discovered the ability to produce agricultural surplus, their numbers quickly increased to about 50 million at the time that the first states appeared about 5,000+ years ago. In another 3,000 years there would be about 300 million people (Hassan, 1997, p. 6). Such rapid growth in population size requires institutional arrangements that secure that people are to some degree protected from one another (we cannot assume that all people will restrain their behavior so that others are free [see Chapter 5]) and from outside aggressors.

It has been long debated in anthropology whether the state emerged because of a need for intragroup cooperation or because of intergroup conflict (Masters, 1983, pp. 177 and 185). It might actually well be both, but for the purposes of this chapter and book, we need not address this question. What is important, though, is to note that within the group selfish behavior may occur, while conflict between groups increases chances of altruistic behavior within the group. Selfish behavior is visible within groups

when, for instance, people strive for advancement in social status and for emphasis upon status differentiation. As we argued in Chapter 2, social stratification will occur in societies where people no longer know everyone else. However, the group will operate as one when threatened by the outside world, each member recognizing that altruistic behavior will protect the group. In fact, altruistic behavior is needed when pursuing territorial expansion. In that effort, some individuals may lose their life, but the continued existence of the group is assured.

The power-political reason for the emergence of bureaucracies is that in socially stratified communities those in power will not be able to monitor the behavior of all members. In order to maintain some degree of control they need a support structure, a bureaucracy with people who do their bidding. These premodern bureaucracies are extractive organizations; they basically exploit the natural resources (produce, labor) of their populations to benefit the ruler(s) and the ruling class. Premodern bureaucracies are generally not service providers in the way that modern bureaucracies are. They serve as a "loyal and personally ascribed cadre of supporters" of the ruler or the ruling class, not as servants of the people (Yoffee, 2005, p. 140).

The more complex of these premodern bureaucracies were problem creators rather than problem solvers (Paynter, 1989). That is, the adaptive capability of any political-administrative system comes under stress once the political leadership, through a top-heavy bureaucracy, makes impossible demands upon the productive sector (Butzer, 1980). Indeed, civilizations declined because their governments became too demanding. In early modern Europe, discontent with government was generally fueled by unreasonable and extraordinary taxes, leading to tax riots and—sometimes—revolution (such as the American and French Revolutions).

Millennia of experience with a ruler-oriented bureaucracy fed the characterization that bureaucrats are only interested in advancing their own power, security, and comforts as long as that happens within the orbit of the ruler. In other words, those working in bureaucracy created selective benefits for themselves (Masters, 1986, p. 156). In the middle of the nineteenth century, Countess Bettina von Arnim (1785–1859), a politically active author in Prussia, wrote that high-level court advisers and ministers shielded the king from hearing about the plights of the people, and advised that government bureaucracy and corruption could only be countered by a people's monarch (Hallihan, 2005, pp. 58 and 94).

It is premodern bureaucratic behavior that is reflected in the stereotypes that people still hold and that is found in novels of administrative

fiction. An early example of a discussion about public servants in English novels is provided by Humbert Wolfe (1885–1940; a poet, and a civil servant who rose to high rank in the Ministry of Labor), who describes Charles Dickens's portrayal of those working in "The Circumlocution Office" in *Little Dorrit* as so cartoonesque that "whether he was misinformed or not, he has presented a picture of red tape, of callous indifference to justice and honour, of ignorance, of nepotism, of sheer overwhelming machine-like stupidity that has not been erased from the canvas of the Civil Service in the sixty odd years since it was written." (Wolfe, 1924, p. 44) Can it be that, no matter how well civil servants today do their work, it is simply very hard to shake off the image of bureaucracy handed down from the past and that became a stereotype? It does not take much for the stereotype to be confirmed. Wolfe concludes that two main types can be found in fictional work: the "mandarin-parasite" (such as the one Von Arnim described) and the "slave" who is destined to servitude for life (Wolfe, 1924, p. 41; see also Goodsell and Murray, 1995, p. 8; Samier, 2007, p. 8). To be sure, the mandarin-bureaucrat was always a member of the societal elites, the patricians, who regarded the populace as plebeians. From among these plebeians the bureaucrat-slaves were recruited to perform lowly tasks and functions with no access to policy and decision making. Bureaucrat-mandarins and bureaucrat-slaves can be found in numerous countries, but in democracies with highly professionalized bureaucracies they are less likely to abound. Unfortunately, we will find people in any organization, whether public, nonprofit, or private, who pursue their own goals rather than serve the public and organization's interest and who violate the intent of one or more of the dimensions of Weber's ideal type. No type of organization or set of rules can be developed that will constrain the few tempted to abuse the system. We suggest that modern public bureaucracies in Western societies have come closest to constraining the chance that individual interests trump those of the public at large. With regard to bureaucracies in the private sector, it has proven to be more difficult to constrain individual interests and then especially at the higher levels in companies and corporations (Khurana, 2007). Sadly, there are plenty of examples in the United States alone (see "After Enron, the Deluge.").

It is in the course of the nineteenth century that bureaucracies no longer only serve a ruler or a ruling class, but serve a citizenry and their government. Also, government bureaucracies no longer only extract resources from the population, they also provide many services. Bureaucracy today is very different from its historical counterpart. It will continue to do its work,

irrespective of the political party or parties elected into executive office. And it can continue to do its work because, in a democracy, it is almost impossible that one or a few career civil servants can acquire the power of a dictator with the exception perhaps of those in a military capacity. We reiterate that in democracy it is more difficult for those in power to use bureaucracy toward their own ends; in other words, bureaucracy is the "scaffold" that makes democracy work.

It has been suggested that democracy has biological, organic roots as well. Just like apes, people accept subordination when it is the only available alternative to being isolated from the group. But democracy is different. Consider the following: "If everyone really would *like* to be omnipotent and therefore the one dominant individual, and if really no one *can* be omnipotent, then people would rather compromise by being *equal* than by being *subordinate*. If the opposite were true—if people and/or monkeys preferred to be subordinate than to be equal—then there would be no more fights for top or middle positions." (Davies, 1986, p. 360; emphasis in original) The desire for democratic government is based on the premise that all people are created equal, and that it emerges when other and higher-priority needs can be satisfied without accepting subordination to a ruler. This intertwinement of democracy and bureaucracy is characteristic for modern societal culture, and we saw already in Chapter 5 and shall see again later that bureaucracy has more exploitative features when it is operated in a less or nondemocratic environment.

Societal Culture

In any study of comparative government it is extremely important to consider the societal culture in which government and its organizations are embedded. It has been popular to simply characterize administrative cultures in terms of groups or families of countries. For instance, Martin Painter and Guy Peters (2010, p. 19) distinguished between nine traditions: Anglo-American, Napoleonic, Germanic, Scandinavian, Latin American, Postcolonial South Asian and African, East Asian, Soviet, and Islamic. However, this type of categorization is a bit of a hodgepodge, mixing geographical, historical, and cultural features without explaining why this administrative tradition is there in the first place. It is far better to characterize culture in terms of specific features. In this section we look at specific features of societies at large, using the work of the American

anthropologist Edward Hall, the Dutch sociologist Geert Hofstede, and the Swedish political scientist Jon Pierre.

In a study about the nature of time in different societies E. Hall suggested that governments and businesses in the Western world are characterized by *monochromic time.* In such M-time cultures, as he called them, time is strictly regimented. People carefully schedule their activities and can plan a specific amount of time, days, weeks, even months ahead in an agenda. How it is possible to know what amount of time is needed for a certain discussion is not clear, but start and end time of a meeting are scheduled. All sorts of language and phrases indicate how valuable time is considered to be: It can be "wasted," it can be "saved," it can be "spent," it can be "made up," and it even can be "lost." Clearly, none of these are literally possible, but it is how people in countries such as Germany and the Netherlands think. In *polychromic time* societies (P-time) people are not very strict with scheduling, they may do different things simultaneously, and they have certainly a much more relaxed sense of time. The difference between M-time and P-time societies also translates into the extent to which people need trust before they can interact in a meaningful way.

Hall suggests that P-time cultures are *high-context cultures* where people first need to get to know each other and establish trust before they can work together and/or do any business. By contrast, *low-context cultures* do not require such deep interpersonal knowledge, and personal life and work are very segregated. As a consequence, detailed background information is necessary, and is even formalized as in, for instance, Charles Lindblom's "partisan analysis." In P-time cultures people are also more patient than those in M-time cultures (Hall, 1983, p. 45–47; Hall and Hall, 1990, p. 9). Policy evaluation is less important to public servants in P-time cultures, because it is considered not in sync with the sense of harmony between people. They rely more on intuitive understanding, while their M-time counterparts pursue policy evaluation and do so upon fact-based analyzed reasoning. Norway and Sweden are considered P-time cultures, while the United States is basically an M-time culture (Christensen and others, 2003, pp. 57–58). Germany and the Netherlands are also more M-time cultures, while Mediterranean countries (perhaps with the exception of Israel) and many developing countries can be more easily characterized as P-time cultures.

Hofstede's work is an excellent example of how a societal culture can be captured in dimensions and subsequently measured. The dimensions he developed out of a large survey of IBM employees in the late 1960s are illustrated in various settings (family, school, state, and workplace). We shall

briefly discuss each of his five dimensions with examples of the role and position of the state.

The first dimension, *large or small power distance,* refers to the extent that supervisors and subordinates are separated. In countries with a low power distance index (PDI), the relationship between boss and employee is one of interdependence and consultation, and authority is based on expert knowledge and formal position rather than on kinship, friendship, and charisma. In large power distance countries governments are often more oligarchic or autocratic. Northwestern Europe and North America are prime examples of areas with a small power distance where hierarchy exists but basically because it is convenient. Open displays of power and status symbols are "not done." Organizations with small power distance tend to emphasize decentralization. The number of managerial levels is less than in large power distance countries. With regard to government, small power distance countries tend to change their political system more commonly in an evolutionary rather than a revolutionary way. There is more discussion and much less violence in politics; and they tend to have pluralist governments based on majority voting. Finally, countries with a small power distance are also among the wealthier in the world and with a strong and large middle class. Generally, in most low power distance countries income differentials are relatively small, tempered by a progressive tax system. The United States, though, is different, since income differences are very large, and the tax system not very progressive. Examples of low PDI countries include Austria, Germany, the Nordic countries, the Netherlands, and Anglo-American countries. In large power distance countries, the situation is quite different. Officials show their status; organizations are much more top-down structured with clear boundaries between supervisors and subordinates. The political system is much less easy to change unless through revolutionary force. Politics in general tends to be more violent, and political party competition is more limited. This is a situation more characteristic of developing countries (Hofstede and others, 2010, p. 83). Asian, Eastern European, and Latin American countries have high PDI. In Table 6.1 we have listed the PDI and the rankings of the countries discussed in Chapters 9 to 12.

A second dimension of organizational and societal culture is the degree of *uncertainty avoidance,* which is defined as the extent to which members of society feel threatened by ambiguous or unknown situations (Hofstede and others, 2010, pp. 191 and 223). Do people experience job stress, do they rely on organizational rules rather than on each other in case of conflict, and do people stay with one company throughout their career (Hofstede and

TABLE 6.1. HOFSTEDE'S CHARACTERIZATION OF CULTURES

	Power Distance	Uncertainty Avoidance	Individualism/ Collectivism	Masculinity/ Femininity	Long-/ Short-term Orientation
Argentina	49 (52–53)	86 (17–22)	46 (35–37)	56 (28–29)	20 (78–80)
Australia	38 (64)	51 (57–58)	90 (2)	61 (20)	21 (77)
Belgium	D: 61 (39–40); F: 67 (30–31)	D: 95 (5); F: 93 (9–10)	D: 78 (8); F: 72 (12)	D: 43 (47–50); F: 60 (21)	82 (7–9)
Brazil	69 (26)	76 (31–32)	38 (41–42)	49 (37)	44 (49)
Canada	39 (62); Q: 54 (49–50)	48 (62); Q: 60 (47–49)	80 (4–6); Q: 73 (11)	52 (33); Q 45 (43–45)	36 (55–56)
Chile	63 (37–38)	86 (17–22)	23 (57)	28 (67)	31 (63)
China	80 (12–14)	30 (70–71)	20 (58–63)	66 (11–13)	87 (4)
Colombia	67 (30–31)	80 (29–30)	13 (72)	64 (14–16)	13 (87–90)
Czech Republic	57 (45–46)	74 (34)	58 (28)	57 (25–27)	70 (18–19)
Denmark	18 (74)	23 (74)	74 (10)	16 (72)	35 (57–58)
Estonia	40 (59–61)	60 (47–49)	60 (23–26)	30 (66)	82 (7–9)
France	68 (27–29)	86 (17–22)	71 (13–14)	43 (47–50)	63 (25)
Germany	35 (65–67)	65 (43–44)	67 (19)	66 (11–13)	83 (6)
Greece	60 (41–42)	112 (1)	35 (45)	57 (25–27)	45 (48)
India	77 (17–18)	40 (66)	48 (33)	56 (28–29)	51 (40–41)
Iran	58 (43–44)	59 (50–51)	41 (38)	43 (47–50)	14 (85–86)
Israel	13 (75)	81 (28)	54 (30)	47 (39–40)	38 (51–54)

(continued)

TABLE 6.1 (*CONTINUED*)

	Power Distance	Uncertainty Avoidance	Individualism/ Collectivism	Masculinity/ Femininity	Long-/ Short-term Orientation
Japan	54 (49–50)	29 (11–13)	46 (35–37)	92 (2)	88 (3)
Mexico	81 (10–11)	82 (26–27)	30 (48–50)	69 (8)	24 (74–76)
Morocco	70 (22–25)	68 (40–41)	46 (35–37)	53 (31–32)	14 (85–86)
Netherlands	38 (63)	53 (55)	80 (4–6)	14 (73)	67 (22)
New Zealand	22 (73)	49 (60–61)	79 (7)	58 (22–24)	33 (61)
Poland	68 (27–29)	93 (9–10)	60 (23–26)	64 (14–16)	38 (51–54)
Romania	90 (7)	90 (14)	30 (48–50)	42 (51–53)	52 (38–39)
Russia	93 (6)	95 (7)	39 (39–40)	36 (63)	81 (10–11)
Singapore	74 (19)	8 (76)	20 (58–63)	48 (38)	72 (16)
South Africa	49 (52–53)	49 (60–61)	65 (20)	63 (17–18)	34 (59–60)
Spain	57 (45–46)	86 (17–22)	51 (32)	42 (51–53)	48 (44)
Sweden	31 (69–70)	29 (72–73)	71 (13–14)	5 (76)	53 (37)
United Kingdom	35 (65–67)	35 (68–69)	89 (3)	66 (11–13)	51 (40–41)
United States	40 (59–61)	46 (64)	91 (1)	62 (19)	26 (69–71)
Zimbabwe					15 (84)

Based on: Hofstede, Hofstede, and Minkov (2010), pages 57–59, 95–97, 141–143, Legend: The first number is Index, the second number between parenthesis is Rank; Belgium, F = French, D = Dutch; Canada, first number is all Canada, second number is Quebec; two countries that are discussed in Chapters 9 to 12, Laos and Zimbabwe, are not included in the data of Hofstede and others (except Zimbabwe on the long-/short-term orientation); highest and lowest are index numbers.

others, 2010, pp. 190)? In countries where uncertainty avoidance is high, the workplace is generally populated by people with long tenures, while in countries with low uncertainty avoidance turnover or attrition is much higher. With regard to government, high uncertainty avoidance countries such as Greece, Portugal, Latin American countries, and Japan have a bias in favor of precision and punctuality and thus, for instance, emphasize detailed laws. Many civil servants have a law degree. In low uncertainty avoidance governmental cultures civil servants have wide-ranging educational backgrounds, and examples include Israel, the Netherlands, the Nordic countries, and Anglo-American countries.

It is also observed that high uncertainty avoidance countries generally have a negative attitude toward political and administrative officials and the legal system. That being said, how can it be that the United States is characterized as a low uncertainty avoidance country while having a very high distrust of government? The answer is simple. We must keep in mind that these dimensions of culture are generalizations. The ranking of countries in each of these dimensions suggests a rigidity that in reality does not exist.

The third dimension is that of *individualist and collectivist cultures,* where the designation "individualist" denotes a society where the ties between individuals are loose, where people are expected to take care of themselves (ibid., p. 92). It will not come as a surprise that the United States was ranked highest on individualism. Individualist societies pay more attention to the task at hand than to the relationships between employees and between employees and supervisors. The nature of the subordinate–manager relationship is one based on a labor contract, and it is certainly not perceived like an extended family as is the case in more collectivist countries. In individualist countries, government is supposed to play a restricted role in the economy. Government also is expected to treat everybody as equal under the law, while at the same time individual freedom is regarded higher than the ideology of equality of condition. Nearly all wealthy countries score high in individualism. However, it is suggested that pure individualist and pure collectivist societies do not exist.

In collectivist countries the individual is not as important as the cohesive in-group or as the society at large. Government is also less inhibited and adopts an interventionist role for the good of the whole. It is irrefutable that the United States has developed significant elements of a collectivist society. The policy and service reforms of the 1930s with regard to social security and employment and the 1960s changes concerning civil rights are illustrative of this. The welfare states of Western Europe are more collectivist

than the United States, yet they do protect individual freedoms to a considerable extent. Japan is like a Western welfare state but considerably more collectivist than Western European countries are. While industrialized countries tend be more individualist, there is no strict link between the two. Indeed, despite industrialization East Asian countries such as Hong Kong, Japan, Singapore, and South Korea are still quite collectivist. Less democratic developing countries are generally leaning more toward collectivism. Overall, collectivist societies outnumber individualist societies (Hofstede and others, 2010, p. 94). One characteristic of organizational culture and climate in the public sector is that at the middle and higher levels in most countries it is not very representative of the composition of the population. While governments in the Western world have led by example and consciously pursued efforts at increasing the representativeness of women and of minorities, this is still far from realized. This issue relates to the degree to which organizations and countries have *masculine or feminine cultures* (Hofstede and others, 2010, p. 180). In a masculine organizational culture gender roles are clearly defined: The male holds the main job, holds a position of authority in the family, and is expected to be more assertive; the female may hold a clerical job requiring her to serve others or may simply be expected to be an at-home mom, and she is also expected to be more caring and tender.

In feminine organizational cultures, gender lines are blurred or even nonexistent, and males and females can both perform the same functions. Hofstede's research placed the United States among other masculine countries such as Japan, Germany, Great Britain, and Poland, while the Scandinavian countries and the Netherlands are highly feminine countries. To be sure, this means that men also change diapers and do the laundry, while women may change the tires and paint the house. With regard to government, masculine societies support the strong competitor, are more focused on correcting behavior, and embrace an adversarial political-administrative system. Public-sector organizational culture in the United States has features of a marketplace where only the strong survive, and its bureaucracies have overlapping competencies and must compete for the budget.

One final dimension of societal culture is its *short- or long-term orientation.* Short-term cultures seek immediate gratification of needs, demand measurable value for money, and subject organizations that implement policies to extensive performance measurement. The electoral cycle may focus on the short term and, in that case, elected officials will not be inclined to think too much beyond surviving the next elections. With respect to electoral cycle, the United States is among the shortest in Western countries. What

impact does a short-term orientation have upon policy? One example can clarify this. In countries with a short-term orientation, the purpose of punishment is expressed in the degree to which people and their governments tend to lock their criminals up and keep them apart from society. In individualist countries, the criminal is sooner considered a problem because of personal behavioral deviancy than because of societal circumstances. Among Western countries the United States ranks first by far with regard to violent crimes such as homicide, rape, and robbery, and its incarceration rates are also considerably higher than in any other country. Private organizations in short-term orientation countries tend to focus more on the bottom line and on this year's profit. Politics and administration focus more on promises that can be achieved in a short span of time. However, some of the largest government projects in the United States have taken decades to unfold, so it is not as if short-term orientations automatically prohibit long-term policy and projects (Light, 2002). It is necessary to point out that we have defined short- and long-term differently. Hofstede defines short-term orientation as focused on fostering virtues oriented to future rewards (through perseverance and thrift), while long-term orientation fosters virtues that are related to the past and the present (such as respect for tradition, preservation of face, and fulfilling social obligations Hofstede and others, 2010, p. 239). China, South Korea, and other East Asian countries as well as Puerto Rico score high on long-term orientation, while Colombia, Iran, and Argentina score low (see Table 6.1).

It is important to keep in mind that how these dimensions manifest themselves over time is subject to change. A group of scholars replicated Hofstede's survey of the late 1960s 25 years later and found that the United States had simultaneously become more feminine as well as much stronger on uncertainty avoidance, while rankings for power distance and individualism had not changed much (Fernandez and others, 1997). It is equally important to emphasize that the value dimensions, and thus administrative cultures, vary from country to country; every government nowadays operates through sizeable bureaucracies (that is, structure), but how these bureaucracies function internally (their culture) is much more determined by features of bureaucracy as a personnel system than as an organization (see Chapter 8).

The third characterization of societal culture is represented by the distinction Jon Pierre made between the public interest and the *Rechtsstaat* models of the political-administrative system (1995). In the *public-interest model* the emphasis is on pragmatic and flexible decision making; it also allows for radical reforms that stress managerial change. In this model the role of the state is less extensive than that in countries with more of a

Rechtsstaat model system. Public-interest states are more performance driven and market oriented, and examples include Australia, New Zealand, the United Kingdom, and the United States (Pollitt and Bouckaert, 2011, p. 73). The *Rechtsstaat model* is one where legislative authority is the primary mechanism upon which government works. Any effort at managerial reforms must fit the legal framework, and so these systems are slower to reform (Pollitt and Bouckaert, 2011, p. 63).

In this section we have characterized societies as a whole and noted that these characterizations are not static. Organizations are embedded in their society, and their functioning and culture is generally in sync with that of their society. However, there are distinct differences between organizational cultures.

Organizational Culture

In terms of structure, most sizeable and large-scale organizations are bureaucracies; in terms of their functioning, they are very different. For instance, most organizations where employees are expected to be in uniform during office hours (military, police, firefighters) are much more hierarchical than nonuniformed organizations such as a social work unit, a school, or the Department of Home Affairs. Obviously, every bureaucratic organization operates as a hierarchy, but the extent to which that hierarchy is invoked varies. The differences between how organizations function notwithstanding, the stereotype of bureaucracy has prevailed (see Table 6.2). In Section 2 we suggested that the stereotype regards a bureaucracy that no longer exists: a bureaucracy that exploits subjects. In Western democracies bureaucracy generally is a service provider, hence the contrast between perception as visible in the stereotype and the reality of government organizations. In Chapter 5 we have seen how fragmented government is and that it is expected to meet multiple and often conflicting demands. Historically, bureaucracy was populated by "mandarins" and "slaves" who only served the political regime in power. Contemporary bureaucracy is highly fragmented, providing a large range of goods and services; is populated by civil servants who are highly educated; is generally citizen-oriented; and is indispensable to political officeholders.

An excellent example of how the functioning of bureaucracy varies with national culture is provided by Hofstede and others (2010, p. 243–245). They describe how an American professor, O.J. Stevens, teaching at the INSEAD business school in Fontainebleau, France, assigned a case study

TABLE 6.2. PERCEPTION ABOUT AND REALITY OF GOVERNMENT

	Abstract: Government as a Whole	**Concrete: Government as Subunits (Including Individuals)**
Perception	Big bureaucracy, inaccessible, inefficient, red tape, corrupt	Bureaucratic organizations and bureaucrats are self-seeking, formalistic, distant, corruptible, and power hungry; they follow the lead of elected officeholders.
Reality	Balancing myriad and conflicting demands; largest single employer; largest possible clientele; huge degree of organizational differentiation	Bureaucratic organizations and civil servants are proactive; citizen-oriented; concerned; professional; indispensable to politics.

Source: Raadschelders (2003, p. 324).

about a conflict between two department heads. In the exam the students were to outline how this conflict could be resolved. The class had students from various countries, but those from England, France, and Germany were in the majority. Stevens noted how the students came up with very different answers. The French generally felt that the two parties involved should take their problem to their immediate superior who would then settle the matter and thus provide guidance for how comparable problems in the future should be dealt with. In Stevens's interpretation, the French regarded bureaucracy as a "pyramid of people" with the CEO on top and each level in clearly defined relation to the other. German students perceived the conflict as evidence of lack of structure, and they advised establishing clear procedures for settling daily problems. In Stevens's words, Germans regarded bureaucracy as a "well-oiled machine." Finally, the English defined the conflict as one where the situation, not the hierarchy or the rules, ought to determine the course of action. In Stevens's parlance, the English perceive an organization as a "village market."

Hofstede and his coauthors linked this to the dimensions of organizational culture and to the University of Aston studies on how different organizations are structured (Hofstede and others, 2010, p. 305). With regard to the latter, the Aston researchers found that organizations vary in how authority is concentrated and how their activities are structured. The French students have grown up in a society with large power distance and strong uncertainty avoidance, hence why they advocated actions that further concentrated authority and structured activities. Growing up in a society with small power distance but strong uncertainty avoidance, German students favored structuring activities without concentrating authority. English students have been raised in a culture with small power distance and weak uncertainty avoidance, and so they supported neither further concentration of authority nor further structuring of activities.

Clearly, a pyramid of people relates to organizations with substantial power difference, because it is through the hierarchical structure that conflict is resolved. The village market organization has much smaller power distance; it is not the hierarchy but the people themselves who matter. And in machine-type bureaucracies a tendency toward fairly high uncertainty avoidance exists (Hofstede and others, 2010). Expanding these metaphors, in discussions with Asian colleagues, Hofstede identified an organizational type where the organization is regarded as an *extended family,* where the manager or owner is like a father or grandfather who is the ultimate authority and the employees are often highly loyal to the organization and stay for a long time (Hofstede and others, 2010, pp. 243–246). What the identification of the extended-family metaphor alludes to is the fact that many theories about and conceptions of government have a fairly strong Western bias. It is true, and we have touched upon this in Chapters 2 to 5, that Western governments have exported a range of administrative traditions and theories across the globe through colonization and through development aid. Some people argued that this would ultimately result in a homogenization of administrative practices and ideas. Others have pointed out that this is too simplistic a conclusion. While there are bureaucracies everywhere, they do operate in different societal contexts and are thus different in how they function. Furthermore, efforts to introduce Western-style reforms in developing countries generally have not paid close attention to the degree to which the indigenous societal context and institutional traditions will support such foreign-based reforms.

There is one element of organizational culture where governments across the globe are similar, and that concerns the visual appearance of government organization. We already noted that governments and their

bureaucracies are imaged in various arts such as poetry and novels, but also in paintings, architecture, and so forth (Heyen, 1994). The scholar who studied how government is visualized in architecture is Charles Goodsell in his research on the appearance and layout of American statehouses, city council chambers, and bureaucratic buildings. His descriptions and findings are relevant to any other country.

In his study of the statehouse, he noted how they are often set in parklike grounds emphasizing the relatively open, accessible nature of American state government. The state capitol articulates authority, and its most visible feature is the dome that exhibits three levels of meaning:

a. low or instrumental meaning: It draws attention from afar;
b. medium or status meaning: It identifies as state capitol; and
c. its high or cosmological meaning: It resembles a giant head of authority (Goodsell, 2001, p. 25; see also Rapoport, 1990).

The front of the statehouse is frequently raised above the ground and is reached by steps, providing a space from which to look at the world below. The steps are often surrounded by podium arms, reminiscent of the arms of a sphinx and suggesting energy. In the rotunda, visitors may see a chandelier hanging from the ceiling, reflecting an ancient idea about sacred space: the egg of creation floating in the world. Statehouses are built with stone, and that is remarkable since many structures in the United States are constructed with less durable materials such as a wood for the frame of a building. This means that government is here to stay. Next, the interior of the statehouse testifies to the fact that it is a building where decisions are made that affect us all, and this is further underlined by displays of the state seal, a state's founding document, and the mace as ancient and traditional symbol of authority.

Not only do statehouses exude authority, power, and prestige, they also show evidence of important moments in a state's history through murals, paintings, and sculptures of crucial events and renowned citizens, politicians, and legislative and executive officeholders. Another element that expresses government culture is the floor plan of a statehouse. Goodsell's book shows how in bicameral legislatures both houses are situated on the same floor and occupy roughly the same amount of space. Legislative chambers are often quite compact with the legislators seated at the same level, stressing that its members operate as a collegial body rather than as individuals. While the judiciary in all states (and in many countries) operates as a collegial body, the members of the bench are often seated on a raised platform, which emphasizes their authority. The nature of the

relation between legislature and executive is also spatially expressed. Until the 1920s the governor's office was usually situated in the floor below that of the legislature, suggesting subordination of the former to the latter. In the 1920s and 1930s the governor's and lieutenant governor's offices in several states were moved to the same floor as that of the legislature, suggesting equality of power.

Goodsell also studied how political authority is imaged at local government level, focusing on city council chambers. He argued that type of authority is expressed in spatial arrangements and distinguished three types: imposed, confronted, and joined authority (see Table 6.3).

In the traditional city council chamber, the council members face the presiding officer (mayor) who is seated on an elevated bench. There is limited seating for the public, and the room expresses authority through elaborate entrances, large windows, and private doors for the council

TABLE 6.3. CONCEPTIONS OF POLITICAL AUTHORITY

	Imposed Authority	Confronted Authority	Joined Authority
Nature of social control	Authority	Exchange	Persuasion
Nature of power	Consign— punishment in case of noncompliance	Compensation— rewards for cooperation	Conditioning— persuasion through education
Type of political rule	Monarchical, traditional sovereignty	Separation of powers	Direct democracy of the political community
Who governs	Administration by the best (aristocracy)	Politics leads, administration executes	Administration by the common man
Government– business relations	Government regulates the firm	Negotiated settlement with politically powerful private business	United industrial policy, cooperative regulation
Welfare conception	Paternalistic charity	Client-rights movement	Service coproduction

Source: put together on the basis of Goodsell (1988, pp. 202–204).

members. This arrangement expresses *imposed authority* where superiors (council members) exercise power over inferiors (citizens). This is a government run by the best, those who are called to govern by virtue of birth, and is a situation found in most of history. The second type of council chamber is related to *confronted authority* where the power of superiors is more balanced with that of the inferiors. There is much more space for citizens, and all council members face the public as a collegial body. Nowadays, council chambers are representative of *joined authority,* the third type, which conveys a sense of power sharing and a more subtle assertion of power. Additionally, the seating space for interested citizens is larger than in the other two types (Goodsell, 1988).

Bureaucracy also has its physical expressions, as Goodsell showed in an article analyzing the buildings of state agencies. He distinguished between three appropriate and three inappropriate types of public buildings. Of the three appropriate types, the best known is that of the *traditional temple,* often with a neoclassical and columned portico. It clearly evokes being a "public" building, with a clear entrance, and instilling a sense of pride (Goodsell, 1997, pp. 408–410). The *local curiosity* is also clearly a governmental building, but its architecture visibly displays a connection to the local region or community. It is a building that can be regarded as "ours," just as the traditional temple, but then showing more individuality and character. The *postmodern delight* is even more individual. The early seventeenth-century English author and diplomat Sir Henry Wotton suggested that architecture should display commodity, firmness, and delight (as referenced in Goodsell, 1997, p. 414). This type of public building then responds to color, light, convenience, spontaneity, and playfulness. These types are labeled appropriate because they invite people and thus underline the accessibility of democracy (see also Goodsell, 1988, pp. 10–13).

Inappropriate buildings are not inviting. The *bureaucratic box* looks just like any office building, public or private, with glass, steel, and concrete. The image is one of a blocklike mass, undifferentiated from other buildings and exuding a sterile impersonality. The *governmental fortress* comes across as massive and discourages access. Finally, the *consumer city* is a public building where public spaces are mixed with other spaces such as shops, restaurants, convention centers, and so forth. These are complex buildings, with multiple entrances, small "cities" with freely moving residents of employees and citizens alike. They display no clear statement of "publicness." The reader will find examples of these architectural images of public organizations anywhere, but briefly describing them is not the same as looking at the photographs in Goodsell's publications.

Bureaucratic organizations operate within a societal culture and express themselves architecturally in quite similar ways, but how they function varies. This variation in functioning is partly a consequence of specific tasks (i.e., uniformed services versus nonuniformed services), but also partly of differences in how individuals are perceived.

Perceptions of Public Individuals

In the public sector three categories of individuals can be distinguished: the political officeholder, the civil servant, and the citizen. How individuals working in public organizations are perceived varies with societal culture. Again, we have to consider stereotypes. In the previous section we opened with stereotypes about bureaucratic organizations and civil servants. In this section we consider these civil servants again, but now in comparison to stereotypes about political officeholders and citizens.

Political officeholders do not fare very well in public perception; the reality is more often than not superseded by the stereotype (see Table 6.4). The extent to which this is the case varies, but stereotypes about political officeholders in the United States may appear to be closer to reality (consider: promissory politics; short-term focus) than in, for instance, the Germanic and Nordic countries, France, and Israel. In many developing countries it may be that reality is comparable to what can be regarded as stereotypical in Western countries.

TABLE 6.4. STEREOTYPES AND REALITY ABOUT POLITICS AND ELECTED OFFICIALS

	Abstract: Politics as Actor	Concrete: Politicians as Individuals
Stereotypes	Short-term vision, "promissory politics," sound-bites, no substance	Lust for power, corruptible
Reality	Represents the common interest	Representatives of specific electoral interests; visionaries for change

TABLE 6.5. STEREOTYPES ABOUT AND REALITY OF CITIZENS

	Abstract: The Citizenry	Concrete: The Citizen
Stereotypes	Voting cattle, public policy too difficult to understand for lay people	Uninformed, entitlement mentality, uninterested, lack of civic duty and emphasis on rights
Reality	Limited knowledge about government	Active in interest groups, involved in public affairs relevant to personal life, emphasis on rights and duties

Political officeholders and civil servants cannot but have stereotypical images of citizens, but here the difference between stereotype and reality does not appear so large (see Table 6.5).

Given the subject of this chapter we will focus on stereotypes of civil servants, and one of the oldest is that which was published in a New York newspaper in October 18, 1787:

> In so extensive a republic, the great officers of government would soon become above the control of the people, and abuse their power to the purpose of aggrandizing themselves, and oppressing them. (Ketcham, 1986, p. 279)

This quote by "Brutus" in the *Anti-Federalist Papers* clearly describes the "mandarin-bureaucrat." At the time that this characterization of bureaucrats was printed, it was fitting. People knew that bureaucrats served those in power. However, just as the stereotype of bureaucracy has lingered, so has the stereotype of bureaucrats. Anthony Downs (1966) suggested that bureaucracies grow because their employees want to increase their power, prestige, income, and security. He was not very consistent since he also wrote in the same book, "The major causes of growth, decline, and other large-scale changes in bureaus are exogenous factors in their environment, rather than any purely internal developments." (1966, note 50, p. 263) Nonetheless, William Niskanen pursued Downs's initial stereotype and suggested that bureaucrats merely seek to maximize personal utility by

acquiring bigger budgets and more perks (1971, 1973). We believe that this is a human condition rather than something specific for bureaucrats, but we also know that bureaucrats are more frugal than what the stereotype suggests (see Dunleavy, 1991).

Many scholars have attempted to go beyond this stereotyping of civil servants as being of one homogenous type, and we will mention two examples. Downs distinguished between five types of bureaucratic personalities (1966, pp. 92–111). The *climber* is ambitious and on a fast career track. The *conserver* desires to maintain security and does not take risks. *Zealots* have narrow interests and usually are deficient general administrators. *Advocates* have substantial responsibilities and a significant overview of policies. Finally, *statesmen* are loyal to government and society as a whole. Hummel notes that the climbers, conservers, and zealots are the most bureaucratic (1977, p. 131).

Based on research in Israeli government, David Nachmias and David Rosenbloom (1978, pp. 31–32) describe four types of civil servants. The *politicos* are convinced that it is important to have political connections in order to acquire bureaucratic positions, and they are not very interested in the common good. *Service bureaucrats* take their cue from the public at large and seek ways for bureaucracy to improve how it allocates tasks to individual civil servants. The *job bureaucrat* is focused on the internal demands of modern government organizations. Finally, the *statesman* is truly oriented toward society and believes in achievement, education, and talent rather than in political and personal connections. Nachmias and Rosenbloom also categorized citizens according to their perception of bureaucrats. *Bureauphiles* expect to be treated as equals before the law, consider government to be fairly uncomplicated, and believe that bureaucracy is generally intelligent and fair. *Bureautolerants* come in two kinds: Some believe government is complicated, others do not. Some expect to be treated as equals, others do not. Bureautolerants often have a moderately positive perspective about government structure and its processes. Finally, the *bureautics* believe that they will not receive equal treatment and that government is infinitely complex and impenetrable. They are, in fact, repelled by bureaucracy.

Civil servants are the embodiment of bureaucratic organization. No one has "seen" a bureaucratic organization other than in symbols expressed through, for instance, architecture (see the previous section). What citizens across the globe regard as bureaucratic is very much influenced by the experiences they have with individual civil servants as well as by the stereotypical image that was handed down by the past and continues to

survive despite the fact that contemporary bureaucracy is very different from its historical predecessor. It is time that people reconsider the stereotypes of old times and wonder whether government today is one that none would want to do without.

Sucking Water from Straws or Opening the Tap in the Kitchen

In the 1980 movie *The Gods Must be Crazy* we can see a member of a !Kung band in the Kalahari Desert sucking up water through a reed that he stuck into the sand. For most of our history, and certainly until some 12,000 years ago, people simply took from the land whatever they needed for immediate survival. And most of what they took from their environment, they shared (except, of course, the water sucked up through the reed; that is a truly individual good). Today, we still share what we take from our environments, but when we do, we do so because we are forced to share. What forces people to share scarce resources are governments and their bureaucracies. We can open the tap in the kitchen and expect drinkable water. This is not so everywhere in the world, but it is certainly a global desire. In the modern world where many people live in urban environments, government and their bureaucracies are indispensable because people no longer know all of their neighbors. In today's imagined communities, governments' "scaffold of thought"—that is, the law—and their myriad bureaucratic organizations are a necessity. Bureaucracy is no longer *only* the handmaiden of those in power, at least not when we believe in the democratic theory that the people as a whole are *ultimately* sovereign. It is possible, and even vital, to believe in that democratic theory, for in a cynical mood people might succumb to the idea that power always coagulates into the hands of a power elite. But then, citizens know that bureaucracy is larger than politics; that political office-holders come and go, at the pleasure of the people; and that civil servants (who are citizens themselves) will be around, no matter what, to help and protect the people.

Today, bureaucratic organizations are populated by people we know; they are educated, they are professional, and their interest is that of the public and not only of those who were elected into office. Bureaucracy in history was the instrument, a predator, in the hands of a ruler and a ruling class; today it is an instrument still, but then in the hands of mostly competent people with a calling for public service. Since the American and French Revolutions people know that it is possible to overthrow an unresponsive government. There is no country today that does not have a bureaucratic set of organizations.

Bureaucracy is here to stay; Weber was right about that. In some countries it is well established and generally reliable; in many countries it is established but not (yet) reliable. We believe that democratization and bureaucratization are processes that cannot be reversed, save major natural disasters (such as what happened in the movie *Waterworld* with Kevin Costner in the lead role). In fact, democratization was possible because of bureaucratization, and that is even the case in the one country where democracy allegedly preceded bureaucracy (the United States).

We will never know whether Erik Satie would have written a different score had he been born a century later. He was Max Weber's contemporary, born two years later, dying five years later. His image of bureaucracy was not unlike that of Weber. They both imagined bureaucracy in its worst possible manifestation. They both were children of their own time, seeing but lacking the advantage of hindsight. And how could we blame them for casting what they thought, in their own time, to be true? In this chapter we described how bureaucracy has been perceived and how it has been defined. We have seen how bureaucracy in the past was very different from its counterpart in the present, and that this is mainly because it is no longer an instrument in the hands of the few, and that is what Weber captured in his ideal typical definition. In the next chapter we shall see how bureaucracies in the present manage their day-to-day affairs.

ORGANIZATION, MANAGEMENT, AND POLICY

Comparing the Competencies of Government and Public Administration

One of the core topics in the study of public administration is organization and management. Comparing such capacities among nations and cases is invaluable for both generic knowledge on how to run governments better and for pointing to differences among cases that make them distinctive and unique.

A closer look into contemporary knowledge in organization and management studies that is applicable to public administration and policy finds that it draws upon incorporation of the generic knowledge from subfields such as organization studies, global management, public finance and budgeting, human resource management, organizational behavior, and organizational psychology (Vigoda, 2002b). Hence, the focus in this chapter will be on the operational level of organizational activity, with attention to managerial competencies, the use of new public management (NPM) ideology in modern public administration, the incorporation of organizational technology, communication, behavior, and reforms in the study of modern governance.

The Human Side of Public Enterprise: Management, Organizations, and Behavior in Comparative Public Administration

A managerial definition of public administration proclaims that it is the executive function of government or a management specialty applied in public systems (Shafritz and Russell, 1997, pp. 19–23). Although public sector management is distinguished from private-sector management, in many ways the two systems share a surprisingly broad area of similarities (Rainey, 1990). For many years, differences stemmed from the nature of services each sector used to provide, from diverse structures and functions, but mainly from discrepancies in the environment. In a comparative view, changing the environment, moving among cultures and nationalities infuses an additional element of difference between public and private systems. Management is subject to differences in culture, values, and incorporation of change, technology, and ideas in a specific society. The change is, however, also asynchronously determined. From a historical point of view, we used to see much less use of management in public administration at least until the late 1970s. When the environment of public systems started to change more rapidly, public organizations had to change (again) as well. At least some of this change stemmed, undoubtedly, from the experience of others. The systematic study of such experiences, records of success and failure of management initiatives, and their implementation for a specific society were used by others in their effort to improve public services and policies. One example that will be developed later in this chapter is the internationalization of knowledge and the trend of policy transfer and emulation in a global world (Levi-Faur and Vigoda-Gadot, 2004).

What makes managerial and organizational knowledge so important for comparative public administration of the modern era? Looking back to the twentieth century, modern societies have become more complex, flexible, and dynamic. Cultural, industrial, technological, economic, and political environments of organizations have undergone rapid transformations that are still in progress. These transformations took various shapes and consumed different effort, time, and resources in various countries. A handful of examples of such changes and reforms in policy and management will be offered in Chapters 9 to 12. The general idea, however, is that public and private organizations had to adjust and respond to changes in the environment to safeguard their interests and existence. However, the nature of their adjustment differed. The public sector had to comply with political

restraints enforced by ideological aspirations of the people and of politicians as representatives of the people. At the same time the private sector had to adjust and respond to the challenge of markets and free economy (Osborne and Gaebler, 1992). In many ways, the starting point for public organizations to adjust to environmental changes was more limited than that of private organizations. While the former were restrained by the political system, the latter were liberated by the icon of free markets and global economies. Moreover, the role of governments in each society, and the meaning of the "public" for policy makers, varied from country to country (Vigoda, 2000; Vigoda-Gadot and Cohen, 2004; Vigoda-Gadot, Shoham, and Schwabsky, 2010). The prime example is the deep gap between the countries of the old continent (Europe) and the United States in the New World with regard to the meaning of the welfare state and the extent of responsibility of governments for their citizens.

A comparative look into development and change in those and in other parts of the world testifies, however, to quite similar processes of urgent calls for rethinking and reinventing government, especially since the 1970s. In recent decades, managerial tools developed by scholars and scientists in business administration became popular and effective in managing government agencies, in a scope and magnitude not experienced in the past. Conventional wisdom globally accepted a classic assumption regarding the relatively stable and unshakable structure of public organizations. Drawing on the Weberian approach, hardly anyone in any of the world's developed and modern nations disputed the need for large bureaucracies in democracies. But bureaucracies differ (Heady, 2001), and one major element of difference is how managerial and organizational knowledge and experience is used (Vigoda-Gadot, Shoham, Ruvio, and Schwabsky, 2008). In other words, whereas the mode in which bureaucracies function varies by culture, they are quite similar in how they are structured. That is, academics and practitioners dealing with the challenges and barriers of modern public administration agree that any nation, regardless of time, culture, and political ideology, must rely upon large and strong bureaucracies. A weighty bureaucracy has emerged simultaneously with the extension of governments' responsibilities and with citizens' expectations for more and better services (Vigoda-Gadot, Mizrahi, Miller-Mor, and Tevet, 2008). Even today the consensus is that governments in democracies and beyond must use large bureaucracies as a vehicle for responding to citizens' growing needs and demands.

The winds of change came relatively late in the previous century. After the Second World War people had higher expectations of their governments that were faced with practical economic and political problems of the

expanding welfare states. Comparative studies have shown a worrying decline in government's economic stability as evidenced by rising budget deficits on the one hand, and of public sector efficiency on the other (see, for instance, Rainey, 1990; Peters, 1996). From Britain to France, across Germany, Italy, Scandinavia, and other European countries, to North America, Australia, and into Asia a sound call had emerged in the 1980s for reforming governments' capacities to manage public goods and better respond to citizens' growing needs. This wave of change was also felt quite significantly from the late 1980s on in Eastern Europe and Latin America, and in various parts of Asia. The emergence of new public management (NPM) ideas suggested that governments can and should use knowledge of the markets to improve public services. Each nation and culture used the (new) managerial knowledge differently (Vigoda-Gadot and Meiri, 2008). Looking into managerial reforms in many Western societies testifies to the unique slants for each culture (Pollitt and Bouckaert, 2011). Basic assumptions about the validity of generic and culture-blind prescriptions for better running of government were questioned. The first challenge was to justify the centrality of management ideas in public administration and policy, not merely as a technical tool for public managers but also as a model and sector prototype of policy making.

Management in the public sector matters also because citizens' demands increase and because these demands are different from country to country (Vigoda-Gadot, 2007; Vigoda-Gadot and Mizrahi, 2008). A British citizen differs from a French citizen, who differs from citizens in other European countries, in Asian countries, in the Arab world, in Eastern Europe, in Latin America, and in North America. In each of these world regions governments should use management tools differently, taking into account the sensitivity of people, the ambitions of minorities, the geopolitical variables, and the socioeconomic variants of the population. In other words, the changing ladder of values and priorities of citizens determines the type of managerial remedy to social ills, as suggested by government and public administration agencies. Notwithstanding, and from a comparative point of view, the one similarity among nations is the growing standards of performance expected from (democratic) governments. These are more numerous today than at any time in the past, and are expected to grow in the years to come. Performance, as perceived by people and in scientific studies, is associated with many indicators such as quality of management, professionalism, motivation, good citizenship, leadership, ethics, and even emotions and moral behavior of public servants in each nation (Vigoda, 2002c; Vigoda-Gadot and Meisler, 2010; Vigoda and Golembiewski, 2001; Vigoda-Gadot, 2007;

Vigoda-Gadot and Drory, 2006). Perhaps this perception has guided some recent developments in public administration thinking, making it client oriented and more businesslike. Scholars frequently define these shifts as the principal change in public administration and its transition into a revised field of study named *public management.*

The Public Management Revolution: Comparative Views

Since the early 1980s much work has been conducted in public administration theory and practice that claims to go beyond the conservative approach in the field. This "liberalization" of public administration is recognized today as the new public management (NPM) school of thought. The self-identity problem of public administration was greatly aggravated by the launching of the idea of NPM. As noted by Kettl and Milward (1996, p. vii), "public management is neither traditional public administration nor policy analysis since it borrows heavily from a variety of disciplines and methodological approaches." Mainly drawing on the experience of the business/industrial/private sector, scholars have suggested taking a more demanding attitude to the dynamics, activity, and productivity of public organizations. However, "competing academic disciplines dueled to establish bridgeheads or, worse, virtually ignored each other as they developed parallel tracks on related problems." (Kettl and Milward, 1996, p. 5). Consequently, cross-fertilization, which could have accelerated learning and improved performance of public systems, was delayed.

Unsurprisingly, this lack of intellectual exchange caused redundancy of effort in the comparative track as well. Whereas comparative public administration studies frequently focus on specific research objects (for instance, countries, organizations, regions, local authorities, individual policies), a comparison of results and findings offered by different disciplines and coming from different places is almost unavailable in the literature. A recent summary of comparative articles in public administration (Fitzpatrick and others, 2011) summarizes the trends in comparative research in public administration of the last decade. Out of the 151 articles analyzed for that study only 18 (12 percent) focused on NPM and on the businesslike avenues for running government. This is a marginal figure compared with the hundreds, perhaps thousands of publications dealing with the managerial revolution in government over the same period of time.

NPM became extremely popular in the theory and practice of public arenas only in the third quarter of the twentieth century (Vigoda, 2003b);

however, its comparative aspects are still unclear to many of us. Relying on an extensive survey of public management research in America, Garson and Overman (1983, p. 275) argued that its increasing popularity was due to the more virile connotation of the term "management" when compared to "administration." Over the years, a growing number of political scientists have perceived public administration as an *old* and declining discipline. Some even used the term "dinosaur" to reflect its vanishing nature (Vigoda, 2002b). Others, and perhaps more so in the study of public administration, have found the term "administration" as relevant today as it was 100 years ago (Raadschelders, 2003, 2011b). It was suggested that public management rather than public administration could contribute to a new understanding of how to run the government more efficiently and thereby to surmount some of its pandemic ailments. As management was considered a more generic scholarly field, some even expected that comparative aspects would become less important in view of the greater paradigm and its potential generalizing power. NPM offered that generic, well-accepted managerial tools, techniques, knowledge, and skills could be used to turn ideas and policy into a (successful) program of action, regardless of nations, cultures, structures, or social values. And once again, despite availability and accumulation of knowledge from so many perspectives, nations, and cultures, only a few comparative studies of NPM were conducted. In many public organizations and government-controlled agencies, no significant use of comparative tools or methods is evident in the literature (Fitzpatrick and others, 2011).

Comparative methods in the study of NPM are also noteworthy. While the emergence of NPM is frequently related to the increasing impact of positivist behavioral science on the study of politics and government (for instance, Lynn, 1996, pp. 5–6), the practical aspect of this process should also be considered. Practical public managers (Golembiewski, 1995), as well as political scientists, refer to the difficulties in policy making and policy implementation that confronted many Western societies in Europe, America, and elsewhere during the 1970s. These practical difficulties are viewed today as an important trigger for the evolution of NPM. Reviewing two books on NPM (Aucoin, 1995; Boston and others, 1996), Anne Khademian (1998, p. 269) argues that American and British advocates of the field find common ground in explaining why such reforms are necessary. The problem of an inflexible bureaucracy that often could not respond efficiently and promptly to the public needs conflicted with some basic democratic principles and values in these countries. More than a decade later Vigoda-Gadot (2009) extended this idea to denote a major paradox for modern democracies. The common ground for building strong

nations can be found in the bureaucracy-democracy paradox. A comparative look into the strengths and weaknesses of many democratic nations reveals that strong nations are those that find ways to peacefully live with the paradox, minimize its danger, and maximize its potential for improvement. Hence, reducing the tension between managerial/bureaucratic goals and social/democratic values is a key to better governance.

Adopting a comparative view, Peter Aucoin elegantly summarizes a "trinity" of broadly based challenges with which Western democracies have struggled, and will probably continue to struggle in the future, partly through management reform. These are (1) growing demands for restraint in public sector spending, (2) increasing cynicism regarding government bureaucracies' responsiveness to citizens' concerns and political authority and dissatisfaction with program effectiveness, and (3) an international, market-driven economy that does not defer to domestic policy efforts. A comparative view of developments in many Western governments in America, Britain, New Zealand, Canada, and elsewhere led to the recognition that sound reforms and changes in public service should be made.

Comparing the Sectors

A comparative examination of the private and the public sectors has also changed the way scholars look at public administration (Murray, 1975; Rainey, 2003). Comparative study testifies that at least some of the accumulated wisdom of the private sector in various countries is transferable to the public sector (Pollitt, 1988; Smith, 1993). In an attempt to liberate the public sector from its old traditional image and tedious practice, NPM was advanced as a relevant and promising alternative. In the NPM literature, and mainly through comparative studies, authors have tried to recognize and define new criteria that may help in determining the extent to which public agencies succeed in meeting the growing needs of the public. NPM supporters, across countries and cultures, have continuously advocated the implementation of specific Performance Indicators (PIs) used in private organizations to create a performance-based culture and matching compensatory strategies in these systems. It has recommended that these indicators be applied in the public sector (see, for instance, Smith, 1993: Carter, 1989) since they can function as milestones on the way to improve efficiency and effectiveness of public agencies.

Moreover, citizens' awareness of the performance of public services was suggested as a core element of NPM since it can increase the political pressure

placed on elected and appointed public servants, thereby enhancing both managerial and allocative efficiency in the public sector (Vigoda-Gadot and Mizrahi, 2008). Scholars who advocate NPM in many Western democracies argue that this process of public accountability to stakeholders/citizens is similar to the role adopted by executives providing financial reports in the private/corporate sector (Smith, 1993). Compared with the private sector, increasing external-related pressures can have a profound impact on internal control mechanisms, as managers and public servants become more sensitive to their duties and highly committed to serve their public customers.

In view of the foregoing, Lawrence Lynn (1998, p. 231) suggested that the prospective NPM had three constructive legacies for the field of public administration and for democratic theory and practice. These were (1) a stronger emphasis on performance-motivated administration and inclusion in the administrative canon of performance-oriented institutional arrangements, structural forms, and managerial doctrines fitted to particular context (in other words, advances in the state of the art of public management); (2) an enhanced international and comparative dialogue to bequeath a stronger comparative dialogue and a stronger comparative dimension to the study of state design and administrative reform; and (3) the integrated use of economic, sociological, social-psychological, and other advanced conceptual models and heuristics in the study of public institutions and management, with the potential to strengthen the field's scholarship and the possibilities for theory-grounded practice.

Unsurprisingly, the latter two legacies are strongly rooted in a comparative perspective toward public administration. Kettl and Milward (1996) argue that one of NPM's most significant contributions to public administration as a discipline in transition is the focus on the performance of governmental organizations. We should add that a comparative look into methods and rationale leading to this performance measurement "movement" is highly important. It may enhance our understanding of how we can improve the measurement of public services and eliminate the risk of following false tracks. This must include attention for how knowledge and experience from one culture and environment are disseminated to another. According to this, a scientific orientation needs to draw on "a wide variety of academic disciplines for the full and richly textured picture required to improve the way government works. Only through interdisciplinary cross-fertilization will the picture be rich enough to capture the enormous variety and complexity of true public management (and administration) puzzles." (Kettl and Milward, 1996, p.6) Undoubtedly, a comparative approach is the one that can allow such progress in our time.

The Implementation of NPM in Western Democracies

Learning from the experience of a number of other countries, and especially those representing Western democracies in the last decade, suggests a number of observations based on the series of NPM managerial challenges. It seems that the main patterns of the required change characteristics and their expected trends can be discerned mainly from the experience of several Western societies such as the United States, Britain and the European continent, Australia, Canada, and New Zealand. However, studies from the developing world are also of great interest and advantage. A major study by Gerald Caiden and Naomi Caiden (2002) exemplifies the use of such comparative tools for the understanding of NPM impacts in various nations. In the next subsections we use their study as a major source for this comparison.

The United States: Measuring Performance

The main contribution of the United States to the development of NPM came from the improvement of performance and process measures. The basic assumption was that without an ordered decision upon measures and methods to evaluate performance, both the administrative process and the democratic process of the public's supervision on the government's performances were being compromised. Federal government in the United States especially stressed this in the "Government Performance and Results Act" (GPRA), which was approved by the Congress in 1993. Governmental organizations and agencies were requested to develop detailed measuring strategies for their products by identifying goals and purposes, studying the possible influences upon them, and tightening the tie between performances and long-term goals. As part of this process, all governmental agencies were obliged to consult Congress and other stakeholders when needed.

This development switched the focus of discussion to issues of performance and results instead of wallowing in issues of processes and resources as had been previously accepted. This is how the term "performance budgeting" has also been viewed; that is, as the means to improve decision-making processes as an aspiration to boost performance. On the other hand, a number of difficulties have also been revealed in the process, and these stemmed mostly from the need to achieve ambitious and long-term goals, which have not always been under the aegis of governmental authorities. In a great number of cases, the initiative, control, and supervision over government's activities lie with the

states or the local government, while the federal government has had only indirect responsibility and involvement. Nevertheless, the main achievement of this focus on performance evaluation has been the implementation of a methodical and ordered process of studying policy products and evaluating their meaning in terms of outputs and outcomes. Nonetheless, as Lynne Weikart (2001) suggests, performance measurement in American-style NPM was but one major wheel in a vehicle of managerialism. It had to work simultaneously with additional components such as the ideas of downsizing government, decentralization, privatization, and de-bureaucratization, of the federal, state, and local American machineries.

Britain: Who Comes First, the Public or the Nation?

The roots of the reform processes in British public management were planted back at the time of the Labor government at the end of the 1970s, but gained momentum with the rise of the Conservative Party headed by Margaret Thatcher. Throughout these years, public policy known as "Thatcherism" included a dramatic reduction in the central government's involvement in the provision of direct services to the citizens. This policy included growing privatization in fields such as transportation and media and, thus, increased market competition and reduced the size of bureaucracies, while introducing an economic logic into the activities of public agencies. However, since the 1990s, the British government has acted mainly to allow political, managerial, and mostly budget decentralization in areas such as Wales, Scotland, and Northern Ireland. In many respects, the purpose of this activity was to bring the government closer to the citizens and to reduce the "remote control" approach.

Besides the managerial benefits, it contributed to the political stability of the United Kingdom. Both the mutuality and exchange between the different areas increased, but most important, they achieved the status of a managerial autonomy, which was characterized by a greater democracy and freedom of choice for citizens. Thus, British public management became more sensitive toward the citizens while increasing the level of responsiveness through the "Citizens' Charter." In March 1999, the government published the next expected steps for the continuation of the reforms as part of the "White Paper." These steps were named "Modernizing Government" and stress the new role of the government.

The emphasis was on the fact that the government does not exist for its employees, but rather for the people and the individuals as citizens and

clients. It claims that civil servants should be appreciated, nurtured, and promoted, but at the same time suggests that demands for better performance, cooperative work, sensitivity, and consideration toward the individual should be part and parcel of any public servant's activity. Therefore, the government's plan has been based upon five main components: planning of long-term public policy, encouraging a responsive public service, emphasizing technological improvement, stressing information availability, and improving the public service's image.

The European Continent: Cultural Gaps beyond a Few Generic Similarities

The flow of NPM-oriented thinking throughout Europe started in the late 1970s and is still under way today. It reflects a tremendous change in the theory and practice of Western European public service compared with the pre-Second World War period (Barker, 1944). Recent comparative studies are only a few examples of the ongoing debate about the decreasing likelihood of finding a generic model of NPM that is equally effective and useful for all Western democracies such as Italy, France, Greece, Portugal, Spain, and even Germany and the Netherlands (Ongaro, 2009; Barzelay and Gallego, 2010; and Pollitt and Dan, 2011). Public management reforms and modernization are implemented differently, as the policy cycles of every nation take a different shape throughout the years.

For example, Edoardo Ongaro (2009) turns to major differences between the studied nations such as the politico-administrative context and the influence of Europeanization on public management reform. He points to some countries' higher compatibility to global paradigms of NPM reforms (for instance, Italy and Spain) compared with other countries with a much lower level. He points to the centrality of the "Napoleonic tradition" and its uniqueness compared with the Anglo-Saxon tradition. Ongaro finds major differences in the way political reforms and administrative reforms interact, and embedded in a specific (organizational and national) culture that shapes the type of reform. The differences between the studied countries are wide, in terms of public servant recruitment and training, in the way services are delivered to citizens, the perception of citizens as customers, the budgetary process, and the watchdogs of reforms and change such as the auditing and judiciary systems.

Taking an even wider European perspective, Christopher Pollitt and Sorin Dan (2011) discuss the impacts of NPM across Europe and observe a paradoxical situation. They suggest that "on the one hand there have been endless publications by academics and practitioners concerned with

NPM-like programs and techniques. Yet, on the other hand, our solid, scientific knowledge of the general *outcomes* of all this thinking and activity is very limited. Claims and counterclaims outnumber hard, carefully collected evidence by a substantial margin. That was the case in the mid-1990s, and it remains the case today. A summarizing graphic metaphor might be that there is an ocean of studies of the application of NPM ideas within the European Union (EU), but only a modest sea of works that offer direct empirical analysis of *outputs,* and no more than a small pond that convincingly connect specific reforms to particular *outcomes.*" (Pollitt, 1995, pp. 32–33).

Accordingly, and based on a vast database of 26 countries (including EU and non-EU countries such as Switzerland, Norway, and Croatia) they suggest the following summary (Pollitt and Dan, 2011, pp. 33–34):

1. Performance-related pay requires a long list of supportive local conditions before it stands a good chance of working as intended. In particular it tends not to work well where (a) political patronage determines most senior appointments, (b) the bonuses available are only a very small percentage of the total remuneration, and (c) the work is hard to measure in an objective and widely accepted way.
2. Performance targets can definitely have a significant impact on performance, but usually only where backed up by significant penalties/incentives.
3. Contracting out often fails to yield significant savings, particularly in the medium and long term. Necessary supports include (a) the possession of contract design and management skills by the staff of the parent public sector organization, (b) the presence of real competition (which may exist at first but then disappear because of private sector mergers and takeovers), and (c) that the activity being contracted is one that can be specified in fairly firm detail.
4. Use of market-type mechanisms (MTMs) may work better in simpler, more standardized services than in complex, unstandardized, professionalized human services.
5. The politico-administrative culture is mentioned as a significant factor shaping reform impacts in many countries—especially in Eastern and Central Europe, but also in the West.

Australia: The Administrative Responsibility Approach

The NPM approach permeated the Australian public management mostly toward the end of the 1980s. The government sector and structure, which

had been used to centrality, "heavy activity," and systematic ineptness, received the change initiative with enthusiasm. The change included a drastic cutback of governmental standards. Stress was on organizational products, a division between purchasing/maintenance and the provision of product roles, development of contractual mechanisms of accountability, and abandonment of the tenure-based employment method in the public sector (Hood, 1991).

However, the main characteristic of change in Australian public management was "Administrative Responsibility and Accountability," which stands for the increase in direct responsibility of civil servants for their actions and views managers as directly responsible for their decisions in addition to the direct political responsibility that those elected by the public have toward the citizens. Changes occurred across the board in Australian administrative law and a legal framework has been set up to enforce this responsibility. This means that managers are required to account for their decisions, their implementation, and even for their decisions for not acting or executing.

Clearly, this process was accompanied by the extension of the public complaints offices' mechanisms at the federal and the national level. The Australian public auditing office was extended, and a major change in the public's attitude toward public administration systems and their responsibility for the individual took place. In addition to the Administrative Review Committee, which had been set up in 1976, various other bodies were established. These include the Administrative Appeals Tribunal, Immigration Review Tribunal, Industry Commission, The Refugee Review Tribunal, Social Security Tribunal, and the Veterans' Review Board. This process also included comprehensive legislation on the issues of freedom of information, access to archives, and law protecting the privacy of citizens.

Canada: Collaboration in Research and the Shaping of Public Policy

The changes and reforms in Canada have arrived from different directions (Peters and Savoie, 1998), but are all based on a limited number of basic assumptions: (1) maintaining a strong government is essential for the protection of the state; (2) evaluating the government's role in the future is important; (3) a well-performing public sector is highly related to a modern policy of providing services to the citizens; (4) nurturing professional civil servants and those who have an independent way of thinking; and (5) encouraging wise governmental and administrative leadership, which gives direction and backing to those who deal with public service roles (Caiden and Caiden, 2002).

At the beginning of the 1990s, Canada suffered a budget crisis, which badly influenced its investment in development and research and also damaged the implementation of advanced public policy processes. The main criticism against the federal government has been that coordination and direction are missing in the work of governmental agencies, and that public policy in various fields is wanting since knowledge, tools, and experience are not being transferred from one field to the other. As a result, it has been claimed that public money is being wasted and not efficiently managed, and that a horizontal coordinative and integrative action between the different bodies is required. In 1995, the Task Force on the Management of Horizontal Policy was established. Its role has been to centralize the policy issues, which involve more than one office, and to manage the respective activities a little better.

In general, the task force was requested to create a cooperative culture of policy making and implementation, and to form a commitment amongst governmental agencies to coordinate work while constantly and rapidly transferring ideas, information, and learning mutually from past experience. In 1996, the Policy Research Committee was established, whose aim was to assist the government in preparing for cooperative work among public organizations and to implement coordinated public policy by 2005. This committee produced two main reports, which focused on the means to increase the collaboration and coordination between the different market sectors at the national and international levels. The activity of this committee was the first step in a process called "The Policy Research Initiative." As a part of this framework, a Secretariat for Policy Research was established in the federal government. Moreover, the proclaimed intention of this process was also to export the conceptual-cultural change in the format of the all-inclusive policy approach to other countries.

New Zealand: The Reshaping of Welfare Policy

In the last decades or so, an urgent need to cut back the size of the bureaucratic apparatus has arisen. For this purpose, accelerated processes of privatization, governmental decentralization, reduction in the number of public sector employees, and increase in the collaboration with private bodies (which would perform activities that have been hitherto in the domain of the government, also called outsourcing) has begun. Government initiated a comprehensive plan, which has greatly reduced the rate of national expenditure for the purposes of welfare. It has introduced components that encourage internal and external competition in the public

sector's environment, attempt to lower the taxes, and maintain fairness in the distribution of national resources. The plan has also encouraged reliance on the country's own resources. It aims at increasing the emphasis upon the public sector's efficiency, citizens' freedom of choice, and mutual relations between service providers and clients as opposed to the former pattern according to which the citizen is dependent upon the government and its institutes (Boston and others, 1999).

According to Caiden and Caiden (2002) the switch to harsh budgetary restraint has indeed managed to rescue the country and its public sector from the crisis it had fallen into. Yet the harsh recuperation process has left its signs among different social groups, which now have to get accustomed to much weaker support from the government. The gap between the rich and the poor has grown, and at the end of the decade many people in New Zealand are yet to taste the influence of the new management reforms in their lives.

Israel: Decentralization and Privatization

Certain motives of the NPM approach have entered Israel in the last three decades. The main changes in the Israeli public sector since the 1970s are based on two main components: a real revolution in the field of decentralization (for example, the transfer of managerial authorities from central to local government and the awarding of greater freedom to act in terms of budgetary management in different government offices), and growing privatization since the mid-1980s. At the same time, there is a strengthening of processes such as raising the transparency regarding governmental activity, nurturing managers and institutes' accountability to the public, and involving the public auditing system in fields it had not dealt with in the past (Friedberg, 1999). However, it seems that in other fields such as the reduction of bureaucracy and the promotion of structural changes in public organizations, the introduction of a new managerial culture, especially in the field of performance evaluation of public organizations, the steps are smaller and slower and therefore the challenge for change remains great.

Israel was born as a welfare country with a market and society managed in a highly centralized way (Mizrahi and others, 2009, 2010), and which were characterized by three main sectors: the public and the private sectors and the Employees' Federation, the *Histadrut*. The country's values as a welfare state included the aspiration to provide social security, maintain quality of life, and reduce inequality (Doron, 1985). In order to achieve

these goals, the intersectoral power structure during the country's first years had clearly leaned toward the public sector and the *Histadrut*. These have usually acted in a cooperative and coordinated way (a corporatist model) and stopped the introduction of reforms and changes, which have threatened social values. This power structure has changed completely since the end of the 1980s and the beginning of the 1990s when, on the one hand, the dominance of the *Histadrut* greatly deteriorated and, on the other hand, global trends with greater efficiency and focus on business management in the public sector increased.

Even though the governmental and public committees have been able to keep the issue of change and reform on the Israeli public agenda, close study would show that the public management changes focus on only the organizational, structural, and financial dimensions of the government's branches. They all lack a systematic approach to the introduction of a new managerial culture into the government, and there is insufficient focus on the development of appropriate tools for the behavioral performance evaluation of the public sector. As a result, most of the knowledge we have today centers on the attitude toward changes and reforms on the formal aspects of the public system's structure and organization or, alternatively, on its activities and performances from an economic perspective. The latter deals with the functioning of the budget or with the other issues of resource allocation, and does not make use of tools from the social sciences field, whose efficiency and contribution to the improvement of public service is proven.

The experience of countries such as Canada and the United States shows that performance evaluation can be done using systematic and prolonged studies of citizens' approaches and their status as the public sector's clients, as well as interorganizational studies that focus on public sector employees. Israel is getting gradually integrated in this trend as part of a new international project, the National Assessment Project of Public Administration (NAPPA), whose aim is to comparatively evaluate the functioning of public organizations in Europe and Israel through tools that require the integration of a perceptional/behavioral evaluation with a classic economic and technical evaluation (Vigoda-Gadot and Mizrahi, 2001–2013).

The Implementation of NPM in Other World Regions

NPM reforms have not skipped other parts of the world, and countries in Asia, Eastern Europe, Africa, and Latin America have gained knowledge and experience that have allowed meaningful reforms in government services.

Asia

One should expect major differences of public administration systems and processes among various types of Asian countries. Differences are evident, but too little is known *about* the nondemocratic systems such as China or North Korea compared with other, more liberal countries. Bing Cheung (2010) examines the checks and balances in China's administrative traditions to find that its system is centralized and unique, based on the older Chinese tradition of hierarchy and obedience. A comparative study examined NPM in four South and Southeast Asian countries: Singapore, Malaysia, Sri Lanka, and Bangladesh (Samaratunge and others, 2008). The study reveals that political history, party politics, macroeconomic consideration, state tradition, the role of international development agencies, and the state of civil society are critical factors in determining the outcomes of such reforms. The study found that the type of change and the extent of reform initiatives in these countries were different. The reform programs in Singapore and Malaysia were relatively comprehensive, and the necessary infrastructure was put in place. In addition, strong political commitment and leadership expedited these reforms. Lee and Haque (2006) suggest that the logical thinking of NPM reform is highly compatible with Singapore state tradition. The performance-based bureaucracy is an integral part of state ideology and culture. A trustee model of relationship between government and citizens, as suggested by Vigoda (2002c), may be suitable to describe democracy in these countries. This model justifies delegating wide discretionary power into the hands of political and administrative institutions in return for good results.

Ramanie Samaratunge and others (2008, pp. 44–46) point to public service improvements in Malaysia as a key issue of the reform.[57] "The structures and traditions of the career service have proved very resilient, and have served to create a bureaucracy that is both relatively competent and insulated." (Painter, 2004, p. 367) Both Singapore and Malaysia have strong market forces and have introduced massive economic development programs, which demanded an efficient and capable public sector. Singapore may be viewed as the most successful case of NPM reforms among these four countries. Ethnic diversity has not become a critical issue in either of these countries compared to Sri Lanka where the ongoing civil war since 1983 has consumed an enormous amount of human resources that otherwise would have been invested in the country.

Contrary to the previous examples, critical elements for success are missing in Sri Lanka and Bangladesh. In these countries reform initiatives

were influenced by short-term political motives, and not enough resources were invested in implementation. The collaboration between political, administrative, and business sectors into a strategic plan for change was missing. Samaratunge and others (2008) emphasize that unfunded welfarism, at times determined by partisan interests, was against the main objectives of NPM reforms. In addition, in Bangladesh the absence of political commitment and vision, weak market forces, and lack of institutional capabilities undermined the effective implementation of NPM reforms. They conclude that as a result, Bangladesh was very selective in introducing reform measures.

Privatization in both Sri Lanka and Bangladesh increased during the last decades as a result of the NPM reform initiatives in the 1980s. However, poor management of the privatization process resulted in inefficiency in resource allocation and maximization of the public interest. Samaratunge and others (2008) suggest that in both countries, privatization became a popular source of income for corruption and patronage distribution. On the other hand, Malaysia also implemented a massive privatization program that was designed to create strong market forces, making opportunities for both the Bumiputras and foreign investors. To make the privatization process effective and accountable, the Malaysian government introduced special measures to strengthen the power of the Auditor General to conduct management audits on privatized entities. Singapore used a corporatized model with public ownership and introduced hardcore anticorruption measures to improve efficiency in the corporatized sectors. This process enjoyed strong support by the country's political leadership.

According to Samaratunge and others (2008), Singapore has a strong tradition of authoritarian government that supported the reforms. Collaboration with the business community revitalized the process. Through regulatory mechanisms, Singapore has continuously improved the quality of public services. In the same direction, the Malaysian government has developed symbiotic collaboration and partnership initiatives with the business sector to support the reforms. This unique state tradition in Malaysia has created employment opportunities for underprivileged sections of the community and helped overcome ethnic differences.

Bangladesh is basically run by a politico-military bureaucratic oligarchy. This regime has developed a strong alliance with the emerging trading and business class. The regimes in Bangladesh have supported market economy principles and initiated selective reform measures. The relationship between the politico-bureaucratic-business elites has become the main cause of inefficiency, corruption, and lack of transparency and accountability.

Regulatory institutions have become dysfunctional and have failed to neutral-ize the forces against change. Sri Lanka suffered from quite similar ills, even if to a somewhat smaller extent.

All this should also be considered in view of two other factors—the dependence on foreign assistance and the role of civic society. With the support of the Asian Development Bank (ADB), Sri Lanka introduced performance measures and budgetary reforms in order to improve both efficiency and effectiveness in the public sector. However, performance-based pay and employment contracts could not be introduced due to strong resistance from senior civil servants in Sri Lanka. Bangladesh has intro-duced some performance indicators as means to employee promotion, but they could not be implemented due to its administrative culture (Samaratunge and others, 2008).

The role of civil society is more limited in Singapore and Malaysia compared with other countries in the region. The electronic and print media in both Sri Lanka and Bangladesh play a relatively significant role in public policy debate. Civil society groups in Sri Lanka and Bangladesh have reasonable access to official documents and records. They have a significant role in public policy making, which is highly restricted in Singapore and Malaysia. The level of corruption and inefficiency in the public service in Sri Lanka and Bangladesh is endemic. Public trust in government is low and provides less legitimization for reforms. Civil society groups are not yet organized in their approach to influence public management actions. The powerful groups in the polity use this as an opportunity to misuse the reform initiatives.

Hence, Samaratunge and others (2008, p. 46) summarize that each country's path to implementing NPM practices was different due to political history, party politics, macroeconomic considerations, state tradition, and the role of civil society. The most prominent influences on the process were the political commitment for change and the leadership and cultural differences amongst the countries. Singapore and Malaysia are categorized as successful cases of NPM reforms. Sri Lanka and Bangladesh are less successful, with the short-term interests of the ruling elites as a core reason.

Africa

During the last three decades, most African countries have engaged in com-prehensive public sector reform programs (Adamolekun, 1999; Kpundeh and Levy, 2004). In many cases they have received remarkable assistance from international institutions, which highlighted the diffusion of public

ideas from the Western world to less developed countries. However, despite the tremendous efforts and resources that have been allocated to this endeavor, progress remains relatively scant. Public sector management reforms are a central feature of economic policy reform programs. However, the performance of such reforms in Africa remains hindered by a myriad of factors including lack of efficiency, lack of accountability, ineffective management practices, and corruption (UN-Economic Commission for Africa, 2003).

Many African countries such as Ethiopia, Ghana, Mauritius, Senegal, and Uganda have embarked on comprehensive reforms aimed at improving the quality of life of their citizens, and creating new government machineries to establish efficient and effective management systems. However, despite the tremendous efforts and resources allocated to reforms, progress is slow and many African countries have not come close to their goal of developing and transforming their societies to the same standards as developed countries. Effective health services, education, and housing still remain out of reach for many communities. With the exception of a few successful cases (Botswana, for example), public service management remains at a lethargic stage.

Today, public sector management reforms in Africa face a number of challenges that have limited the scope, speed, and quality of services rendered. For example, corruption constitutes by far one of the biggest challenges in the public sector. Other challenges include multiple accountability, inadequate resource utilization, and institutional capacity. International Organizations such as the World Bank, the International Monetary Fund, and other advisory and humanitarian agencies recommend that African governments, therefore, need to increase their efforts to address these challenges through effective public sector reforms. According to Hope (2001), there is good reason to believe that at least some of these challenges will be met. Hope suggests that the application of NPM-type reforms in Africa, despite their mixed results, has been mostly successful. African economies have been recording positive rates of economic growth during the past few years, foreign investment is returning, and the size and costs of running government are declining.

Nonetheless, future reformers also need to keep an open mind as to cultural diversity, ethnic differences, and cultural gaps of norms and social priorities in each country. What may work and what may not is different in the south than in the north of Africa, as well as between the east and the west of the continent. Reforms must take the needs of the people into consideration, the capacities of the government to plan and implement changes,

and the overall political culture and stability of the country. While the NPM approach may not be a panacea for the problems of the public sector in Africa, a careful and selective adaptation of some elements to selected sectors may be beneficial.

Eastern Europe, Latin America, and Other Countries

NPM reforms were also implemented quite extensively in Eastern Europe (Romania, Russia, Poland, Ukraine, to name only a few) and in Latin America (Brazil, Argentina, Uruguay, Mexico, Colombia, Venezuela, and others). However, scholarly writing and systematic knowledge about it is rather scarce.

Eastern Europe: The Post-Communist Era In general, the rapid shift of ruling ideology in former Soviet Union countries and in its satellite communist states brought new managerial thinking and openness to change. Greater competition, higher level of decentralization, and more service-oriented reforms were part of the expected change that citizens had from the new regimes (Rice, 1992; Meyer-Sahling, 2004a; Verheijen and Rabrenovic, 2007). Greater freedom of speech accompanied by encouragement of civic society involvement in politics and in social actions promoted some reforms in higher education, health care, and infrastructure planning. However, the democratization process that many in the West expected (or hoped) to come disappointed, and instead of desired liberal, Western-type markets and public services, a different model was promoted—one with an authoritarian style of quasidemocratic apparatus, some say even pseudodemocratic type with an elite-hegemony sphere.

Ellison (2007) suggests that the countries of Eastern and Central Europe, and some from the former Soviet Union, are in fact transition countries because they ostensibly have populations that want open political systems and free-market economies, but at the same time are struggling to build the public institutions needed to achieve them. Other scholars agree and extend the perspective to discuss a change from post-communism to postsocialism (Rice, 1992). Transition, therefore, has become a label that denotes the disparity between desire and achievement between wanting to be like the West and being like the West (Wiarda, 2002). Those who argue that the transition would be easy suggest that political and market institutions of Western Europe and the United States could be copied in Eastern Europe (Henderson, 2003; Orenstein, 2001; Wedel, 2001). Thus, the transition from authoritarianism (such as in Latin America and Southern

Europe) could provide lessons for development in Eastern Europe. However, many transition problems persist, such as corruption, weak economic development, unacceptable wage and income disparities, and political instability.

Nonetheless, the literature on public administration reform and transition uses a comparative approach that reflects dialectical and empirical trends in our thinking about the transition in Eastern Europe (Rice, 1992; Meyer-Sahling, 2004b; Verheijen and Rabrenovic, 2007). The earliest thinking went in two directions. One direction was dominated by politicians, ideologues, consultants, and nongovernmental organizations that saw in the transition countries an opportunity to test neoliberal economic and political ideas (Wedel, 2001). However, other scholars warned that the transition would be more difficult than simply imposing Western institutions on Eastern European societies (Lampe, 1992; Moran and Prosser, 1994).

Culture (Hood, 1998), institutional inheritance (Baker, 2002), and institutional spillovers (Lane and Rohner, 2004) were also used to explain differences in reforms and compare countries' success in such transitions. The literature is dominated by a good deal of normative analysis; scholars assume that the Eastern European countries want to align with and be like the West (Wiarda, 2002). These reform movements were also highly rhetorical and were propelled with the election of conservative, antistate politicians—such as Ronald Reagan and Margaret Thatcher (Hood, 1998). Thus, by the time the transition began in the late 1980s, not only were many countries of the developed world experimenting with NPM, but the collapse of the Soviet Union served as proof for its tenets. It is important to understand that the NPM and free-market protagonists thought that their solutions to the Eastern European transition would be painful, but that the imposition of these new ways of thinking and managing would make the most of the window of opportunity of the post-communism trend (Orenstein, 2001).

Still, Wedel suggests that there is a "disconnect" between Western ideas and Eastern abilities that was "forged by the Cold War and exacerbated by the barriers of language, culture, distance, information, and semiclosed borders." (2001, pp. 2–3). According to Ellison (2007), all this would require a fundamental, culture-wide reorganization of the management of the state. Hood (1998) was able to describe the type of public management cultures that are typical of Eastern Europe. His fatalistic category, for example, fits the Eastern European experience and envisions a public management culture that is highly atomized both socially and politically—citizens do not trust the government, and they do not trust their neighbors. Public management in fatalistic cultures tends to be corrupt,

nontransparent, and capable of delivering few substantive public goods and services (Hood, 1998). Thus, public management is not effective, accountable, or responsive. For these cultures, public management reform should probably focus on building trust and civil society. As Baker notes, "Convincing the public to believe that [reform] is more than rhetoric will be a real challenge given the fundamentally different role of bureaucracy in the past and the inevitable reality that the same faces are going to be peering out over the same counters for quite some time." (2002, p. 9).

Finally, Ellison (2007) points to a short empirical study by Lane and Rohner (2004) who asked whether institutional development in transition countries goes hand-in-hand with the development of successful markets. They also asked if institutional spillover—whether the successful reform of one institution leads to the successful reform of another—accounts for more systemic success in transition countries; do countries that get one institution right have a better chance of reforming other institutions? They found that public sector institutional development is related to market performance and, perhaps more important, that focusing reforms on one institution does spill over to others. These spillovers were also more important at a more basic level of government. Thus, "institutional issues like property rights, government efficiency, corruption, regulation quality, rule of law (in the narrow sense) have a greater impact on economic outcomes than issues like macroeconomic policy and political stability" (Lane and Rohner, 2004, p. 86).

Latin America: Democratization and Economic Rise Building a new type of state is also the major consideration in Latin America. Studies that examined the state of NPM in Latin America (for instance, Nef, 2007; CLAD, 1998) mentioned that the major goal of reforms is to build a state that will be able to face the challenges of the postindustrial age. It should guarantee the performance of economic contracts while also having the strength to guarantee social rights and competitiveness of each country on the international scene. Thus, a third way is being sought between neoliberal *laissez-faire* and the former social-bureaucratic model of state intervention. However, in addition to the global reform context, substantial Latin American idiosyncrasies exist. First, the situation in which these countries found themselves upon the outbreak of the crisis in the '70s and '80s was much more serious than in the developed world. Not only did these countries face a serious fiscal crisis, but their previous economic development model (import substitution) had also proved ineffective. Moreover, external indebtedness became chronic on practically the entire continent.

A failure to solve these structural problems led, in most Latin American nations, to stagnation and high inflation throughout the '80s. Faced with this scenario, the first generation of reform prioritized the financial scope of the state crisis. Thus, market-oriented reforms, above all opening up to trade and fiscal adjustment, were the principal measures implemented in the eighties. In most cases, the major success of this first round of reform lay in the attempt to stabilize the economy vis-à-vis the threat of hyperinflation (Nef, 2007).

An examination of these first reforms shows that structural adjustment, whose ultimate objective was state downsizing, failed to resolve the set of basic problems faced in Latin American countries. For this reason, a second generation of reforms has evolved, aimed at restructuring the state and its political and administrative mechanisms. It is currently a recognized fact that the state continues to be a fundamental instrument for economic, political, and social development in any country. It may, however, have to be implemented differently from the national-development pattern adopted in most of Latin America and from the social-bureaucratic model that prevailed in the developed world during the postwar.

In the process of rebuilding the Latin American state, the greatest challenge lies in rendering changing world trends compatible with the region's specificities (Nef, 2007). In regard to structural changes aimed at having world impact, Latin America faces international economic competition that has accompanied globalization. The state (such as Brazil, Argentina, and its neighboring countries) attempts to replace its former protectionist (and in some cases tyrannical) policies with measures that make enterprises more competitive in the new international economic environment. To achieve this, a sound foreign trade policy is being employed, aimed at enhancing the countries' participation in world trade flows. In some countries, like Brazil, Argentina, and Chile, these processes are in full power during the 2000s. Likewise, public and private funding is strategically channeled to programs in the areas of education and science and technology.

Another structural trend points to the changing role of the state in the economic and social sectors. State action is aimed primarily at social areas that can guarantee universal health and education services, and at the promotion of economic development, creating instruments to guarantee microeconomic conditions that attract private investment and foster systemic competitiveness in the country, through sound policies in science and technology and foreign trade sectors. As concerns the form of intervention, however, implementation of any major change in the role of the state occurs

in the unique economic and political sphere of each country. In economic terms, rather than intervening directly as a producer, some countries already concentrate on regulatory activities. Privatization and the establishment of regulatory agencies are part of this process.

Analysis of the current state of NPM-style reforms in Latin America suggests that the state should develop its strategic capacity for joint action and collaboration with the private sector and universities in order to create an appropriate environment for increasing competitiveness among enterprises. Reforms should aim at ensuring that the new development cycles and increasing productivity are virtuous in respect to the use of natural resources, the increase in the technological base, and income distribution. This will allow to break through the vicious cycle of "poverty-making growth" that was characteristic of Latin America in the past. These structural changes, among others, can only be viable in Latin America when state reform projects take into consideration three specific major problems in the region: (1) the consolidation of democracy, (2) the necessity of resuming economic growth, and (3) reduction of social inequalities. To a great extent, it is by virtue of these three specificities that state reform in Latin America must take on new horizons entirely different from the previous, merely financial and technocratic perspectives.

Redemocratization is an important aspect of state reform in Latin America, above all because it has an impact on the dynamics and pace of the process. Many of the reforms depend upon the establishment of new institutions, constitutional changes, or profound modifications in the administrative system (for Mexico see, for example, Nef, 2007). This will affect the status quo of various groups, some of which have been entrenched for decades in the state structure. This dilemma will be especially evident when the transition is made from the first generation of reform, carried out by a small group of bureaucrats and technocrats isolated within the state, to the next generation, which requires the attainment of democratic coalitions to sustain the state reform process. The new stage of reform must be approved by political systems that arose toward the end of the authoritarian cycle but were mostly unable to immediately consolidate democracy. The fact is that Latin American politics is still marked by a combination of weak parties, patronage, corporatism, and personality leadership. Notwithstanding this, the lessons learned in Latin American countries with respect to the nefarious nature of dictatorial regimes give strength to the notion that it will not suffice to approve state reforms. They must be implemented in a democratic context, either by improving existing political institutions or by creating new ones (CLAD, 1998).

Besides democratization, Latin American state reform is affected by questions relating to economic development and social inequalities. The state structure must not only put in place the conditions for sustainable economic development, but also guarantee the financial and administrative resources necessary for reducing poverty and the serious social inequalities that exist in the region. In regard to the latter, it should be remembered that one out of every three Latin Americans lives in poverty and that the level of inequality in 15 of the 17 Latin American countries is greater than would be expected, given the degree of development achieved in these nations.

If the ongoing state reform project does not resolve these specific Latin American problems, the state will lose social legitimacy in the short term. The reforms implemented thus far have mostly solved the matter of economic stabilization, and to some extent gained political balance. Development has not been firmly resumed, income concentration has not been reverted, and greater democracy has yet to become consolidated.

The "Dinosaur Syndrome" and the Comparative Movement: A Midrange Comment

For many citizens in all of the above mentioned countries and in others, public administration carries the image of a slow and heavy dinosaur that can't keep up with necessary transformations of the modern era (Vigoda, 2002b). Some call for higher responsiveness of the dinosaur in view of its proven capacity to address major societal changes (Ibid; see Chapters 3 and 4), even when acknowledging its heavy mass and complicated structure. Others have less faith in the wisdom of the dinosaur-like body of government. They challenge governmental agencies' rationale and tend to believe that they are too conservative and demonstrate little flexibility, slow adaptation to change, lack of innovation, and almost no entrepreneurship.

Such an image is widespread not only among scholars but also among ordinary citizens. Citizens of Western and developing nations alike are highly critical and skeptical as to potential improvements in this field, and some even believe that the public sector, like dinosaurs, needs to shrink and diminish, if not disappear entirely, in favor of a free market. These perceptions were even stronger in the late 1900s and early 2000s, and have weakened somewhat since the 9/11 events and several subsequent economic failures in the 2000s (the high-tech bubble crisis in 2002, the real-estate crisis in 2005, the bank and finance crisis in 2008, and the current, and ongoing, European/American deficit crises).

Yet, like the progress of any heavy creature, the dinosaur of the public sector may be perceived as moving forward at a snail's pace, but slowly, unevenly, yet constantly, and with great potential for improvement, it does make progress. One way this progress is becoming possible is its learning from similar and different cases around the globe and by comparing current situations to past experiences. The globalization process, the growing trend of open market exposure, high technology that builds communication channels between people at different ends of the world, and rising spiritual and virtual tradeoffs between nations further complicate the picture. Transfer of merchandise, goods, and services is growing and creates much stronger interdependence between countries in economics and finance. The virtual world and new developments of media and communication applications allow more information and data to move between consumers and offers much more to compare. Technology allows a rapid accumulation of such data but in the same time also allows a much more sophisticated avenue for analyzing and understanding this data. Furthermore, citizens of the world are becoming much more knowledgeable compared with any time in the past. It is not infrequent that a patient who uses public health services is at times more aware of options for treatment and risk effects than their physician. Parents can choose today between many more alternatives for education of their children compared with the past. And residents of cities expect local government to become innovative and creative to elevate the quality of life in communities. Policy makers and public servants are expected to apply new methods and novel tools used at the other side of the world and proved useful for making people's lives better, in health, education, and communities. This is all thanks to the growing sharing of knowledge and experience that modern technology and communication allows.

Hence, the decolonialization process in Africa and Asia between the 1940s and the 1960s, the disengagement of the Soviet Union in the late 1980s, the rebirth of many new nations in Europe soon after, and the Arab Spring of the 2000s are all linked together. They all allowed for the flow of ideas in a virtual world where people are only separated by geographical borders. They also reflect the growing impact of public policies (sometimes also the *lack* of such policies) of one country on its neighbors. Consequently, a comparative study of public administration is incomplete unless such global trends and dynamics are carefully analyzed and added to the puzzle. Why does such interdependence develop? When and how we should witness the transfer of ideas, ideologies, and public policies? What conditions permit better application of these policies? We attempt to clarify these

questions in the next section. We suggest a discussion of some aspects of the comparative approach under the globalization process with an emphasis on the learning mechanisms borrowed and emulated from one country to another, in a world without communication borders.

The Organization and Management of Global Policy and Public Administration[1]

The world is transforming its management and policy learning in view of massive globalization. Cross-cultural and cross-national management learning, policy transfers, and diffusion are reshaping the way public policy is formulated, expressed, and implemented. The democratic world, on its way to change and reforms, is struggling with many problems typical to an open society and free transfer of knowledge, but other countries, as will be demonstrated hereafter, are struggling with quite similar issues as well. In the non-Western world comparable reforms are pursued under a mix of coerced and voluntary imitation, especially when reforms are a condition for development aid (Raadschelders and Bemelmans-Videc, 2007, pp. 281–284).

Dolowitz (2006) suggests that the state and the process of globalization takes issue with the arguments on the decline of the state, and suggests that the growth of policy transfers opens and not only constrains the policy options of the state. Dolowitz, one of the pioneers of the policy transfer literature (Dolowitz and Marsh, 1996; 2000; Rose, 1993), suggests that there are at least three good reasons to use the state level analyses in the study of policy transfer and globalization. First, it is clear that the nation-state has continued to be an important, if not the predominant, entity in international governance. Second, few within the globalization debate acknowledge, let alone discuss, the importance of the state for the very development and survival of "globalization." Finally, few have discussed the processes inherent in globalization in light of the fact that any state can utilize these processes to strengthen its own position in relation

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[1] This section is partly based on D. Levi–Faur and E. Vigoda–Gadot, "The international transfer and diffusion of policy and management innovations: Some characteristics of a new order in the making," in D. Levi–Faur and E. Vigoda-Gadot, Eds., *International Public Policy and Management: Policy Learning Beyond Regional, Cultural, and Political Boundaries* (New York: Marcel Dekker, 2004), and "New public policy, new policy transfers: Some characteristics of a new order in the making," *International Journal of Public Administration* (2006).

to domestic and international governance. Thus, we maintain that the state is still the only actor that can make binding decisions on behalf of the citizenry at large; it is also the only actor that has the authority to exercise regulatory oversight over market functions, within a specific nation and also internationally vis-à-vis its relative power and influence in the international system.

Globalization in this formulation is an opportunity to learn from other political systems. Thus, comparative approaches enrich the managerial understanding of how to run our states effectively and build better policies. The learning process, accumulated through comparative enrichment, comprises many segments. The segments of the comparative voyage build mainly on the transfer of knowledge, diffusion of ideas, and emulation, changing the old order. Comparing the management of the states means learning from each other. States can learn from each other in order to (a) enhance or reduce the international effects of globalization; (b) expand or reduce the impact of globalization on individual political systems; (c) use the rhetoric of globalization to justify actions based on "foreign" actions and ideas; (d) utilize institutions such as the EU to harness the forces of globalization to their advantage; and (e) use international governing bodies (such as the EU) to limit the impact of globalization. Restricting policy transfer, Dolowitz suggests, is to restrict globalization. To facilitate policy transfer is to facilitate globalization. What we should place on the research agenda are questions of how to govern transfer so as to maximize the social benefits. Embedded in Dolowitz's analysis is the supposition that the policy process is governed, or at least can be governed, and that states, at least some of them, are the most important actors in this process.

Robert Christensen (2006) focuses on international nongovernmental organizations (INGOs) such as the World Bank or the Organization for Economic Cooperation and Development (OECD), as means for comparison and understanding of the global and managerial-administrative-policy change. Although not sovereign entities, INGOs possess a vast potential to influence international, national, and local policy, and they have demonstrated that potential in many instances. The most recent decades have witnessed remarkable growth in the numbers of these organizations, with nearly one-sixth of today's approximately 37,000 INGOs being formed in the 1990s. Possibly more significant than the expanding number of these organizations, he presents a datum that indicates that where nongovernmental organizations handled $1 billion in world development funds in 1970, by 1997 these organizations were handling more than $7 billion. The proliferation of these organizations, he suggests, raises the question of

whether they are most appropriately placed in or outside the traditional worldview that recognizes nation-states as the primary and legitimate institutions of global policy making (the "Westphalia paradigm," in his terminology). As an alternative to this dominant perspective he suggests that of "global society" (or "transnational society" or "world community"). This emerging perspective refers to "a society of State actors and non-State actors like NGOs, multinational corporations, and individuals on a global scale, which is characterized by a multitude of decentralized lawmaking processes in various sectors, independent of nation-states." (Nowrot, 1999, p. 641). Christensen moves on to suggest some ways in which the two perspectives can be evaluated. While in his focus on INGOS he differs from Dolowitz, and while he contends that the state's policy-making ability is being redefined and characterized by nonsovereign entities, he does not go as far as to dismiss the importance of state actors in policy transfer. What both he and Dolowitz share is a recognition that both actors are important for comparative use, and even more notably that policy transfers by both state and nonstate actors are important enough to become a major focus for students who are interested in comparative views of social, political, and economic change.

Summary

It seems that in the study of public administration, boundaries are created between traditional administration (that emphasized the legal perspective), management studies (the business angle), and policy studies (including emphasis on the political element in public sector activities). Perhaps these distinctions are useful for analytical reasons, but at least one author suggested that to distinguish public management and public policy programs from "traditional" public administration is merely a marketing tool masking that old wine is sold in new bottles (Raadschelders, 2011b, p. 208) More important, the distinctions academics make between administration, management, and policy have little meaning in the practitioner world. They are highly intertwined activities. In this chapter we focused on organization and management, but had to pay some attention to the mechanics of policy making in relation to management. Substantive public policy areas will be the subject matter of Chapters 9 to 12.

CHAPTER EIGHT

BUREAUCRACY AS PERSONNEL SYSTEM AND POLITICAL-ADMINISTRATIVE RELATIONS

In Chapter 6 we made the case that for most of history bureaucracy was the instrument that supported those in power; seldom did mandarin-bureaucrats work for the people. We argued that in some parts of the world this has changed in the past 200 years or so. Bureaucracies have shown they can work for the people while supporting the political leadership elected into office. Bureaucracy is the most efficient of the organizational structures we know, but that does not mean that it adequately constrains the potential for maladministration by individuals (Tiihonen, 2003). Bureaucracies are networks of people, and not everyone is reliable, competent, citizen oriented, collegial, and altruistic. Every bureaucratic organization will have some incompetent, self-oriented, unreliable, and even corrupt employees (see also Chapter 6). Plenty of evidence for this can be found worldwide in public organizations, in multinational corporations, businesses, churches, sports associations, scouting troops, and so forth. This is not specific to bureaucratic organization, even though some have argued that it dehumanizes people (for instance, Merton, 1940; Hummel, 1977). Corruption, maladministration, selfishness, and so forth are simply part of the human condition. However, the extent to which bureaucracies can be used for selfish purposes varies greatly from country to country, and it seems especially to depend upon whether it is embedded in a pluralistic democratic system. The chance that bureaucracy can and will be used for evil or

for purposes of exploitation are most limited in the polyarchal competitive system described in Chapter 5. In the other party-prominent systems the chances are greater that bureaucracy serves those in power, while they are greatest in bureaucratic-prominent regimes. This is best illustrated by looking at the corruption index that is published annually by Transaction International (Section 1). States can move from being extractive to becoming a service delivery state when the criteria for employment in its organizations and agencies are professional rather than personal. Thus we will discuss bureaucracy as a personnel system by means of Weber's ideal type (Section 2; the part of this ideal type that concerns bureaucracy as organization has been discussed in Chapter 6). It is important to understand that Weber's formal definition of bureaucracy as a personnel system regards public servants from a juridical perspective. However, several types of civil servants can be distinguished when applying a more sociological perspective (Section 3). Next we will look at the personnel size of the civil service, both in terms of its absolute numbers and as a percentage of the workforce (Section 4). Career civil servants by far outnumber political officeholders, but we already noted in Chapter 6 that in pluralist democracies this has not proven to be a problem. A professional civil service system is somewhat autonomous from the political leadership, and that requires attention for political-administrative relations and for the role career civil servants play in advising political officeholders (Section 5). Earlier we described momentous changes in the superstructure of governments from the late eighteenth century on (Chapter 3), and in this chapter we will discuss how those changes influenced the development of personnel management in the Western world (Section 6). In the conclusion we will briefly reflect on the importance of career civil servants for policy making and implementation.

The Importance of the Personnel Function for Responsive Government

In a way bureaucracies are abstractions because we cannot really "see" them. The behavior of public servants, though, is significantly shaped by the institutional arrangements in which they are embedded. Indeed, while the big donor countries focused their development aid initially on the development of infrastructure and heavy industry (1950s and 1960s), then on providing basic needs (1970s and 1980s), they finally considered institutional development to be the most important factor in the effort to enhance

a country's overall economic prosperity. Bi- and multilateral donors increasingly demand administrative reforms, and one of these concerns the human resource function. How do governments across the globe compare when it comes to the professionalism of their bureaucracies? There is quite a bit of research available into recent developments in civil service systems in Africa (Adamolekun, 2007), Anglo-American countries (Halligan, 2004), Asia (Burns and Bowornwathana, 2001), Central and Eastern Europe (Verheijen, 1999), and Western Europe (Van der Meer, 2011). One of the important features where governments significantly differ is the extent to which its public officials are perceived as corrupt. Since 1995 the Berlin-based nongovernmental organization Transparency International annually publishes a corruption perception index. This index suffers from many methodological problems, but for lack of alternative data we used it. No country is corruption free. Corruption is measured on a scale from 0 (highly corrupt) to 100 (not corrupt) and is based on expert opinion. Denmark, New Zealand, and Finland are ranked first with a corruption index of 90. All developed industrial countries are much less corrupt than developing countries. Somalia is ranked one hundred seventy-fourth with a corruption index of 8. In Table 8.1 the corruption ranks and indices are provided for the 32 countries of which a policy area is discussed in Chapters 9 to 12.

Both the market and the state influence the social order, and in the effort to establish a more just society, a balance must be struck between the two. To what extent should societies rely on the self-regulating control of the market? The answer to that question determines the extent to which the state is needed to intervene and correct some of the inequalities and externalities that are created by the market. We noted in Chapters 2 and 3 that state intervention for most of history was very limited, that states and their governments were small in comparison to today in terms of personnel size, and that they did not really provide many services for their subjects. Today's welfare states offer a wide range of services to citizens, and these are not enough as demands and expectations keep rising; public bureaucracies are no longer only exploitative and extractive. Based on the World Values Survey, Patrick Flavin and others (2011) investigated the relationship between size of the state (as measured in tax revenue as percentage of gross domestic product [GDP]; government consumption of GDP; unemployment benefits; and social welfare expenditures as a percentage of GDP) and self-reported life satisfaction. They focused on 15 industrialized democracies (Australia, Canada, Finland, France, Germany, Great Britain, Italy, Japan, the Netherlands, Norway, South Korea, Spain, Sweden, Switzerland, and the United States) and found a

TABLE 8.1. THE CORRUPTION PERCEPTION INDEXES 2012

	Rank	Score
Argentina	102	35
Australia	7	85
Belgium	16	75
Brazil	69	43
Canada	9	84
Chile	20	72
China	80	39
Colombia	94	36
Czech Republic	54	49
Denmark	1	90
Estonia	32	64
France	22	71
Germany	13	79
Greece	94	36
India	94	36
Iran	133	28
Israel	39	60
Japan	17	74
Mexico	105	34
Morocco	88	37
Netherlands	9	84
New Zealand	1	90
Poland	41	58
Romania	66	44
Russia	133	28
Singapore	5	87
South Africa	69	43
Spain	30	65
Sweden	4	88
United Kingdom	17	74
United States	19	73
Zimbabwe	163	20

Source: Transparency International.

strong positive relationship between state intervention in the economy and subjective well-being, and that was not limited to those of whom one can expect that they are more affected such as lower-income and lower-status citizens and pro-state liberal-left citizens (for non-American readers: Liberal in the United States refers to the left of the political spectrum, while in Europe it refers to the right of the political spectrum). In general, state interventions that compensate for market deficiencies appear to produce greater levels of human happiness (Flavin and others, 2011, p. 264).

Obviously, leaders of less-than-democratic political systems intervene in society as well, but their bureaucracies operate like the premodern bureaucracies upon which the stereotype of bureaucracy is based that we described in Chapter 6. A modern civil service system assures professionalism and is able to deal with instances of corruption.

Defining Bureaucracy as Personnel System: Max Weber's Juridical Perspective

Wherever organizations are populated by people on the basis of kinship and friendship, and where public office can be inherited, traded, or even sold, the chances that the organization is used for personal rather than public interests are substantial. We cannot point out enough how momentous the changes in the structure and functioning of governments were during the 1780–1820 period. Next to the separation of church and state, of politics and administration, and of collegial and bureaucratic administration, the changes relevant to the topic of this chapter concern the separation of office and officeholder, and a new basis for the relationship between elected and appointed officeholders. Indeed, so different was the nineteenth century career civil servant from his historical predecessor (the mandarin-bureaucrat) that as early as the 1820s W.F. Hegel noted that career civil servants were the new guardians of democracy, indispensable to democratization (1991). It is their professionalism and expertise upon which elected officeholders rely when outlining policy. In fact, more often than not elected officeholders will adopt policy formulations developed by career civil servants.

Hegel captures the new role of civil servants vis-à-vis political officeholders as one that is actively developing and advising about policy. He trusts career civil servants, and his is a sociological perspective that concerns how career civil servants can and should function in the real world. This contrasts sharply with Weber's formal and juridical definition of

bureaucracy as a personnel system (seen in the following list). Befitting the principle of a clear division of labor, the first dimension is a departure from historical practice where one office could be held by multiple people (for instance, in a collegial organization), and this is still the case with any of the political institutions (especially legislatures; often also judiciaries). Dimensions 10 to 13 identify the nature of their relationship with elected officeholders and the reasons why someone should be appointed in a career position. Especially dimension 12 should serve as a safeguard against nepotism. Dimensions 14 to 20 concern the work conditions: Civil servants are protected from the vicissitudes of working in a political environment to which career officeholders are subjected in exchange for their loyal support of whichever political party (or parties in a coalition) is in power. As mentioned before, this is a definition of bureaucracy that fits a polyarchical and democratic system of government. It is also a definition that does not differentiate between rank or status: A municipal employee collecting garbage is as much a career civil servant as a director-general in a national government department.

Bureaucracy as a Personnel System[1]

9. Office held by individual functionaries,
10. who are subordinate, and
11. appointed, and
12. knowledgeable, who have expertise, and are
13. assigned by contractual agreement
14. in a tenured (secure) position, and
15. who fulfill their office as their main or only job, and
16. work in a career system, are
17. rewarded with a regular salary and pension in money,
18. rewarded according to rank, and
19. promoted according seniority, and
20. work under formal protection of their office.

Weber's contemporaries on both sides of the Atlantic noticed that the role and position of governments were changing in response to rapid changes in the social environment (industrialization, urbanization, population growth). How to evaluate these changes was difficult since there was no historical precedent. This ambiguity in the assessment of bureaucracy

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[1] Van Braam 1986, 216–220; Raadschelders and Rutgers 1996, p. 92; nota bene: The first eight dimensions were listed in Chapter 6.

and of bureaucratization is visible in the words of the (German-born) American journalist H.L. Mencken. On the one hand, he was very much aware of the harm that spoils and nepotism in the public sector had done to American society, and he favored a rational, efficient, and honest government. He also clearly distinguished the historical from the modern bureaucracy: "The extortions and oppressions of government [. . .] will come to an end when the victims begin to differentiate clearly between government as a necessary device for maintaining order in the world and government as a device for maintaining the authority and prosperity of predatory rascals and swindlers." (quoted in Nolte, 1968, p. 118) At the same time, on the other hand, he was weary of the "reach" of government, noticing how "government has now gone far beyond anything ever dreamed of in Jefferson's day. It has taken on a vast mass of new duties and responsibilities; it has spread out its powers until they penetrate to every act of the citizen, however secret; it has begun to throw around its operations with the high dignity and impeccability of a state religion; its agents become a separate and superior caste." (quoted in DuBasky, 1990, p. 377)

A century after Mencken wrote this, governments in industrialized, developed countries have grown to an extent that even Mencken could not have dreamed of, but have its "agents" become a separate and superior caste? The answer possibly depends upon national culture. While Weber defines bureaucracy in a manner that allows for comparison to existing bureaucratic organizations, he was well aware of the fact that the functioning of bureaucracy was embedded in and constrained by national traditions and culture (Widner, 2007). American culture is one where civil servants do not enjoy high social status, suspicious as Americans are of anything that reeks of big government (Wills, 1999). In France, Germany, and in the Scandinavian countries civil servants are highly regarded, especially those employed at the national level. Historically, Chinese mandarins enjoyed high social status because it took many years to complete the studies required for such positions. Germany and France were the two countries where the first university-level professorships, curricula, and handbooks emerged in the seventeenth and eighteenth centuries, respectively.

Categories of Public Servants in a Sociological Perspective

In a legal or juridical perspective anyone appointed in a public sector position with a career track is a *civil servant,* from the garbage man to the director-general. In a sociological perspective, though, there are different categories

of public officials, and the better concept to capture all of them is that of *public servant.* There are two main groups of public servants. On the one hand there are elected officeholders, political appointees, and citizen officeholders; on the other hand there are career civil servants of which there are several types. In this section we will discuss the various types of public servants and provide information about their changing size over time (in the next section we will compare present sizes of civil service systems across the globe). The types of public servants and their changing size over time are drawn from Raadschelders's (1994a) work on changing size and composition of the workforce in four Dutch municipalities between the years 1600 and 1980. Obviously, we have to be careful about making generalized statements regarding size and composition of the civil service over time when it is based on research limited to four Dutch municipalities. However, there are no data elsewhere as far as we know, and we do think that some statements can be made that people in most countries will recognize.

Political officeholders are generally elected into public office. That is especially the case with legislators at the national, regional, and local levels. Executive officials at these levels of government are generally elected as well (president, governor, mayor). In many countries around the world the number of people elected into public office is generally limited to the top political positions. As far as we know, the United States is an exception because a variety of public officials at state and local levels are elected rather than appointed (for instance, state superintendent for education, secretary of state, attorney general, county commissioners, sheriffs, coroners, judges, and so forth). This reflects the American distrust of "unelected bureaucrats." Political officeholders used to be a substantial category of public servants, almost 25 percent of the total public workforce in the year 1600 in those four Dutch towns. We suspect that those who we nowadays would label as political officeholders constituted a sizeable percentage of public servants anywhere in the premodern world, simply because the number of people employed in a position that we today would characterize as career civil service was very small. We find the same in the early United States (White, 1965, p. 256). Today, in most developed countries political officeholders occupy between 1 and 2.5 percent of public sector positions (for the United States see Milakovich and Gordon, 2004, p. 19).

The second category of public servants is those who are neither elected nor appointed to a career position, and there are two subtypes of them. First, *political appointees* who serve at the pleasure of elected officeholders. The best-known example in the world is that of the American president who has the authority to appoint individuals to high-level positions in federal departments

and agencies (and for some of these, congressional approval is required). We have no comparative data on the size of political appointees over time. Prior to the modern era we assume that the number of political-appointee (or patronage) positions was substantial (certainly in the United States, see Raadschelders and Lee, 2005), simply because those who acquired government jobs were often somehow related to those who had the authority to give out jobs. There are political-appointee positions in many countries, but there are clear differences. First, there is a substantial difference between developed and developing countries. In the former the number of political appointees is generally limited to the top levels in public organizations, but there is interesting variation. The United States has probably more political appointees than any of the other developed countries; at the federal level alone there are at least 7,300 (and of these 10 percent are recruited from among the Senior Executive Service; see Stillman, 2004, p. 131). There are hardly any purely political appointments in Germany. In France this type of position is limited to ministerial advisers, but their numbers are constrained by budget. Hence, and except for the United States, most appointments in the career civil service are merit based. In many developing countries political affiliation (as well as kinship and friendship) is still the primary selection criterion for positions in public organizations, but the trend is toward a system based on merit (World Bank, 2013).

The second subtype of nonelected and noncareer civil service officials are *citizen functionaries* who work in government but on a voluntary basis and without salary. Examples include citizens who serve on boards and advisory committees, and many of those can be found at the local level (for instance, library board, planning and zoning board, parks and recreation board, and so on). We suspect these have been very important in premodern government. In the four Dutch municipalities, they constituted 18 to 29 percent of the public workforce between 1600 and 1950. After that, their numbers declined, to disappear pretty much in the 1960s. As far as we know, there has been little research on the role and size of citizen functionaries in other countries. From unpublished research Raadschelders did in the city of Norman, Oklahoma, we know that citizen functionaries constituted about 25 percent of the local workforce around the year 2000. At the local level, citizen functionaries may become more important again, as Bovaird and others report for various countries (2014). We can find citizen functionaries also at regional and national levels of government, for instance as members of special advisory committees to the executive.

The second main group of public servants is that of *career civil servants.* They include anyone who works for a salary and is appointed on the basis of

merit (that is, a combination of educational background and practical experience), and there are five subtypes. The first is that of *administrative officials* or *civil servants* in a sociological sense. They are the white-collar workers who help to develop and implement policy and who draft regulations, ordinances, and laws. They are desk workers and include managers and supervisors as well as clerical and administrative support personnel. Their work mainly requires intellectual capacity and very little physical effort. Before the modern era there were not many civil servants: in the four Dutch municipalities less than 6 percent of the total public workforce in 1600. However, by 1980 they amounted to more than 30 percent of the local workforce. At national-government levels this subcategory of civil servants has grown even faster and by far dominates those in elected or politically appointed positions, and this is mainly because national governments have decentralized, contracted out, and even privatized various tasks and services that require physical, manual effort. The extent varies from country to country, but there is a worldwide trend of bureaucratization; that is, national public organizations are becoming more and more truly knowledge-based organizations with predominantly white-collar workers. This is less strong a tendency at the local level because local government provides a range of services that require laborers (see later).

The second subtype of career civil servant is that of *technical and professional personnel.* They usually occupy lower-ranking positions and wear a uniform so that the line of authority is clear and cannot be disputed. In fact, in most countries where public sector jobs involve the possibility of physical harm or even death, the workforce is uniformed. Examples include police, correctional, firefighting, and military personnel. Their jobs are a mixture of intellectual and physical labor. Higher-ranking officials in these types of organizations are really civil servants, desk workers, even though they are uniformed (for instance, police chief, fire chief, general officer). Relying upon their numbers over time in the four Dutch municipalities, in relative terms this subcategory of career civil servants has declined, but in absolute numbers they have actually increased. This is a function of the fact that this type of work belongs to traditional public services that concern the protection of the territory and the maintenance of public order and safety.

The *laborer* or *blue-collar worker* is the third type of career civil servant, and they perform tasks that mainly require manual, physical labor. Their numbers used to be substantial (more than 27 percent in 1600 in the four Dutch municipalities), and they included street sweepers, market personnel, cleaning personnel, and (in the nineteenth and twentieth

centuries) also laborers in public gas and electricity factories, laborers in public works and in the parks and recreation departments, and mechanics (for the maintenance of a fleet of cars). In developed countries their numbers have declined in both absolute as well as in relative terms, and especially at the national and regional levels because of technological changes that made certain jobs obsolete as well as because of contracting out and privatization. At local levels blue-collar workers can still be found, then, for instance, in parks and recreation departments, the local sanitation departments (for garbage collection, among other things), and local water plants. In developing countries their numbers can be significantly higher. For instance, 80 to 86 percent of local personnel in Tunisia are characterized as blue collar, while this ranges from 52 to 57 percent in Morocco. White-collar workers comprise 7 percent (Tunisia) and 27 percent (Morocco) of local public personnel (UCLG, 2008). These data can be found in country profiles that have been compiled upon the initiative of the World Bank and an international forum organization called United Cities and Local Governments (UCLG). They provide country profiles of many countries on all continents, but the information on size and composition of the local public workforce varies a great deal.

Uniformed medical personnel is the fourth subcategory of career civil servants. We suspect that their numbers have always been below 10 percent of the workforce. In the four Dutch municipalities during almost four centuries it was not more than 5 percent of the workforce; in the United States in 2001 health care professionals amount to 8.3 percent of the total public workforce at federal, state, and local levels combined (U.S. Census Bureau, 2003, Table 468, p. 312). We can distinguish from white-collar workers since their work not only requires extensive education but is also very physical by nature (consider nurses lifting patients; surgeons in the operating theater for hours). It is the level of education that separates them also from professional and technical personnel as well as from blue-collar workers as defined above.

The final subcategory of career civil servants is that of *educational personnel.* As a percentage of the public workforce their numbers were small in premodern times, but they have grown rapidly from the nineteenth century on. In the four Dutch municipalities in 1980 more than a quarter of all public personnel worked in education. The size of the educational workforce varies quite significantly from country to country. For instance, in the Netherlands about half of all educational personnel work in private (denominational) schools. In the United States and Israel, on the other

hand, almost 90 percent of all educational personnel work in the public sector. Out of a total of more than 21 million public servants in the United States, 9.9 million are in education and almost three-quarters work in kindergarten, elementary, and secondary education (U.S. Census Bureau, 2003, Table 438, p. 280).

In the developed countries many of these career civil servants have frequent contact with citizens and can then be called *street-level bureaucrats* (Lipsky, 1980), and they amount to about 70 percent of the public work-force. The other 30 percent can be called *policy bureaucrats,* for they are the designers of policy and the writers of anything that has the rule of law (Page and Jenkins, 2005). The size and composition of the public workforce will vary with level of government and with the range of publicly provided services. In many decentralized, developed countries local government is truly big government since most public sector personnel are employed at that level. Also, most decentralized and developed countries offer a wide range of services, well beyond the traditional services that governments provided since antiquity. It is to the size of government in the present age that we now turn.

Variation in the Size of the Civil Service

In absolute terms public sector personnel size has grown enormously in the twentieth century.

This is both a function of urbanization as well as of governments meeting increasing citizen demand for services. In Table 8.2 the total public sector size (local up to national level) is provided in absolute

TABLE 8.2. TOTAL EMPLOYMENT IN THE GENERAL GOVERNMENT SECTOR: ABSOLUTE SIZE AND AS PERCENTAGE OF THE TOTAL LABOR FORCE

	Employment in Public Sector (Thousands)	As a Percentage of the Total Workforce
Argentina	2,550.1 (2009)	17.06
Australia	1,688 (2009)	18.2
Belgium	1,020.6 (2010)	22.7

TABLE 8.2 (*CONTINUED*)

	Employment in Public Sector (Thousands)	As a Percentage of the Total Workforce
Brazil	10,884.8 (2007)	12
Canada	3,511.1 (2010)	20.6
Chile	727.1 (2010)	9.9
China	n.a.	n.a.
Colombia	806.6 (2010)	4.2
Czech Republic	1,698.2 (2008)	34
Denmark	925.6 (2008)	32.4
Estonia	157.7 (2010)	27.6
France	5,132.4 (2010)	20
Germany	5,840 (2008)	15
Greece	989.2 (2010)	22.3
India	18,006.6 (2001)	n.a.
Iran	3,898.9 (2007)	18.5
Israel	482.6 (2008)	17.4
Japan	4,900 (2010)	7.8
Mexico	5,500 (2010)	12.1
Morocco	888.3 (2010)	8.4
Netherlands	1,780.4 (2005)	22.4
New Zealand	271.2 (2008)	12.4
Poland	11,748.4 (2010)	73.6
Romania	1,647.7 (2010)	17.8
Russia	117.6 (2008)	29.7
Singapore	2,074 (2010)	6.3
South Africa	2,072 (2010)	15.9
Spain	3,129.6 (2010)	17
Sweden	1,267.4 (2007)	27.9
United Kingdom	7,264.3 (2010)	25.1
United States	22,509 (2008)	15.5
Zimbabwe	n.a.	n.a.

Sources: http://www.ilo.org/ilostat/faces/home/statisticaldata?_adf.ctrl-state=wh9errv3_785& clean=true&_afrLoop=567354599777666; and http://laborsta.ilo.org/default.html.

numbers and as a percentage of the total labor force for 30 of the 32 countries of which a policy is discussed in Chapters 9 to 12. There is clearly variation. With more than 32 percent of the total labor force, Denmark has the most sizeable, while Colombia with only 4.2 percent has the smallest public-sector personnel size. In an Organization for Economic Cooperation and Development (OECD) publication the four Nordic countries have the largest public sectors (OECD, 2011) with Finland at about 25 percent and Norway at 30 percent.

While Table 8.2 provides information about public sector personnel size at all government levels, we can get some idea of the variation across levels of government. The data in Table 8.3 are 15 years old (at the time of writing this chapter) and concern only the European Union with 15 members back then. We can see that in the countries occupied by the Roman Empire (see Chapters 2 and 3) the national and regional government levels are important (France) or even far more important (Greece, Italy, Portugal, Spain). In the Nordic countries, Germany, the Netherlands, and the United Kingdom, local government is clearly an important hub of service delivery. The figure that stands out most, though, is that of the category of "other" personnel that accounts for almost half of all public personnel in the 15 EU countries. In the article from which these data are drawn, the author (Polet, 1998) does not provide an explanation for the significant variation between countries with regard to this category. In Table 8.4 we have translated the numbers of Table 8.3 into percentages, making it easier to see the differences between countries.

In a more recent OECD publication Elsa Pilichowski and Edouard Turkisch provide insight in the proportion of government employment at the federal/national level in comparison to the subnational levels (2008, pp. 26–28). Again, we can see significant variation, with Australia having about 12 percent of all public sector employees at the federal/national level, while Turkey has almost 90 percent at the national level. The United States is around 14 percent, while the Netherlands appears to be at 27 percent. That last number is higher than what is provided in Table 8.2, but we must keep in mind that data are collected according to different rationales. For instance, the data in the OECD 2008 study refer to "General Government" and include not only the core ministries, departments, and agencies but also personnel at publicly owned hospitals, public schools, social security organizations, and so forth. Hence, while it is difficult to collect truly comparative data on public sector personnel size, we do get a sense of the variation across the globe.

TABLE 8.3. PUBLIC SECTOR PERSONNEL SIZE IN THE EUROPEAN UNION: ABSOLUTE NUMBERS (1998)

| Country | Level of Government | | | | Other | Total |
	National	Regional	Intermediary	Local		
Austria	47,494	53,170		79,193	248,164	428,021
Belgium	86,934	78,433	15,481	198,235	370,802	749,885
Britain	663,950			1,031,000	1,369,823	3,064,773
Denmark	43,373		126,524	384,644	46,660	601,201
Finland	58,718			178,140	279,899	516,757
France	811,485		193,333	1,077,266	2,366,424	4,448,508
Germany	158,086	722,436		1,324,241	2,163,060	4,367,823
Greece	239,251			42,814	385,076	667,141
Ireland	35,863			26,800	151,126	213,789
Italy	495,284	96,062	92,338	510,337	2,339,443	3,533,464
Luxembourg	7,919			3,709	7,536	19.164
Netherlands	87,533		20,213	173,470	416,827	698,043
Portugal	285,267			90,864	255,480	631,611
Spain	277,830	601,327		371,456	542,668	1,793,281
Sweden	112,904		104,000	456,000	372,545	1,045,449
Total	3,411,890	1,551,428	551,889	5,948,169	11,315,535	22,778,911

Source: Polet (1998), p. 7. Legend: "regional" refers to the level between national and provincial government; "other" includes personnel in the military, police, schools, hospitals, prisons, and seasonal laborers (especially in the wintertime).

TABLE 8.4. PUBLIC SECTOR PERSONNEL SIZE IN THE EUROPEAN UNION AS A PERCENTAGE OF THE TOTAL PUBLIC WORKFORCE (1998)

Country	Level of Government				
	National	Regional	Intermediary	Local	Other
B – Belgium	11.6	10.5	2.1	26.4	49.4
DK – Denmark	7.2		21	64	7.8
D – Germany	3.6	16.5		30.3	49.5
GR – Greece	35.8			6.4	57.7
E – Spain	15.5	33.5		20.7	30.3
F – France	18.2		4.3	24.2	53.2
IRL – Ireland	16.8			12.5	70.7
I – Italy	14	2.7	2.6	14.4	66.2
L – Luxembourg	41.3			19.4	39.3
NL – Netherlands	12.5		2.9	24.9	59.7
A – Austria	11.1	12.4		18.5	58
P – Portugal	45.2			14.4	40.4
SF – Finland	11.4			34.5	54.1
S – Sweden	10.8		9.9	43.6	35.6
UK – Britain	21.7			33.6	44.7
Total	15	6.8	2.4	26.1	49.7

Source: Table 8.3.

Political-Administrative Relations: Intertwinement, Politicization, and Consultation

The size and composition of the public sector workforce is in no way comparable to that of 150 years ago, and certainly not to that of the early modern period. Earlier we referenced some data concerning local government personnel in four Dutch municipalities for a period of 380 years. We also know that on New Year's Eve of 1789 the U.S. Treasury Department had a total of 39 employees, but it is not clear how many of these were political appointees and how many occupied a career civil service position (White, 1965, p. 256). As the demand for public services increased in the second half

of the nineteenth century, so did the demand for professionally trained personnel. After all, elected officials were no longer able to monitor all the ins and outs of a rapidly increasing range of public services. In 1900 Frank Goodnow could write the following: "Politics has to do with policies or expressions of the state will. Administration has to do with the execution of these policies." (1900, p. 18) While Goodnow is often remembered for advocating strict separation of politics from administration, careful reading of his book quickly shows he is much more nuanced. He writes: "The organ of government whose main function is the execution of the will of the state is often, and indeed usually, entrusted with the expression of the will *in its details* . . . [and that] the execution of law, the expressed will of the state, depends in large degree upon *the active initiative of the administrative authorities.*" (Goodnow, 1900, pp. 15 and 44; emphasis added) This observation points to growing interdependence of elected officeholders and career civil servants. More than 40 years later Leys observed the same:

> We can no longer pretend that executives merely fill gaps that have inadvertently been left in statute and constitution. Legislators admit that they can do little more with such subjects as factory sanitation, international relations, and public education than to lay down a general public policy within which *administrators will make detailed rules and plans of action.* (1943, p. 10, emphasis added)

Today, more than a decade into the twenty-first century, it is clear that many of the regulations that govern people's lives are enacted by career civil servants as secondary legislation and upon delegated authority (Furlong, 2003; Page, 2001). And so it is that historian and economist Scott Gordon observed:

> Legislators pass general laws, leaving it to the appropriate executive departments to construct the specific regulations by which the law is actually implemented. Citizens who find themselves afoul of the taxing authority [. . .] may ask to be shown by what authority they are being charged, but they will then be referred not to a statute, but to a small passage in a large volume of regulations written by civil servants. [. . .] Protection of the people's liberties from arbitrary exercise of official authority requires as much, or more, attention to the pedestrian activities of minor officials than to the majestic proceedings of a Parliament or Congress. (1999, p. 52)

The above observations pertain specifically to political-party-dominated systems, and then especially to the polyarchies. To anyone familiar with public sector personnel in developed countries it is clear that elected and appointed officeholders are very much intertwined, consult each other frequently, and thus are subject to varying degrees of politicization. Information in this and the next section concerns developed countries only, but can be used by career civil servants elsewhere to assess the situation in their own country.

The nature of political-administrative relations requires us to look at the interactions between elected and appointed officeholders at the higher levels of government, the so-called "summit" (unless indicated otherwise: information in this section is drawn from Raadschelders and Van der Meer, 1998, pp. 28–33). Until the first half of the nineteenth century in Europe and until the early twentieth century in the United States, top-level positions in government were occupied by society's socioeconomic-political elites. Political and administrative positions were not very differentiated, and officials were selected on the basis of kinship or friendship (Canada, Finland, Germany, Greece, Italy, the Netherlands, Spain) or on the basis of spoils (United States).

In the second half of the nineteenth century political parties emerged, and politics and administration became more visibly separated. Sometimes this went so far as to dismiss civil servants when they had declared partisanship, as was the case in Canada (Kernaghan, 1998, p. 102). More important, though, for the awareness that political-administrative relations were changing was the rapid growth of public services. Political officeholders increasingly recognized the need for more professional support and thus hired civil servants with a particular technical expertise (engineers, agriculturalists, architects, statisticians). Government not only grew in numbers but also increased the qualitative range of services provided and policies developed. In return for professional backing, political officeholders granted protection of tenure to career civil servants through enacting Civil Service Acts (for instance, United States 1883, Canada 1918, the Netherlands 1929, France 1946; the earliest known are Bavaria 1806 and Sweden 1809).

Meanwhile, this growth of administrative personnel prompted elected officeholders to strengthen their political control and they did so, for instance, through the creation or strengthening of the office of prime minister (Belgium 1920, the Netherlands 1937, Sweden 1936). Another, more invasive measure was to politicize the top career civil service positions from the late nineteenth/early twentieth centuries on. Even though career

civil servants were indispensable to policy making, the top-ranked positions were increasingly subjected to politicization. In most countries the upper ranks of the civil service are to some degree politicized. Exceptions include New Zealand and the United Kingdom. Of the 13 countries in Table 5.3 (Chapter 5), the United States is the only one characterized as very politicized, and this is because there are a substantial number of political appointees wedged between elected officeholders and career civil servants. While they can be found at all levels of American government, they are predominant at the federal level. This is not altogether desirable. On average they serve for only 22 months and thus have a short-term perspective. Furthermore, they mainly interact with other political appointees and elected officeholders and thus do not cultivate relations with the career civil service (Stillman, 2004, p. 132; Ingraham, 2005; Heclo, 1977; Maranto, 2005). In a 2004 report the National Academy of Public Administration (NAPA) noted that political appointees often lack the skills, agency experience, and networks that are vital to the operations of public organizations (NAPA, 2004, p. 66).

As can be expected, politicization has had consequences for the role and position of career civil servants vis-à-vis elected officeholders. Again, in Table 5.3 we can see how in most of the 13 countries civil servants provide policy advice, and in some cases next to consultants, university professors, and political advisers. Indeed, in most advanced democracies civil servants draft policy and legal texts, and then often in collaboration with major societal stakeholders such as labor unions, employer associations, and interest groups. The American case is once again different. Legislators make little effort to broker agreements through negotiations among stakeholders and seldom allow career civil servants to draft legislation (Bok, 2001, pp. 105, 133, and 163). They informally consult civil servants but are not obliged to do so. It is even known that they sometimes have been even explicitly excluded from attending meetings that they used to participate in on a regular basis (Golden, 2000). More than their colleagues in other developed countries they must walk a very fine line between protecting the general interest and advancing the elected official's goals (Ashworth, 2001, p. 9).

Aberbach et al. (1981) distinguish between four images of political administrative relations with image 1 being perfect separation, images 2 and 3 mixes, and image 4 a perfect blend into an administrative state. In general, in the developed world politicians and administrators operate very much according to image 3 (Aberbach and others, 1981). The rigorous separation of politics from administration (image 1) is seldom, if ever, reality. That elected officials articulate and mobilize the interests and values while civil servants provide facts and neutral expertise (image 2) is also unlikely, simply

because civil servants have the longevity in office, expertise, and organizational memory. More relevant to contemporary political-administrative relations is image 3, where politicians provide the energy and passion with civil servants serving with pragmatism and caution. We cannot say to what extent the overview here relates to developing countries, but suspect that political-administrative relations are more politicized as a function of appointments being more kinship and/or friendship based. Also, most comparative research into political-administrative relations has been limited to developed countries, so there is much work left to be done regarding the developing world.

Development of the Personnel Function in Developed Countries

As the political-administrative dynamic evolved in the developed world, so did the public personnel administration (PPA) or human resource management (HRM) function. In this section we will develop a dynamic ideal type of PPA/HRM based on the substance and nature of personnel administration in Western Europe and North America of the twentieth century. It distinguishes between *general approach/philosophy* and *political-administrative relations,* how these translated in personnel policy at the *organizational level* and at the *individual level,* and how this was influenced by developments in the *societal environment* (see Table 8.5).

Weber's ideal type of bureaucracy is an elaboration of one element of his more encompassing set of ideal types of authority. The ideal type of bureaucracy is the organizational expression of the ideal type of legal authority (Weber never used the term legal-rational authority; see Raadschelders and Stillman, 2007). Without legal authority bureaucracy can exist, but it cannot come to its fullest expression, and that is because it then serves under traditional or charismatic authority, which is geared to supporting the ruling elite (see Chapter 6). Legal authority thus provides the best possible foundation for a bureaucracy that is somewhat autonomous from the political leadership and serves the citizenry at large on the one hand, yet does not overshadow the political system on the other.

Western society in the third quarter of the nineteenth century was on the verge of change. Industrialization, urbanization, demographic growth, and political emancipation of ever-larger portions of the population together called for a more responsive and professional government. Both in Western Europe and North America the change from an agricultural-rural to an industrial-urban society prompted a swift response from

TABLE 8.5. THE DEVELOPMENT OF HUMAN RESOURCE MANAGEMENT IN THE DEVELOPED WORLD

	Old PPA	New PPA/HRM
1. *General approach/ philosophy*	*Hard; juridical; technique over purpose; "manpower planning"*	*Softer; sociological; "human relations"*
a. Importance of rules for PPA/HRM	a. High; toolbox of instruments	a. Lower; why use certain instruments
b. Dominant theory	b. Scientific/administrative management	b. HRM; empowerment
c. Central concept	c. Efficiency, legality	c. + democracy
d. Focus on . . .	d. Lower-level personnel	d. All levels
e. Gender image	e. Masculine	e. + feminine
2. *Political-administrative relations*	*Separate in theory: the juridical perspective, elected versus appointed*	*Mixed in practice: the sociological perspective*
3. *Organizational level: focus on organization*	*Top-down; centralized; internal; product*	*Top-down + bottom-up; mix of centralization and decentralization; process*
a. Type of bureaucracy	a. Machine bureaucracy	a. Professional bureaucracy
b. Position of HR unit	b. Subordinate staff	b. Facilitating, part management team
c. Nature of personnel system	c. Rule-driven; procedures; centralized	c. Mission-driven; decentralized
d. Budgetary consideration	d. Output; line item	d. Outcome; performance; program
e. Nature of job classification	e. Detailed for lower levels	e. Detailed for lower levels; general for higher levels
f. Reform focus	f. On efficiency or organization	f. On quality of service delivery

TABLE 8.5 (*CONTINUED*)

	Old PPA	New PPA/HRM
4. *Individual level: Employee position* a. Managerial role b. Recruitment focus c. Education focus d. Employee motivation e. Motivation enhancement f. Employee rights	*Emphasis on duties* a. Theory X b. Specific skills c. Training how d. Pursuit of self-interest through money, promotion, etc. e. Pay, career, rank f. Expressed in statutory law	*Emphasis on duties and rights* a. + Theory Y and Z b. SKAs (skills, knowledge, abilities) + potential c. + Learning why d. + Need for responsibility, altruism, recognition, inherent satisfaction e. + Through minor and major structural modifications f. + Expressed in constitutional rights
5. *Societal (organizational) environment* a. Focus on representativeness b. Focus on ethics c. Focus on collective bargaining d. Perception of public service	*Nonrelevant* a. Best person for the job; workforce homogeneity b. Bureaucratic responsibility c. Pluralist (conflictual) model; nonnegotiable compensation d. Civic duty; privilege	*Relevant; societal pressure* a. Cultural diversity b. Operational responsibility c. Unitary (consensual) model; negotiable compensation d. Civil rights

governments, especially in the areas of urban housing, water supply, sewage systems, public transport, road pavement, and so forth. The rapidly expanding public services (both in terms of quality and quantity), especially at local and regional levels, also required a public workforce recruited on the basis of relevant training and skills and professionalism rather than on the basis of patronage.

Personnel management across the Atlantic had been given a more legal foundation from the early nineteenth century on. Personnel management reforms since the 1880s converged on both sides of the Atlantic up to a point. The need to reform and professionalize the public service was expressed in the United States in the emergence of (civil service) reform leagues (for instance, the New York Civil Service Reform Association, 1877; the National Civil Service Reform League, 1881; professional associations; the New York Bureau of Municipal Research, 1906) and the creation of university chairs in political science. In Western Europe it was expressed in the development of "hands-on" curricula by local administrators for local administrators, the creation of professional associations, and the creation of university chairs. The difference between Western Europe and the United States is that in the former politics had been legally severed from administration from the early nineteenth century on and had thus resulted in earlier development of rules for recruitment, selection, appointment, and promotion. Another difference is that in the United States the demarcation of politics and administration was expressed in much stronger terms than in Europe, but the outcome was the same: What the French Revolution had done for European civil servants is what Garfield's assassination did for their U.S. colleagues. It legitimized a separation between popularly elected and expertly appointed public servants.

From the 1880s on, the development in Western Europe and in the United States is remarkably similar, since it is prompted by similar societal changes. On both sides it was during the 1880–1920 period that job classifications were elaborated from which detailed job descriptions were derived. On both sides efficiency became a major concern in the face of a rapidly increasing public responsibility for hitherto "private" concerns. This was expressed in the emergence of research as well as of more systematic teaching of public administration at large and personnel management specifically.

As a consequence personnel management in the United States adopted an impersonal, masculine approach. It became "harder," searching for and establishing more objective criteria for the recruitment and the selection of civil servants. The same happened in Western Europe but with a difference. Personnel management in Western Europe was approached as a matter of law, while in the United States it was approached as a matter of sound

administration built upon the principles of business (think of efficiency). Personnel management in the United States thus found its legitimation in the organizational ideology of scientific management. To be sure, the general approach to PPA on both sides of the Atlantic was initially juridical, since personnel management was especially focused on developing rules and standardized procedures for routing lower and middle level personnel from recruitment to retirement. PPA was a toolbox of instruments, inspiring Sayre to warn against the "triumph of techniques over purpose." (1948) The foundation may have differed (law or business), but the results were the same: personnel management on the basis of objectifiable and measurable criteria. Personnel managers developed quantitatively oriented and detailed job descriptions, productivity measurements, training programs, efficiency ratings and so forth. Not the individual employee but the organizational mission came first. In both regions this organizational mission was one of improving quantity and quality of public service delivery.

As time went by the concept of personnel management became associated with a traditional and somewhat obsolete approach. Especially after the Second World War the tone turned softer, more feminine, with an eye for human relations and more attention to the nature of the interaction between manager and subordinate. Rules and procedures continued to be important, but the new concept of HRM captured that the attention to organizational mission and individual employee had become more balanced. The new HRM attempted to better balance the demands of efficiency and legality with those of democracy. And finally, personnel management not only concerned lower- and middle-ranked employees. Increasingly, it encompassed all levels in the organization. Popular concepts such as employee empowerment, Total Quality Management (TQM), Management by Objectives (MBO), and strategic management are indicative of a quite different understanding of PPA.

Already briefly touched upon above is that civil service reform was also a response to changes in the perceived nature of political-administrative relations. In Western Europe the separation of politics from administration came in the aftermath of the French Revolution. In the United States the separation of these two spheres was increasingly advocated from the 1850s on. Of course, in a juridical sense they were separated (because they recruited on the basis of either election or appointment) while in a sociological sense they continued to be as intertwined as ever. As a consequence of legally uncoupling politics and administration, personnel management was considered an administrative function. After World War II, scholars and practitioners increasingly emphasized a sociological

perspective on the relation between both: They are mixed in practice. Personnel management is thus perceived as operating in a politicized arena. In fact, many of the changes in HRM in recent decades have been brought about because of environmental pressure for better representation of the population (in the United States, for instance of, African-, Hispanic-, and Asian-American people; women; disabled people; senior citizens, gays). Increasing workforce diversity indicates that HRM is influenced by politics and by citizen desires. (By way of side note: In later subsections we will focus on the development of the personnel function in the United States but believe that it is to quite some degree comparable to that of other developed countries.)

The Organizational Level: Personnel Management Focused on the Organization

The old PPA fit in a context where organizations were centrally managed, where a clear unity of command existed, and where the organizational focus was on the service and the product. Old PPA was tailored to meet the requirements of a machine bureaucracy (see Chapter 6) and thus focused on streamlining and standardizing processes of personnel management. As already mentioned, the personnel system was rule driven and emphasized procedures. Staff in the bureaucracy was subordinate to line management and merely provided functions asked for by the line managers. From a budgetary perspective the human resource was a line item; in general the focus in the budgetary process was on output. If reform was considered, it was to improve the efficiency of the organization. Hence in the earlier parts of the twentieth century the employee was regarded as a position, a job. In one of the earliest handbooks of personnel administration it was said thus:

> The job is the molecule of industry; and what molecular study has done for physics and chemistry, job study with the aid of every possible instrument of precision can begin to do for industry. (Tead and Metcalf, 1920, p. 255)

Frederick Taylor's time and motion studies had attempted to do just that. What actions with respect to PPA were taken given these changes? The city manager became the local head of the bureaucracy; most appointments fell to his authority. In 1912 the city of Chicago established a job classification system (although in rudimentary form it had already started in other places in the 1850s), shortly afterward followed by the State of Illinois. The

1923 Classification Act provided job classifications for the federal civil service.

Civil service reform was initially undertaken to enhance the efficiency of the organization, but in the course of the 1930s attention shifted to a more proactive public sector in response to the Great Depression. The public sector, for instance, was increasingly seen as a means to alleviate the pressures of massive unemployment. While efficiency continued to be an important consideration, it was management that became the more important principle. The 1937 Brownlow Committee marked the beginning of the "administrative management period" (1937–1955). There was still hope that principles of management (for instance, Gulick's POSDCORB: planning, organizing, staffing, directing, coordinating, recording, and budgeting) and principles of organization (such as Gulick's typology of foundations of organization: goal, area, process, clientele) would be discovered. The following quotation is taken from Mosher's analysis of the Brownlow Committee report and captures the beginning of a new style PPA:

> Personnel was seen as a principal, if not major, tool of management. [It] should be organized as a staff aid integral to the operating organization, not as a semi-independent agency. [. . .] it should operate primarily as a service to managers up and down the line, not as a watchdog and controller over management [. . .] At the top level [personnel management] should be concerned with the development of standards and policies. Personnel operations [. . .] should be decentralized and delegated to bring them into more immediate relationship with the middle and lower managers whom they serve. *Personal and interpersonal considerations should be reintroduced into personnel administration, even if they cost some degree of objectivity and of scientific technique.* (Mosher, 1968, p. 82; emphasis added)

By the time that the second Hoover Commission presented its report entitled *Personnel and the Civil Service* (February 1955), personnel administration was firmly a part of management functions. As a consequence the focus on personnel management at the organizational level combined top-down and bottom-up perspectives and advocated a functional mixing of centralization and decentralization. Personnel managers served an increasingly professional bureaucracy and acted more and more as an integral part in developing and achieving the organizational mission. "Outcome," "performance," and "quality" became keywords underlining this mission-driven

orientation. This had also very tangible consequences for personnel management. Job descriptions now were extended to include the higher positions in the organization. They became more and more detailed for lower- and middle-level positions and more general at higher-level positions. In the decades that Mosher labeled the "professional period" (1955–1970), the diversity of the public workforce increased rapidly in terms of educational background. Henceforth HRM had to take into account that it provided services not only to blue-collar positions and lawyers, but also to scientists, social scientists, educators, economists, medical doctors, nurses, and political and administrative science graduates, all working in policy-making positions.

Especially in Anglo-American countries we have seen attention to management resurface in the form of new public management (NPM). Many people believe that a focus on performance will improve the quality of public services, and so a variety of reforms were attempted, including civil service reforms. This involved the effort to make public managers more responsible for outputs specified in annual performance contracts and was, for instance, implemented in New Zealand. There is attention for improving management through civil service reforms in other countries as well, but the results have been mixed. On the European continent NPM has been much less influential simply because of a political-administrative culture that is very different from that of Anglo-American countries (see Chapter 6). Civil service reforms in the NPM mode were not regarded as beneficial in developing countries, simply because a tradition of formal contracts and mechanisms to enforce them was missing (Schick, 1998). Indeed, in Mongolia, for instance, New Zealand-style reforms failed for various reasons (difficulty in assigning a cost to outputs; lack of time; difficulty in assessing quality; lack of incentives) (Hausman, 2010, p. 9).

The Individual Level: The Employee as a Person with Rights, Needs, and Feelings

Under old PPA the theory about manager-employee relations was dominated by what Douglas McGregor called "theory X."' (1960). The employee had to be supervised because he was essentially lazy. The general idea was that the employee was motivated by salary and promotion. In the labor relationship the emphasis was on duty. The employer "bought" your time between 9 and 5, which meant that as soon as you walked in your office you ought to have left domestic worries behind. Of course, in reality it was not like this, but it did have very practical consequences for personnel

management. Given the emphasis on duties, given clearly defined tasks, and given fairly detailed job descriptions, the educational focus, for instance, was on training for specific skills. The focus of recruitment was on specific skills. Legislative activity relevant to work conditions mainly concerned statutory law that regulated job description and classification, pay, hours, and benefits. The 1883 Pendleton Act, the 1923 Classification Act, and the 1938 Fair Labor Standards Act are good examples.

From the 1960s on, the emphasis shifted to a combination of duties and rights. Manager-employee relations were now interpreted as theory Y without forgetting the "teeth" of theory X (free after Aristotle: "laws must have teeth"). The employee was internally motivated to do the job and derived satisfaction from more than just the pecuniary rewards. The new employee allegedly desired responsibility and recognition. Again, this is theory but with practical consequences. The recruitment focus turned to a combination of acquired SKAs (skills, knowledge, and abilities) and potential for the future. The educational focus turned to a combination of training and learning. That regular universities developed advanced programs for professional categories is a feature of only the past six decades. Motivation enhancement beyond financial compensation was not really an issue before World War II. After that war, though, a variety of minor structural modifications to the work situation (for instance, job rotation, work modules, project and task forces) were introduced. From the 1970s on, work conditions as well as the manager-employee relation became the object of major structural modifications (job enrichment, shorter workweek, flex-time, employee empowerment, TQM, MBO, and so forth). Together, temporary or more lasting minor and major structural modifications have served to enhance morale and to strengthen loyalty to the organization.

Legislative activity reflects the fact that the employee is not a "job" or a "position" but an individual who needs to be protected from unsavory work conditions and whose constitutional rights have to be observed. The American Presidents Kennedy, Nixon, and Clinton have used the executive order (i.e., regulatory law) to slowly expand public employees' rights to collective bargaining. As important as these regulatory actions are, all the legislation passed by the American Congress aims at protecting the constitutional rights of the employee both in the public and the private sectors. Many of these acts are concerned with protecting people against discrimination (on the bases of gender, race, age, physical ability, sexual orientation, and so forth). The oldest act of that type of legislation was the Equal Pay Act of 1963. This act and many since emphasize that as citizens we are all equal not only in the eyes of the law but in terms of opportunity in employment. The

impact that this had on personnel management is clear. Workforce diversity is no longer only an issue of professional background (employees with different educational backgrounds) but one of representative bureaucracy (at least in terms of the composition of the population). The personnel manager will proactively develop plans to hire people who are labeled a minority through Title VII of the 1964 Civil Rights Act (affirmative action, equal employment opportunity). Managing workforce diversity is considered one of the greatest challenges of modern HRM. Increased sensitivity to the demographic makeup of society is, prior to recruitment, visible in various ways. Equal employment opportunity and affirmative action programs assure some proactive enhancement of representativeness. The Professional and Administrative Career Examination (PACE) system that was used between 1974 and 1982 was terminated because of cultural bias. Also, some public organizations (such as the U.S. Air Force) no longer require photographs of applicants, and they have taken out the part on the application form where the applicant had to indicate race. And of course, during employment the protection of employee rights and sensitivity to diversity is apparent in the sexual harassment case law, the Pregnancy Discrimination Act of 1978, and the Family and Medical Leave Act of 1993.

The Societal Environment: Public Pressure for Change

By way of generalization one could argue that changes in organizations at large and in personnel management as organizational function specifically have been first and foremost motivated by the dominant theory on political-administrative relations. Another generalization could be that changes in work conditions and manager-employee relations have been first and foremost motivated by an individual focus on HRM and by pressure from the societal environment (Section 5).

Before the Second World War the societal environment was not really relevant in the perception of public managers. Representativeness was a nonissue. You simply hired the best person for the job. More important, workforce homogeneity required little sensitivity to representativeness. Given that the organization had to do the most efficient job possible, employee needs were subordinate to that end. Morale and ethics were interpreted at the level of bureaucratic responsibility, or what John Rohr (1989, p. 60 and following pages) called the low road (codes of ethics, ethics legislation). The organization did not care too much for outside pressure such as from labor unions. The freedom of association was not considered applicable to those who worked in the public sector. The focus on collective

bargaining was thus that of a pluralist (conflictual) model. And certainly in the public sector wages, hours, and fringe benefits were nonnegotiable, for that fell to the authority of the Civil Service Commission. And finally, the public generally had some respect for people in the public service, possibly more so in Western Europe than in the United States. Certainly in Western Europe the idea that working for the government was a privilege was strong until the late 1950s. Beyond the major reforms governments instigated around the turn of the twentieth century, the public at large did not appear to have much interest in the structure and functioning of their government.

It becomes repetitive, but all this changed from the 1960s on. Public opinion strongly desired a more representative bureaucracy. In society at large the focus on morale and ethics has come to include the level of operational ethics (also known as procedural ethics or professional ethics) that combined the earlier sense of bureaucratic responsibility with an appreciation of "third-level ethics," to use Bruce's phrase. The consequence for the employee and for personnel management is that it elevates the "employing, empowering, supervising, retaining and terminating of workers to the realm of ethical discussion." (Bruce, 1995, p. 115) We could call this the ethics of managerial or operational responsibility.

Public opinion since the late 1970s also desired a smaller government. In general, some cutbacks have been achieved, especially at the level of blue-collar jobs and middle-management positions. Privatization and contracting out have resulted in a more bureaucratized workforce at the federal/national levels of government in the sense that the relative number of white-collar workers has increased. The consequence of this in terms of personnel management is that collective bargaining is more perceived in light of a unitary (consensual) model. Disagreements between management and employees can be solved through one-on-one interaction or through mediation. Furthermore, the higher white-collar employee in government is generally well educated and able to take care of himself. At higher positions financial and other types of compensation are negotiable up to a point, something that would have been inconceivable even 30 years ago. Also, developments of public sector pay generally lag behind those in the private sector, not to mention the fact that public sector pay for higher-educated and experienced professionals is on average lower than in the private sector. After all, public sector pay is taxpayers' money. Hence, in this sense too, the pressure of the environment has consequences for personnel management. Finally, government jobs are no longer fulfilled on the grounds of civic duty or privilege. Rather, public sector jobs are a right, based on merit (the best person for the job), on notions of equality of

opportunity, as reparation for past injustice, and/or of "patronage" (certainly for political appointees).

As in the previous section, we suffer from lack of systematic, comparative information about the development of personnel management in developing countries. Furthermore, even though the description in this section is based on the American development, we do think that by and large comparable developments can be found in the rest of the developed world. As for developing countries, many bi- and multilateral donors increasingly consider HRM reforms as vital to successful change.

Concluding Comments

Bureaucracies have become very important everywhere to the overall development of society, and its career civil servants have become by far the largest category of public servants in the developed world, especially at the national level. We have seen that in some developing countries, laborers are still quite important, but we cannot say much about the composition of the career civil service in the developing world for lack of systematic research. In developed countries the role and position of government in society has changed enormously in the past 200-plus years, and this left its mark on those who work in government. First, the overall size of the public workforce increased significantly. Second, to assure professionalism within the career civil service, politics and administration came to be regarded as separate functions (at least in a legal sense). That in practice, in a sociological perspective, they are intertwined has not influenced appointments in the career civil service as a whole. Only at the higher and highest career civil service ranks have appointments become politicized, although to varying degree. Third, professionalism in the career civil service has also been enhanced by means of standardizing the personnel function as much as possible (job description, job interviews, rules for promotion, performance management and measurement, and so on). All this has, fourth, resulted in a much less corrupt career civil service than ever before. How this vast personnel system functions internally is important to personnel or human resource managers; what it actually does externally is important and much more visible to the population at large. While Chapters 2 to 8 provided a comparative perspective into the contemporary structure of government (territory, bureaucracy, state, political system, civil service), Chapters 9 to 12 will show the range of different activities and policies governments today are involved in.

MANAGING POLICIES: CONTINUITY, CHANGE, AND DIVERSITY

TRADITIONAL GOVERNMENT ACTIVITIES I

National Defense, Police, Law and Order

This chapter encapsulates core tasks that governments hold sway over: protection of the jurisdiction from extraneous threats (military) and inside turbulence (police) that, alongside the system of law and judiciary, constitute and epitomize the gist of a nation's sovereignty. Governments since antiquity have been contingent upon these traditional services. Looking at various structures of the construction of power and law systems as well as cultural diversity and reliance on values and tradition, we will illustrate the administrative challenges facing states across the globe and suggest some elements of comparison. Attention will be given to the general development of military, policing, and judiciary services (including prisons) in a variety of countries from all continents, giving special attention to functionality of structures in a given culture and the administrative uniqueness that has been set up to allow the continuation of life in a secured environment. We also will discuss two specific and very contemporary global challenges: emergency management (cast to handle natural disasters as well as those inflicted by man) and security and migration policies.

Atrocities of Man and Nature: National Defense and Emergency Management

Fighting between (and sometimes within) groups has been part of human history since time immemorial. The military classes, as Mosca called them (1939, p. 222), have for most of history been at the apex of stratified society.

Indeed, the commander of these classes was often also the ruler, leading ad hoc or mercenary armies. What changed in modern times, especially since the nineteenth century, is that states instituted standing armies (at least in the Western world) that are subject to civil authority (Mosca, 1939, p. 229). This had been unthinkable in premodern times, because armies had the capability of overthrowing political regimes via a coup d'état, which has happened in modern times as well; for instance, in nineteenth-century Latin America, in twentieth-century Europe (Greece, Spain, Portugal), and in twenty-first-century Egypt. The standing is also a professional army, a full-time occupation requiring specialized training (Huntington, 1957, p. 19). The professional military emerged as the primary instrument to defend the territory against foreign aggression, but starting in the centuries before the Common Era, they were also used in humanitarian relief. Initially, that relief took the form of interim military administration of conquered lands, assuring that the population would have a regular food supply (Cuny, 1989). This role of the military expanded enormously in the second part of the twentieth century, with military not only being deployed to aid in domestic disasters but also to serve in international relief efforts (Wiharta and others, 2008). The cases in this section address challenges found everywhere: professionalization of military, the shift from conscripted to voluntary armies, and the use of military personnel in national and international disaster relief.

France: Europeanization, Professionalization, and the End of Conscription

Conscription had been the basis of the armed forces since the *levée en masse* of 1793 and the 1798 *loi Jourdan* that established the principle of conscription (unless stated otherwise, this section is based on Irondellea, 2003a; Lecomte, 2006; Bloch, 2000; Cole, 2010). Increasingly, national defense forces became widespread in Europe. After a century of de facto universal and compulsory military service, conscription was finally consolidated by law in 1905.

Political and military actors and the public at large endorsed and legitimated service in arms that was premised upon a personal obligation, universal in reach, and with a duration equal for all. After France had gained an independent nuclear arsenal, the *Force de Frappe*, the army was reduced to a secondary role in the nation's defense but remained a symbol of French patriotism and a locus of national aspirations to the rank of the world's "third military power." Still traumatized by the collapse in civil-military relations during the Algerian rebellion, the presence of the

conscripts was greatly valued as a "sacred current of air" and a means to maintain ties with the nation.

The end of the war (1954–1962) evoked contemplations regarding military manpower. Rethinking was also spurred by the *détente* that prevailed in the sphere of international relations. France aligned itself with other Western democracies that had downgraded their militaries: Military expenditure as a share of the French national budget fell from 28.5 to 14.8 percent between 1960 and 1992. Apart from nonsupportive military and financial trends, social changes epitomizing industrial democracies such as a rise in individualism and a corresponding decline in traditional values and attitudes gnawed at the legitimacy of the system. The decline of conscription following the end of the Algerian war (1954–1962) encouraged professionalization and increased the numbers of career professionals within the total volume of the armed forces.

From the 1970s onwards, successive governments opted for a more or less artificial reduction of military manpower. As both the duration of service and the pool of potential recruits eligible for national service had been circumscribed, the previous universal and compulsory draft was progressively transformed into a short, selective, and differentiated service. By the end of the 1980s, the French military became a pseudoconscription body with barely 50 percent conscripts. The system's dysfunction notwithstanding, and although deemed desirable and utterly necessary, professionalization was rejected up to the mid-1990s; it was also regarded as too expensive and financially risky. Drawing from the experience of the American military, doubts were cast whether professionalization can give rise to military manpower of sufficient quality and quantity.

In the early 1990s, France retained the defense posture laid down by President Charles de Gaulle 30 years before. Nevertheless, the volume of the armed forces decreased from 1,153,000 men in 1957 to 520,000 in 1992. Built around a principle of national strategic autonomy, these policies served French interests in the Cold War when, as an associate of NATO remaining outside the unified military structure, France enjoyed the security privileges of NATO membership without sacrificing any of its jealously guarded sovereignty.

Obsessed by the defense of the nation's eastern frontier since the 1870s, after the 1989 collapse of the Berlin Wall the army suddenly found itself with no threat to the nation, but France still ventured to maintain its international stature and ascendancy next to the economic powerhouse of a reunited Germany. The outbreak of the Gulf War in 1990 forced these contradictions into the open. Barred from most operations outside

France since the early 1960s, conscripts could not be sent to the region without the approval of the National Assembly. Faced with fierce public opposition to military action, French President François Mitterand saw little advantage to a debate over the question. Determined not to leave France on the sidelines, he decreed that only professional troops would fight. The army scrambled to cobble together an improvised all-professional force, transferring 5,000 professionals from throughout the army to fill out an expeditionary division of 15,000 men. Once in Saudi Arabia, the French were relegated to a role of relative inconsequence as they depended upon the United States for tactical intelligence and logistical support.

Conscription was ratified in two consecutive Military Programming laws in 1991 and 1994 and in the *Defense White Paper* of 1994. The white paper confirmed the notion of conscription but marked a strategic rupture deeper than just the end of the Cold War, when for the first time since 1871 military planning and structure were not shaped by some major threat against the national territory. As the traditional notion of war between nation-states had given way to crisis management, French forces were destined to take part more often in foreign interventions, so military missions have evolved along two main lines: actions external to the national territory, and inclusion in multinational operations.

As he tried to mobilize new electoral resources vis-à-vis his adversary Prime Minister Édouard Balladur with his Gaullist family roots, Jacques Chirac, then still a presidential candidate in the campaign of 1994–95, suggested modernizing a significant element of the state apparatus by abolishing the draft. On February 22, 1996, Chirac, the newly elected president, utterly steered away from what had been promulgated by French authorities just a few months earlier and mandated full professionalization of all forces by 2002. Three months later, on May 28, the president announced the end of compulsory military service.

Successful reforms need to be compatible with the prevailing self-representations of professionals, so army officials culminated a 20-year-long effort to switch from rigidly defined forces to "modularity" that enable the army to tailor forces to the needs of the moment. The army seized the reins of the reform, making it easier to induce change in the right direction. France's Napoleonic heritage and statist nature underlie an administrative system that is not readily amenable to change (Rouban, 2008). Such a radical shift has been brought about by critical conjunctures whereby distinct causal sequences interacted at particular points in time, opening up possibilities for radical political change.

External forces matched with internal ones to tip the balance in favor of a change that had been contemplated and debated for many years. Europeanization pushed for greater integration, affecting both cognitive and normative frames as well as actors and instruments of public policy (Irondellea, 2003b). Owing to the end of the Cold War together with the Gulf War and an eager-to-win presidential candidate, the time was finally ripe to forgo conscription (De Wijk, 2003; Irondellea, 2003b).

Israel: Militarized Society or Civilianized Military?

The Law and Administration Ordinance, one of Israel's earliest first acts (1948), authorized the provisional government to establish land, air, and naval armed forces, vesting them with the authority to do all lawful and necessary acts for defending the nation (unless stated otherwise, this section is based on Seidman, 2010; Peri, 2006; Cohen, 2008; Levy, 2008, 2010; Bar-Joseph, 2010; Bar-On, 2012; Kober, 2008, 2011). The Defense Army of Israel Ordinance No. 4 supplemented the general provision shortly after. Neither Section 18, which is still in force, nor later statutes have elucidated what the actual roles and functions of the Israel Defense Forces (IDF) are. Since the mid-1990s the Knesset has expanded the language to provide a sound legal basis for the national but not purely military roles that the IDF has been expected to carry out. From the very outset, then, political and military dimensions have been blurred.

The War of Independence between 1947 and 1949 resulted in horrendous bloodshed: 5,800 people were killed in the fighting and over 12,500 wounded out of a total Jewish population of 650,000. One in every five of the war's victims was a civilian, a proportion roughly similar to the UK war dead during World War II. Still, Israel developed nothing like Britain's "Blitz myth" of civilian heroism. The depth of feeling aroused by military associations amidst wide sections of the Jewish population reversed the traditional Jewish reticence toward matters military. Militarism, thus, was not deliberately imposed on an otherwise passive population by the elites, but was rather a bottom-up phenomenon whereby Israeli-Jewish citizens embraced the armed forces as a defining ingredient of their new state.

When the new nation suffered a decade-long austerity regime, the IDF became an indispensable tool in governing the new nation. Faced with enormous challenges, Prime Minister David Ben-Gurion used the military service as a tool to promote government agendas and shape the "new" Israeli, so the IDF took part in all national tasks, providing also ideological underpinnings. Apart from its popularity and legitimizing capacity, the

military was perhaps the single most useful agent at the disposal of the civilian government of Israel. The military proved a relatively disciplined, cheap, and practical tool to carry out government policies, since it was composed of unpaid yet well-organized conscripts. IDF engineering units, for example, were used to construct and maintain many of the camps that absorbed newly arrived immigrants.

Since economic considerations ruled out the option of a fully professional army, a Swiss-type militia has been devised based on short conscription terms. The passage in 1949 of the National Service Law mandated conscription and reserve duties, bringing all citizens to bear the responsibility to defend their homeland, not just those who volunteered to assume that burden. By way of elimination, the IDF's famous "three tier system" has been grounded on compulsory enlistment for every Jewish man and woman, the length of which settled in the 1970s at two years for women and three years for men. The army's core was a small regular army consisting primarily of conscripts, with the officer corps and part of the professional echelon staffed by career personnel. The large reserve army was composed of conscripts obligated to undertake several weeks of reserve duty every year in order to maintain their fitness as soldiers in case of war.

For the most part, the three IDF branches have been highly unified. Although the navy and air force have had separate headquarters and different uniforms, the general staff has served as the operational directorate of all the elements of the armed forces, and the chief of the general staff (CGS) has been the nation's senior officer and the supreme military commander. The CGS has always been one of the most powerful and potent persons in Israel, possessing a capacity for political influence greater than that of his counterparts in other democracies.

Mass compulsory recruitment has been the cornerstone of the Israeli version of statism that has endowed the army with favored symbolic status as a universal and depoliticized military that stands above sectarian divisions, and tied a Gordian knot between soldiering and citizenship. The purported threat to Israel was discursively intensified, and the army took on the roles of nation builder and melting pot. The IDF was consolidated and spearheaded by the dominant social group of middle-class secular Ashkenazi men, so the very group that had founded the army populated its senior ranks and was identified with its achievements. Peripheral social groups and in particular the Mizrachim enhanced the army quantitatively but were perceived as unable to shape its qualitative values. Women were marginalized as well since they were relegated to auxiliary roles. Apart from its symbolic meaning, military service

demarcated the boundaries of society, becoming a decisive standard whereby rights were awarded to individuals and collectives alike.

Israel's post-Mandate intelligence community was established in the summer of 1948, in the midst of its War of Independence. The community consisted of three main information services: military through the IDF, domestic through the Prime Minister's Office, and foreign-political through the Foreign Office. The prime task of the military intelligence service was defined as the collection and analysis of information about the Arab world and in particular its armies. The foreign political service was assigned a comparable responsibility, which was to collect intelligence about the rest of the world, primarily Europe. However, in 1950 growing concern with the quality of information that the Foreign Office was providing led military intelligence to violate the agreed division of labor and to start intelligence gathering in non-Arab countries as well. In 1951, bitter bureaucratic rivalry had put an end to the Foreign Office's intelligence service, after which the Institute for Intelligence and Special Roles (the Mossad) was forged under the auspices of the Prime Minister's Office. From 1953 onwards, the Foreign Office had no longer gathered and/or assessed global and regional strategic intelligence, so the military intelligence became the Directorate of Intelligence (AMAN, Agaf Modiin) in the IDF GHQ, filling the vacuum by becoming Israel's sole intelligence estimator.

Most scholars have deemed the Six Day War (June 5–10, 1967) the event that triggered the expansion of the army's role in national security affairs, granting it an extended share in policy making. Some of them even go as far as characterizing the behavior of the Israeli generals prior to the war as a "putsch" or a "revolt." AMAN failed to foretell that a war was imminent based on a false conception. On the other hand, the move of the best-trained and equipped Egyptian armored division to the center of Sinai on May 25 was interpreted as an indicator of offensive intentions. The related controversy pitted generals against Levi Eshkol (the prime minister and minister of defense) and his ministers when generals pushed for a preemptive offense, whereas the political echelon endeavored to buy time while exhausting diplomatic efforts. As generals reprehended the politicians' hesitant vacillation, the criticism filtered through the mass media to the public. During those tense days Ben-Gurion, the octogenarian leader, expressed a number of times his apprehension that a military coup might take place, but an out-and-out revolt never materialized as Eshkol finally caved in to the public's and the media's outcries and ceded the defense portfolio to Moshe Dayan. By then, Eshkol was ready to yield to his zealous generals after all political and diplomatic ventures had come to nothing, but

his successor finally gave the order and set an onslaught in motion. In the wake of the 1967 war, Arab armies were destroyed and large territories were occupied. The "existential threat" idea has given way to the motif of "security borders."

The IDF had a decentralized and mission-oriented command system hinging heavily upon IDF commanders' resourcefulness and improvisation skills. However, a good mission-oriented command should not count solely on resourcefulness and improvisation, but also on a thorough educational and training process whereby all commanders acquire the same set of professional tools. Yet, IDF commanders' lore has been wanting to the extent that the IDF has been accused of having a "bad anti-intellectual tendency" because the stronger Israel has become, the more the IDF has relied on its muscle rather than its brain. Yaacov Hisdai, a senior researcher for the Agranat Commission of Inquiry that investigated the circumstances leading to the outbreak of the 1973 October War, concluded that the IDF commanders under consideration lagged in innovation, abstract thinking, and a sense of criticism. The post-1967 War hubris and the "aura of prestige" on the Israeli side overshadowed Israel's decision makers with regard to the military.

Since the 1960s and 1970s the relatively few nonsabra IDF commanders, some of whom were interested in the intellectual aspects of the military profession, gradually disappeared from the officer corps, leaving the stage almost completely to the sabras. The sabras, the native-born Israelis, have a practice-oriented mentality, which results in strong performance-oriented behavior. As the years passed, IDF commanders accumulated much experience both in high-intensity and low-intensity conflicts, developing an experience-based *coup d'oeil*. Good intuition had often led to good decisions or success on the battlefield, which strengthened the feeling among IDF officers that there was no need for formal learning. Unaware of the whole spectrum of opinions presented by military thinkers with respect to the question of offense versus defense, IDF commanders opted mainly for offense as their preferred form of war. However, when it came to low-intensity conflicts such as Israel's War of Attrition with Egypt (1967–1970), the IDF was wise enough to apply a more balanced, defensive/offensive approach, as required by the nature of the challenge.

Following AMAN's failure to warn that war was brewing in early October 1973 and the subsequent high cost that Israel paid for this oversight in the Yom Kippur War, an official investigation, the Agranat Commission, recommended ending the military monopoly and establishing analytical intelligence organs in both the Mossad and the Foreign Office.

Consequently, in 1974 the Mossad set up a strong research body (the Directorate of Intelligence) while the Foreign Office's analytical body, the Political Research Department, remained relatively weak and unimportant. Despite the fact that AMAN's Research Division lost its status as the sole estimator, it has maintained its seniority and serves to this day as Israel's senior intelligence estimator. Moreover, Israel is the only liberal democracy in which a military organ, AMAN's Research Division, serves as the leading national intelligence estimator not only in military affairs but also in political, economic, and all other issues considered relevant to the state's security. AMAN chiefs interact intensively with Israeli policy makers, bearing mainly on the prime minister and the minister of defense. Other developed democracies regard such an arrangement as unhealthy for democratic life, primarily since it imbues the military with too much power, weakens the power of civilian institutions, and blurs the border between civilian and military authority.

Against the backdrop of performance problems revealed during the 1973 October War and the 1982 Lebanon War, a revolutionary curriculum was launched in 1989 at the Command and Staff College named Barak ("lightning" in Hebrew). The program aimed at higher-rank commanders, integrating for the first time theoretical, historical, and doctrinal knowledge and offering tools for improving doctrines, plans, and operational performance. Nevertheless, in 1994 Barak was closed. Its instructors, who had been carefully selected from within the IDF as well as from academia, were blamed for "elitism" and released from their jobs one by one.

As early as the sober aftermath of the Yom Kippur War, social attitudes toward the IDF started to shift. Throughout the cultural and economic globalization of Israeli society that had started in the 1980s, neoliberal doctrines loomed large. In the 1980–2006 period military spending as a proportion of GDP dropped by more than 50 percent while GDP rose by about 200 percent. The army's role in defining social hierarchy eroded, giving way to other considerations such as individualism, privatization, competition, and efficiency. Individual achievement superseded the test of statism.

Reserve duty became a heavier duty in both absolute and relative terms, as it hampered soldiers both from effectively contending in an increasingly competitive labor market and from fulfilling their roles as fathers within a more equal division of labor in the family. Those bearing most of the burden pressured to lessen military sacrifice or to augment the rewards for it. Motivation to embark on combat duty has waned, giving rise to a "motivation crisis syndrome." Rather than standing above the market or

even competing with it, the IDF was gradually subordinated to the market. The Economic Stability Plan of 1985 subsumed, inter alia, a reform in the reserve army. Its main thrust was to transfer the cost of reserve duty from the National Insurance Institute to the army. Attaching a price tag to the service of reserve soldiers had instilled economic considerations in the army, which reduced the number of overall reserve duty days. A semiselective recruitment model has been devised for the first time, endeavoring to compensate for lost reserve duty days with quality of reservists.

After the reserve service had deviated piecemeal from universalistic principles of an inclusive people's army, the military service at large soon followed suit. Military service had been beyond debate for many years but in 2010 less than 75 percent of Jewish males of draft age (Palestinian citizens have been exempted from service) enlisted in the IDF; these declining conscription rates attest to the subjugation of military values to the market. By the mid-1990s, the IDF was no longer a sacred cow as the Lebanese imbroglio and the two intifadas ruffled the previously prevalent equanimity of Israel's cultural elite. Generals began to attract as many iconoclasts as idolaters. A stream of military-related films, novels, plays, and collections testified to the growing strength of the new mood. The rule of silence, which had formerly upheld military immunity to parental criticism, was broken as bereaved parents, sometimes alone and sometimes in groups, demanded officers to account for the death of soldiers in military accidents, trying to thwart their promotion. At the same time, many watchdog organizations have started making headway, publicizing and legitimizing public concerns about the conduct of the IDF. Correspondingly, the mass media has started to be more exacting and fierce concerning once tabooed, hushed-up security matters.

A further threshold was crossed in the wake of the 2006 Second Lebanon War when, in marked contrast to their forerunners in 1973 and 1982 (Yom Kippur and the first Lebanon War), bereaved parents called for accountability not only of the political echelon, but also of the CGS and additional senior officers, demanding their resignation. Many scholars impute the erosion of the IDF's consensual status to the predicament of the Second Lebanon War where the IDF did not achieve a battlefield decision against Hizballah and even more so to the protracted Low Intensity Conflict (LIC) with the Palestinians.

In his testimony before the Winograd Commission (2006) erected to delve into the Second Lebanon War debacle, the defense minister, Amir Peretz, admitted that he had seen the chief of staff and the general staff as his "number one advisory body" on operational matters. Therefore, having

a staff at the Defense Ministry would only be considered by the military a "super general staff." The committee also excoriated anti-intellectualism in IDF's general staff, pointing to the correlation between improvisation, which became part of Israeli culture, and lack of professionalism.

The Israeli system ailments of disdain for knowledge and theory and the IDF's monopoly on assessment seem to persist in the face of strong grounds dictating otherwise. However, some changes do take place in the IDF, one of which is privatization in line with the recommendations of the Brodet Committee appointed in 2007 to examine the defense budget. Military kitchens, vehicle maintenance, and soldiers' transportation services, construction and maintenance of physical plants, and various instruction courses ranging from driving courses for Hummer vehicles to pilot instruction constitute only part of contracted-out undertakings. This process will continue apace in keeping with global trends, as it is more cost effective to do so than to retain those functions inside the military.

United States: Resting on Its Laurels—FEMA's Vicissitudes from Ignominy to Luster and Vice Versa

Federal aid to disaster-stricken citizens dates back to the San Francisco earthquake of 1906 (unless stated otherwise, this section is based on Coyne and others, 2009; Irving, 2008; Perrow, 2005; Roberts, 2006; Schneider, 2005; Irons, 2005; Garnett and Kouzmin, 2009; Jenkins, 2010; Jurkiewicz, 2009). President Theodore Roosevelt was alarmed by the disaster and sent federal troops to help, but local officials and not federal authorities were always in control albeit unofficially. The first broad legislation defining federal authority in disasters was the Civil Defense Act of 1950 that centralized programs for defense against nuclear attack. Federal involvement in natural disasters was mostly ad hoc and too little too late. A series of ferocious natural disasters in the 1960s and 1970s caused great destruction, tipping the balance in favor of greater federal involvement. As legislation expanded, agencies had been organized and reorganized so that by the late 1970s a multitude of agencies sometimes worked at cross-purposes. The corollary fragmentation at the federal level called for a comprehensive emergency management policy to coordinate federal, state, and local responsibilities.

President Jimmy Carter responded by creating the Federal Emergency Management Agency (FEMA) in 1979 in one of his last attempts to restructure the federal government. Reorganization frustrated attempts to rationalize and streamline disaster policy. Carter's authority was limited

and in order to set up the new agency without congressional opposition he transferred staff, political appointees, and procedures from existing disaster organizations. FEMA's primary goals were disaster relief, prevention, and mitigation. The secondary ones were coping with a nuclear attack and national security, something normally in the hands of other agencies.

As the Cold War intensified in the early 1980s, President Ronald Reagan gave FEMA a renewed civil defense mandate; the first goals were neglected and starved of resources while the secondary ones flourished. Within FEMA, the small division of the National Preparedness Directorate (NPD) was ordered to develop a classified computer and telecommunications network to secure continuity of government in the event of a nuclear attack. The network was developed by the National Security Council (NSC) and subsumed into the broader Department of Defense (DOD) under the national defense information network. Though initiated by FEMA and drawing upon more and more of its budget, only the DOD and the NSC could access that network while FEMA's disaster relief personnel could not. FEMA had developed one of the most advanced network systems for disaster response in the world, yet none of it was available in emergencies or during natural disasters. In addition, Congress could inspect neither the activities nor the budget of the civil defense part of FEMA.

In 1985, when the Justice Department prosecuted FEMA for cronyism in awarding contracts, fraud, and mismanagement, the head of FEMA, Louis Giuffrida, was forced to resign. The organization continued to ignore natural disasters, and when disasters came the personnel were poorly trained and funded, overwhelmed, and quite possibly inept, so that when disaster response went awry, politicians chastised the agency. Dissatisfaction with FEMA culminated in 1992 after Hurricane Andrew caused about $30 billion in damage in southern Florida, leaving 160,000 people homeless. The primitive communication system of the agency forced it to buy Radio Shack walkie-talkies in last-minute preparations, while the state-of-the-art system FEMA had paid for remained unavailable. In the midst of the chaos, President George H.W. Bush replaced the FEMA director Joseph Allbaugh and ordered Andrew Card, the secretary of transportation, to take charge of the recovery, calling in federal troops to assist. In 1993, the General Accounting Office pointed the finger at FEMA for failing to prepare states and localities for the great demand for food, water, transportation, medical care, and law enforcement, and for failing to reduce the vulnerability of the dense south Florida population. FEMA's poor performance in response to Andrew was allegedly enough to cost Bush reelection.

The agency's new director, James Lee Witt, was one of the many "friends of Bill" who accompanied Clinton from Arkansas to the White House. Witt had never attended college but had substantial experience in emergency management and extraordinary political skills. Hinging upon a battery of reforms suggested by academics and professionals, Witt successfully lobbied Congress and the president for patience and support, convincing even the most skeptical members of Congress that FEMA could work to their advantage if it provided constituents affected by disaster with an immediate and effective response for which politicians could receive credit. Some national security functions were eliminated, and many positions that had made FEMA a dumping ground for political appointees with little emergency management experience were annulled. Following bold promises with bold actions, Witt hired deputies with experience in responding to disasters and adopted the recommendations of two expert reports that counseled a more streamlined approach to natural disasters. Witt trimmed FEMA's Cold War inheritance and built the foundation for a legacy of hazard mitigation and crisis management. The intellectual centerpiece of the reorganization was the "all hazards, all phases" approach that deemphasized the agency's national security responsibilities while preparing for and responding to a range of natural, industrial, and deliberate disasters. During the 1993 reorganization, more than 100 defense and security staff were reassigned to other duties, and nearly 40 percent of staff with security clearances had their clearances removed. Practice reflected the organizational changes. While responding to floods in the Midwest in the summer of 1993, FEMA used mobile communication vehicles that had previously been reserved for national security. Ensuring that FEMA could respond more quickly, Witt allowed the agency to put people and equipment into place before a disaster struck. Response improved, as the agency cut much of the red tape.

Witt erected a new Mitigation Directorate to reduce loss of life and especially damage to property by encouraging people to reduce risk and vulnerability before disaster struck. Under Witt's strong leadership during the mid- and late 1990s, the morale of FEMA employees was vastly improved, cultivating the agency's relationships with external constituencies. Under President George W. Bush FEMA was about to privatize disaster response and counterterrorism rather than natural disasters. A watershed was yet to come once more, putting a spoke in FEMA's wheel.

The 9/11 attacks on the World Trade Center and Pentagon led to major changes in the U.S. federal government. Perhaps the biggest change was the creation of the U.S. Department of Homeland Security (DHS) in November

2002. The DHS consolidated organizations related to U.S. homeland security into a single cabinet via a massive reorganization, aspiring to increase the efficiency and responsiveness of government agencies in preventing and responding to future terrorist attacks and disasters that threatened U.S. security. In February 2003, FEMA was placed under the authority of the DHS along with 20 other agencies. FEMA became a component of the Emergency Preparedness and Response (EP&R) Directorate in the DHS. FEMA moved intact to the DHS, and most of its operations became part of the EP&R Directorate, whose mission was to help the nation to prepare for, mitigate the effects of, respond to, and recover from disaster. Nevertheless, after it had been consolidated into DHS, FEMA was reorganized numerous times, and some of its premerger functions were moved to other organizations within the DHS. FEMA no longer had direct congressional oversight as before; rather, it was placed under the DHS—the third-largest department in the U.S. federal government. A web of oversight committees in Congress added bureaucratic layers with overlapping areas of oversight.

FEMA lost the cabinet status President Clinton had given it, top personnel left, and the remaining employees were so demoralized that the GAO rated its morale as one of the lowest of any government agency. More and more specialization and expertise dwindled away as both directors and personnel had no prior experience with crisis management or disaster relief.

Before Katrina hit New Orleans, FEMA already considered the likely damage from a strong hurricane hitting the city to rank in the top three potential catastrophes facing the nation. Moreover, a 2004 tabletop exercise on a hypothetical Hurricane Pam hitting New Orleans pointed to some significant weaknesses in the readiness of authorities to respond. Unfortunately, a scheduled follow-up exercise on evacuating New Orleans was aborted due to lack of funding. The 121-page plan that emerged from the aborted exercise left many issues to be determined.

When Katrina struck Louisiana on August 23, 2005, response was slow, uncertain, and inconsistent. Local government units were overwhelmed with the magnitude of the disaster. After the levees had broken, Louisiana Governor Kathleen Babineaux Blanco did ask for additional resources from the federal government, but regardless of the chaos, she refused to declare martial law or a state of emergency. The governor also declined a proposal from the White House to put National Guard troops under the control of the federal government. Public agencies were unable to stabilize local conditions or mobilize resources to get immediate assistance to

disaster victims, thereby producing anomic conditions and a general break-
down of the social order. Throughout the disaster, state and federal
agencies worked independently under their own initiative, sometimes at
cross-purposes. Even before Katrina struck, FEMA's director, Michael
Brown, had planned to resign from FEMA as he had been exhausted by
turf wars within the Department of Homeland Security. Several congres-
sional committees investigated FEMA's performance. Following a thorough
questioning by a House panel, Brown resigned.

The Katrina calamity reformed emergency management. Under the
Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina
Act), FEMA has been required to establish a National Preparedness System
to guarantee that the nation has the ability to prepare for and respond to
disasters of all types, whether natural or man-made, including terrorist
attacks. Greater responsibilities have been vested in individuals and com-
munities based on the premise that resilient communities that can quickly
recover from a disaster begin with prepared individuals and hinge on the
leadership and engagement of local government and other community
members. FEMA's Citizen Corps and partner-program officials encourage
state, local, regional, and tribal governments as well as private and nonprofit
community-based organizations to establish and sustain local Citizen Corps
Councils and partner programs through federal funding for local efforts.
Since FEMA had been stripped of many of its functions and authorities,
FEMA officials had their hands tied and could offer locals nothing but
advice when Katrina was running rampant. The Post-Katrina Act transferred
many preparedness functions and mission responsibilities back to FEMA.
Legislation has strengthened centralization with respect to emergency
management and national security, threatening historical federalist rela-
tionships. Presidential authority, for instance, to use the armed forces for
domestic purposes such as natural disasters, public health emergencies, or
terrorist attacks has been expanded. Legislation has given the president
power to call the National Guard into national service even though the
National Guard was traditionally under the jurisdiction of state governors,
but also provided municipalities, communities, and individuals with neces-
sary resources to cooperate, take action, and master their own fate.

A report of the General Accounting Office found that although FEMA
has improved its management of disaster-related resources, financial man-
agement has been arbitrary and inconsistent in terms of cost estimates
because of a coding system that has assigned a simple code to every disaster.
Such one-dimensional coding has rendered learning from previous expe-
rience impossible. The lore concerning what works best in both planning

for and mitigating the consequences of disasters on the scale of Katrina has grown exponentially, leading to some very clear directives for both policy and practice. The roadblocks to further progress have been more often political and cultural rather than resource-based. Efforts need to be extended beyond resource delivery and management to include political, cultural, and social intervention. The post-Katrina wearisome recovery has been imputed, inter alia, to the notorious style of politics and cultural elements of Louisiana. With regard to the human factor, politics, culture, ethics, self-interest, and protection of one's scope of influence above rational choice pose a challenge in advancing the effectiveness of disaster management.

Internal Security: Enforcing Law and Order

Maintaining order and safety within a territory has been a public task for millennia. Initially this was done by means of the military; most polities had very few officials whom we would identify today as "police." Well into early modern times, police were represented in an official who is similar to a sheriff. Sometimes he had a few deputies; more often citizens were asked to help out in case a criminal needed to be caught (think of the posse). The professional police force started in the 1830s in England, and became widespread in the Western world from the late nineteenth century on as part of the government response to industrialization, urbanization, and rapid population growth. Police forces were initially modeled in the command-and-control style of the military, but gradually became more civilian oriented. This is especially visible in the emergence of community policing that aims at involving citizens and other nonstate actors in the coproduction of security. With regard to the cases in this section, Colombia has introduced community policing, but it is not fully developed yet. South Africa introduced community policing in the mid-1990s, but it is not quite engaging citizens in securing their own neighborhoods. A trend anywhere on the globe is the professionalization of police forces, making them distinct from the military.

The UK case in this section is focused on the prison system, which is very much a part of domestic policing policies. As with standing armies and police forces, the prison system is the creation of modern times. In early modern times, incarceration was only temporary until trial. Lengthy prison sentences are a feature of the modern world, and so is the prison system. Generally, prisons are government run as an expression of the state's monopoly over the use of violence. However, and following the United

States, the United Kingdom has experimented with partially privatizing its prisons, but the outcomes are not satisfactory (as in the United States). Canada has two private prisons, and Israel tried to introduce them in 2004, but it was struck down as unconstitutional in 2009. Generally, prison guards and probation officers have professionalized as well.

Colombia: A Quagmire of Guerillas, Drug Cartels, and Paramilitaries—Demilitarization Bogging Down

To many states in Latin America police reform was considered a sine qua non to economic development and the quality of democracy. It had been challenged by a legacy of military control over police forces and by sky-rocketing crime rates that caused many police forces to revert back to repressive measures (unless stated otherwise, this section is based on Frühling, 2003; De Francisco, 2006; Llorente, 2006; Ruiz Vásquez, 2012; De la Torre, 2008).

The objectives of police work include crime prevention, immediate response to incidents that directly threaten the security of citizens, investigation of crimes and accidents in a given jurisdiction, and traffic control. In Colombia, regardless of its strong democratic foundation, society and the government have implored the police to exceed these objectives against a backdrop of harsh realities with armed conflicts with guerillas, paramilitaries, and drug traffickers.

The Colombian police force has its origins in the National Police Corps founded in 1891 under the Ministry of Government to maintain law and order in Bogotá. Merely two years after beginning its duties there had been a popular uprising against this nascent police force that even destroyed some of its facilities. The stage had been set for the disdain, fear, and apprehension that Colombians felt about their police force for years. After the force had been established, the first decades were punctuated by periods of partisan conflict, the most notorious of which was the Thousand Days War (1899–1902). From 1930 to the end of the 1950s the National Police was directly involved in the conflict between the Liberal and Conservative parties, condemning it to be an instrument of interparty conflict. The bloodshed culminated in the period known as *La Violencia* (the Violence) from 1948 to 1953: Once power changed hands from one party to the other, there would be a massive purge of opposition police officers and a recruitment of fellow party members.

Absent sufficient resources to expand law-enforcement coverage into Colombia's many regions, police forces were locally forged in the Colombian

departamentos (provinces) and municipalities while answering to governors and mayors and operating in relative autonomy from central government. During the dictatorship of the military government headed by General Gustavo Rojas Pinilla (1955–1958), the police force was placed under the Ministry of Defense (at that time, the Ministry of War), furnishing it with new personnel, most of whom were drawn from the Army and were untrained.

Since the cessation of the mid-twentieth-century violence, Colombian society has been preponderantly civilian in nature. The subordination of Colombia's armed forces to civilian control has been the product of the role the army assumed during *La Violencia* rather than of the military's control of the government. During the military government, the army took control of the police force and militarized its organization and training of personnel; in that context the police force was recast as a centralized public entity. Although Colombia's first police school had been inaugurated in the 1930s, profession-alization only took off once the force was consolidated as a national-level service. The career ranks of high-ranking and midlevel officers were reor-ganized in the mid-1950s based on military norms. One objective was to give high- and midranking police officers parity with army officers.

As far as 1991, both the armed forces and the National Police were led by the top army general under the auspices of the Defense Ministry. The *Frente Nacional* (National Front), which was a bipartisan agreement in force from 1958 to 1978 enabling Colombia's two traditional parties to alternate in power at the national and regional levels, pacified the country. This allowed police units to consolidate under a single national force and as of 1965 for the first time a high-ranking police officer rather than an army general was appointed as its director. Between 1964 and 1966 the judicial police was set up. Given the rise of multiple guerrilla groups in Colombia since the 1960s, it was arduous to qualify the police as a law-enforcement organization. The capacity of the police to support the army in its mission of national pacification in rural areas was more important than fortifying the National Police as an organization that was supposed to tackle escalating urban crime.

Throughout the 1980s, the National Police grew in size and intensified its urban presence to face the growing rates of urbanization and attendant crime in Colombia's major cities. Endeavoring to make the police more responsive to the urban public, metropolitan police departments offered law-enforcement services in Bogotá, Medellín, and Cali—Colombia's three principal cities. CADs (*Centros Automáticos de Despacho*), automated dispatch systems, were introduced in these and other large cities to modernize the handling of emergency calls and speed up the dispatching of patrol cars. CAIs (*Centros de Atención Inmediata*) were forged first in Bogotá and soon in

almost all Colombian cities; these centers, which deployed officers in posts at multiple points around a city, were explicitly initiated by the National Police to improve community relations through decentralization of basic police services.

In April 1981 an antinarcotics unit was created in the Operations Bureau of the National Police, assigning it to lead responsibility in the fight against drug trafficking. The unit received U.S. support, cautiously limited to a few teams and sporadic training courses. The Virgilio Barco administration (1986–1990) had witnessed the escalation of the armed conflict as the National Police targeted hit men and vice versa, and drug traffickers on their part confronted guerillas. Drug traffickers took aim not only at those associated with guerillas, but also at those who represented leftist or progressive positions, an exemplar of which was the mass murder of the members of *Unión Patriótica,* the leftist coalition. Later on, targeted murder extended to any who opposed the interests of the drug traffickers including journalists and politicians. In April 1989 a Special Armed Unit (*Cuerpo Especial Armado*) had been erected under the direct supervision of the National Police and was vested with the power to dismantle hired assassins. Those gangsters were nonetheless one step ahead. The government reacted by reinforcing the National Antinarcotic Bureau, which had evolved out of the original unit in the Operations Bureau. By and large, the government was improvising, attending to circumstances as they unfolded rather than planning strategically, neither with short-term goals nor with long-term ones.

In 1991 Colombia promoted a new, more democratic civil and participatory constitution. The new constitution conceived of the National Police as a standing armed civilian body that reports to the national government and is part of the *Fuerza Pública* (that is, the Armed Forces and the National Police). The 1886 constitution established the army as the nation's sole armed body in existence. The new provision granted legal status to the National Police as well at a time when it was institutionally paralyzed and waned in popularity after a Chief of Police and several underlings had been linked to the drug cartels and formed bands of thieves and kidnappers. Meanwhile, between 1983 and 1992 homicides in Colombia more than doubled, rising from a rate of 32 to 79 homicides per 100,000 inhabitants. Public criticism of police involvement in illicit activities also grew as police gangs formed in several cities to carry out armed robberies and "social cleansing"—a euphemism for a selective killing of criminals, prostitutes, beggars, and the mentally ill.

The César Gaviria administration (1990–1994) forged a new Search Bloc (*Bloque de Búsqueda*) in the form of a coordination mechanism to make

components of crime-fighting agencies pull together while setting forth the National Strategy against Violence (*Estrategia Nacional contra la Violencia*); the Public Prosecutor's Office, which had been created by the 1991 constitution to direct criminal investigations, was to harmonize with the armed forces, the National Police, and the administrative office of Security (the intelligence agency under the aegis of the presidency).

The Gaviria administration laid down the first reform package in 1991 that called upon civilians to be more active in the design of public policies on national defense and citizen security including related planning and allocation of resources. The National System for Citizen Participation in Police Matters was purportedly designed to allow citizens from all strata of society to provide input on police matters, which would in turn assist police officials in guiding and directing their rank-and-file police officers. For the first time citizen security and national security were severed following a presidential discourse according to which the government finally concocted a strategy that clarified the state's objectives and its internal security policies as well as a scheme to develop the security forces. A civilian police commissioner was nominated to preside over an external office and provide civilian oversight over the National Police. The appointment in 1991 of a civilian defense minister after 40 years of army control over this office served likewise to wrest the police from the military line of command; it vested the police with greater operational autonomy with respect to the army, which was supposed to wield "operational control" over the police only in cases authorized by the minister. The police also gained greater control over their budget, which had formerly been allocated by the military as part of the overall defense sector.

Various regulations paved the way for greater mayoral and gubernatorial discretion and control over policing within jurisdictions, thus decentralizing police services based on local-level security priorities. A new professional career track was engendered in order to shrink the hierarchical command structure and increase the ratio of supervisors to rank-and-file officers. Cadets who were trained during the *Frente Nacional* (1958–1978) became police chiefs during 1990. From then on, the police force was headed by a Chief of Police who himself was a police officer, and was managed by police officers who had been trained as police, by police, and in police academies, so the police force was able to forge its own institutional identity and interests. Although the reforms laid down by the first reform package have never taken hold, they did lay the groundwork for successful reform efforts later on, and contoured the government's new approach to management of public safety and citizen security and the role of civilians therein.

During a second major attempt to reform the police, most of the 1991 provisions were reasserted and some new ones were ushered in, aiming to restructure the National Police by creating three separate police forces: urban, rural, and criminal-oriented organizations as well as a separate investigation unit. The urban force would have possessed a more civilian profile, while the rural force would have had more of a military profile and get specialized military training in order to operate effectively in regions where guerilla insurgents were based. The main goal was to create less of a military-style command structure, one that was in keeping with international police trends. This restructuring never materialized as the urban orientation that the police had been developing since the 1980s remained predominant. Measures aimed at expanding civilian control over the police fell short of expectations. Measures to strengthen government oversight never got anywhere either. The suggestions sparked resentment among the police leadership, since recommendations had been made by external commissions from outside the National Police organization. Moreover, most high-level and midgrade officers refused to embark on the new career path, since it would have negatively affected their prestige and privileges; thereby they remained in the old path.

The presidency of Ernesto Samper (1994–1998) was plagued from the outset by allegations of bribery from drug cartels, as a result of which Samper was unable to continue with his predecessor's efforts to assert civilian control over the police. However, he did appoint the General Jose Serrano to head the police. Serrano was renowned for leading an aggressive and ultimately successful campaign against drug cartels. After the Medellin cartel had been vanquished in 1993 he also gained credibility with the U.S. government. In 1995 he applied a presidential decree to purge more than 8,000 police officers who were thought to be involved in illicit activities.

Serrano's reform efforts included several smaller initiatives that fell under the umbrella of cultural transformation of the police. This aimed at giving the police a more civilian-oriented style with better leadership, an emphasis on improved management, and better personnel training in line with the notion that citizens were "clients." Serrano introduced police surveys intended to gauge police efficiency in areas of response and crime control, and also serve as a method for the police to improve in areas deemed deficient. Serrano also initiated a neighborhood watch program adopted from a British model. The Colombian model was named *Frentes de Seguridad Local* (Local Security Fronts) and *Escuelas de Seguridad* (Security Schools). The community fronts went from 2,700 in 1995 to more than 6,800 by 2001. In Bogotá and Medellin, two of the country's three biggest

cities, this endeavor appeared to be producing positive results in terms of crime control and a positive image for the police.

Probably the most critical part of this reform effort was the development of a strategic planning board that consisted of all the top commanders from every department. It was to meet on a regular basis in order to measure progress and plan for the future at a regional and national level. The police developed contracts with various Colombian universities to teach top commanders courses in a more civilian-oriented form of leadership and management. Serrano envisioned a more horizontal relationship between senior commanders and mid- to low-ranking officers whereby assignments would hinge on ability, but senior officers resisted the venture to replace the quasi-military steep structure.

Andrés Pastrana's administration (1998–2002) launched Plan Colombia with U.S. support. Grasping the degree to which drug trafficking could affect society, the time had come not only to dismantle drug-trafficking organizations, but also to resolve the illegal crops problem. Thousands of hectares have been destroyed since the initiative took off. The fumigation policy strengthened the National Police force in its confrontation with the drug traffickers as it added to its capacity to tackle crime organizations.

A special commission was appointed in late 2003 by the minister of defense to analyze the functioning of the internal and external police control mechanisms and to make recommendations to enhance them. The commission imparted its concern for the lack of a comprehensive police integrity policy that should be the motor of any reform that has to do with police accountability. Serrano's assiduous measures did seem to bear some fruit because when compared to other Colombian government institutions, the police has had the largest increase in public confidence for the past decade, with the armed forces coming in a distant second. Community policing has been going hand in hand with legal and institutional changes in Colombia as the 1991 constitution has embodied citizen participation. In accord with present-day policing trends the private sector has urged the police force to modernize its policies and improve its image. The community police program began operations in 1999 following an elaborate strategic model that included defined actions, indicators, and results to be obtained such as a closer relationship with the community, peaceful coexistence, crime deterrence, and excellence in service. The community police officers were immediately recognizable for their use of bicycles and distinctive vests. However, Colombia has never fully implemented a real community police model leading to a transformation of organizational structure, conduct, and culture.

Since 1996 the new community police force has adopted the Local Safety Fronts program, which impelled residents to organize within their neighborhoods, install alarms, and exchange telephone numbers in order to alert each other and the authorities when suspicious activities occurred in the neighborhood. By the same token this new division assumed the previous "safety schools" program to train neighborhood leaders and residents about organization and community involvement as it relates to block security. In 2006 there were 9,686 Local Safety Fronts in Bogotá, amounting to 15 percent of the city's residents and 11 percent of its households. However, the majority of Safety Fronts and police representatives have not come together on a regular basis to tackle security issues.

The community police force in Colombia has been one of the largest in Latin America, but it has been insufficient to fully establish a community model. Perhaps the strongest aspect of community police in Colombia has been its officer training, taking place in both private and public universities. However, this program met with opposition by mid-ranking police officials who wanted the training to be carried out as before, in traditional police academies. Certain sectors within universities resisted the training program as well because they did not want their students mixed with the police either by reason of differences in social status at private universities or due to an aversion to an institution that had historically repressed student demonstrations at public universities.

The community police has had to take on duties unrelated to activities initially planned for it. High-ranking officials have always used the community police to cover gaps in service due to lack of personnel, so the community police have been used to recruit paid informants and in the war against terrorist activities (especially guerilla ones). Inasmuch as initiatives whereby citizens protect themselves have been commendable, such undertakings have had a sad history in Colombia with the formation of self-defense or paramilitary groups.

The Colombian police force has become ever more independent of all types of ties and as a result more difficult to control. It was difficult to implement a Chicago-style community police force in Colombia because it required citizens and neighborhood residents to oversee and evaluate police actions in a way that might have limited the autonomy of mid- and high-level officials. High-ranking officials' fear of losing power to the discretion of their subordinates, the lack of acceptance by other beat officers who considered themselves tough compared to what they believed to be a soft type of policing, ineffectiveness in coping with high crime rates, and insufficient neighborhood and area coverage were among the factors

that foiled the community police model in Colombia. Institutional centrali-zation, on the other hand, has prevented beat officers from acting autono-mously within their sectors to create their own programs. In an attempt to resolve more pressing problems, the community policing has been some-what marginalized: The National Police has suffered a reduction in human resources and budget due to internal conflicts, narcotics trafficking, and organized crime. Regardless of cutbacks, it has had to assume numerous additional duties such as protecting important people, all of which has limited its potential scope of action.

Community policing has become the face of the police when it comes to public activities of a more convivial nature such as building bicycle paths and schools for underprivileged children in the unauthorized squatter neighbor-hoods in several Colombian cities, mainly in Bogotá. Local authorities have tended not to intervene in these areas where charismatic officers have worked in conjunction with private businesses to install basic public services, precisely because these neighborhoods have not been legally recognized by the city. Although Colombia has failed to follow community policing in its entirety, the model did gain some ground. Unlike the paralysis of previous decades, the Local Safety Fronts and similar initiatives involve the citizenry in various undertakings whereby they can join forces with the police.

South Africa: Post-Apartheid Community Policing—Transmuting the Police Force to a Police Service

The oppression of Indian, Chinese, and African workers in the early 1900s and sporadically of white industrial workers in 1913, 1914, and 1922 by the South African police embodied the practices of police force acting on behalf of an aggressive imperial capital (unless stated otherwise, this section is based on Brogden, 1989; Van der Spuy, 1989; Malan, 1999; Marks and Fleming, 2004; Marks and others, 2009; Rauch, 2001; Masuku, 2005; Phillips, 2010). In no other British dominion was policing so remarkably an agency of one particular class acting against its opponents. Absent distinction between police and soldiers like nowadays, policing was hap-hazard and uneven prior to the formation of a national police force in 1913. Dual-purpose units that carried out both military and police tasks were the rule rather than the exception. The Frontier and Mounted Police (FAMP), for example, was such a dual-purpose unit policing the outlying rural districts of the Eastern Cape. Frequent border disputes alongside frontier wars and black "risings" prevailed throughout the Eastern Cape, lending support to the military (as opposed to the police) function of the FAMP.

From the eighteenth century up to the early 1990s, policing in South Africa was embedded in a web of institutional practices whereby the imperial state legitimated its sovereignty over the colonial territory. As such, it had operated as an internal army of occupation acting mainly on behalf of the white incomers and their descendants against the indigenous population and against nonwhite migrant labor. After the war in 1945, a concerted effort to reconstruct the public service as a whole subsumed an ambitious three-year plan to upgrade the South African Police (SAP) force. The SAP had been taking orders from the government of the day and from 1948 onwards, when customary segregation came to be cast in a rigid legal form, it became the enforcement arm of the apartheid regime.

One of the most visible symbols of the grand apartheid was the creation of the homeland system (1960s and 1970s) that segregated black South Africans into ethnic groups, assigned each group a small piece of land, and created some form of administration for each homeland. The "grand apartheid" made sure there would be no black South African citizens by forcing all nonwhite Africans to exchange their citizenship for that of a so-called "independent state" based on racial and ethnic segregation. The "independent" homelands were entitled to issue passports, create defense forces, attempt "foreign affairs," etc. These self-governing homelands and independent states deployed bodies of armed men to maintain law and order. As primary enforcers of discriminatory measures, the police became the immediate symbol of oppressive rule.

The incredible democratic transition in South Africa has required significant police transformation even though it did not require a UN peacekeeping presence in the field. At the time of Nelson Mandela's release from prison in 1990, there were 11 police forces in South Africa, each constituted under its own piece of legislation and operating within its own jurisdiction. The largest force was the SAP with approximately 112,000 members geared toward the needs of the apartheid order; the other 10 were the "homeland" police forces. Street-level policing was conducted in a heavy-handed manner with bias against black citizens and little respect for rights or due process. Criminal investigations were largely reliant on confessions extracted under duress, and harsh security legislation condoned various forms of coercion and torture. Policing techniques were outmoded, partly because of the international campaign that beset the apartheid government. The (new) Interim Constitution for the Republic of South Africa which came into force on April 27, 1994, set up a single national police service out of 11 agencies in operation, democratizing police agencies.

The process of changing from a police force to a police service was formally started in 1995 with the appointment of a national police commissioner to head the SAPS (South African Police Service) along with a new South African Police Service Act that has provided for the establishment, organization, regulation, and control of the SAPS. The government's major national policy framework, the Reconstruction and Development Program (RDP), also bore on the goals of police transformation. With "peace and security for all" as one of its six rudiments the RDP determined that the police must be made more representative of the people, more attentive to human rights, and more responsive to the communities they serve.

Beyond a concern with effectiveness and efficiency, international assistance to the police pursued normative transformation by imparting and inculcating international criminal justice standards. It has pushed for reform of internal management practices coupled with a fair amount of politically neutral technology transfer. Unlike regime police, which are primarily concerned with what government requires, democratic police are supposed to respond to citizens' needs and be held accountable for their deeds and omissions through multiple political and civil mechanisms.

The postapartheid South African police set in motion an institutional change in terms of the relations of police to government and other social structures, affecting thereby the purpose, functions, control, and accountability of the police. Venturing to demilitarize and civilianize the new police service, "community-oriented policing" became the cornerstone of official policy in the democratization process. Leaving apartheid practices behind, community policing was seen as a way to improve the relationship between the police and the public, making sure that the police represented and served the interests of the public in their daily work.

In 1997 the Department of Safety and Security published its formal policy document entitled "Community Policing Policy Framework and Guidelines," presenting community policing as a collaborative, partnership-based approach to (local-level) problem solving. Acknowledging that the objectives of the police can only be achieved through a collaborative effort of the police with other government organizations, structures of civil society, and the private sector, community policing was also conducive to bottom-up governance and civic participation as promised by the new democratic government. Community Policing Forums (CPFs) that had been stipulated in the constitution were established at all but 21 of South Africa's 1,221 police stations by 1997, but the transformation had not always gone smoothly as demonstrated by the Public Order Police Unit.

The African National Congress-led government decided amidst much controversy to maintain a separate, specialized public order unit within the newly transformed SAPS. Undertaking to supplant the notoriously brutal Riot Unit (which came to be known as the Internal Stability Division [ISD]), the unit had been renamed the Public Order Police (POP) unit and became the largest specialized unit in South Africa. New training was introduced mostly in terms of operational procedures, tactics, and equipment. Insignia were changed and affirmative action policies were advocated in an attempt to rectify racial and gender imbalances within the unit. The POP unit was expected to transform itself from a highly militaristic, reactive, and repressive policing body to one that was civilian, communal, service oriented, accountable, nonpartisan, and committed to human rights values. The unit had to change its style from being repressive to tolerant, from reactive to preventive, from confrontational to consensual, and from rigid to flexible in line with international trends in public order policing. Contrary to expectations, structure and command remained similar to those of military organizations. The POP Unit was expected to embrace community policing in terms of both style and philosophy, to consult with community groups about public order problems to jointly decide on ways of managing crowds and public disorder, and provide ongoing reports on operations. No longer could this unit operate unilaterally in response to police-defined problems. New public service legislation stipulated participatory management; the development of performance indicators and evaluations of individual progress and contributions were viewed as integral to effective human resource management and development strategy. Regardless of much ado, behavioral change has been perfunctory. Changes have been slow and difficult mostly in the area of labor-management relations that remained rather autocratic. Evaluation of performance has been ineffective, motivating members only to a limited degree.

Traditional police resistance to change and authoritarian, hierarchical, nonconsultative, and nonparticipative public service ethos, coupled with an inflexible, yet irresolute and uninformed leadership, drove a wedge between top management and rank-and-file members who felt unable to contribute to decision making. Since members felt unsupported in the change process, their commitment to the unit waned. Management practices that remained remarkably unreconstructed failed to cultivate participatory management and directive leadership. Although corporate and new public management practices have had much to offer police organizations, the nature of police alongside entrenched normative schemas with regard to discipline stood in the way.

Marks and others (2009) have pointed out that community policing has eventually become a dead letter. In keeping with global trends, the community policing narrative has become focused almost entirely on ways to mobilize nonstate actors to legitimize and increase the effectiveness of the police, whereas community policing has been immanently about bringing the state closer to civil society in coproducing security. Partnerships and joint working agreements have been made with private security companies. The police have looked upon this burgeoning industry as their "natural" ally and partner, whereas nonstate, more informal civil society groupings have been regarded more as potential threats to security and less as contributors to it.

Police transformation had also to do with improved oversight and accountability to ensure that the organization adhered to the constitution and policies of the democratically elected government. Democratic structures built around explicit values of good governance, transparency, and accountability have superseded apartheid institutions. The Independent Complaints Directorate (ICD), a civilian-run state structure, has been vested with the responsibility to investigate all cases of death inflicted by police actions or while in police custody, and any other allegations of criminality or misconduct brought to it by a member of the public. Although funded by the national Department of Safety and Security, the ICD has been independent of the SAPS, which was required to present an annual report on its performance to the minister of safety and security. A number of other state structures that have been tasked with upholding the Bill of Rights subsumed in the constitution have been able to play an indirect oversight role with respect to the police. The Human Rights Commission, the Commission of Gender Equality, and the public protector have addressed complaints concerning problematic police conduct. A further state structure called the Public Service Commission has researched and evaluated the extent to which the SAPS has adhered to key government policies.

Britain: Integrating Offender Management—Performance, Contestability, and Amalgamation

The Prison Service of England and Wales was part of the Home Office. While the Home Secretary was ultimately responsible and accountable to Parliament for the functioning of the service, one of the junior ministers of the Home Office was responsible for the Prison Service. Prior to 1990 the Prison Board was the strategic layer connecting the political layer and the prisons. It consisted of the director general, his deputy, four regional

directors, four headquarters directors, and two nonexecutive directors (unless stated otherwise, information in this section is from Resodihardjo, 2009; Nossal and Wood, 2004; Flynn, 2007; Nathan, 2003; McLennan-Murray, 2011; Talbot and Johnson 2007; Talbot and Talbot, 2013; Lawrie, 2011; Robinson and Burnett, 2007; Hough and others, 2006; Faulkner, 2005).

Despite its avowed neoliberal stance the Conservative government of Margaret Thatcher that had come to power in 1979 was reluctant to privatize prisons. A select parliamentary committee appointed to look into the state of the British prison system visited the United States in 1986 after taking up the idea from a 1984 report by the Adam Smith Institute (ASI). In view of severely overcrowded facilities, the committee issued a report in 1987 proposing an experiment whereby private firms would be allowed to tender for custodial facilities and for remand centers in particular. Meanwhile, congestion increased apace in prisons, many of which had been a relic of the bygone Victorian era.

Those suggestions had been on the back burner until 1990, when a riot erupted in the Manchester Prison colloquially known as "Strangeways." The £70 million repair bill was only the beginning; by the time the Strangeways riot ended on April 25, 1990, disturbances had broken out in more than 20 prisons. Order was restored only after three people had lost their lives, 133 inmates and 282 prison staff had been injured, and the costs, including those of keeping prisoners in custody in police cells, exceeded £100 million. The subsequent Criminal Justice Act of 1991 set the scene for partial privatization, with regard to which Angela Rumbold, then prisons minister, said: "If, and only if, the contracted-out remand center proves to be a success, might we move toward privatization of other parts of the prison service." (quoted in Nathan, 2003, pp. 166–167)

The Woolf Report delved into the way the service was organized and suggested some rearrangements while balancing justice, control, and security; it placed the blame for the revolt on inadequate staffing and facilities as well as on poor management. The two mechanisms espoused were the managerial solutions of preference recurrently assumed by Conservative governments: market testing and agencification. In 1992, Strangeways was market tested as its management was put out to tender. In April 1993 HM Prison Service and the Scottish Prison Service were launched as "Next Steps" agencies; in other words, executive agencies standing at arm's length from their parent ministry, the Home Office.

The first contract to manage a prison was awarded to Group 4 Remand Services Ltd. for the management of the newly built Wolds Remand Prison,

which opened in April 1992 for 320 adult prisoners. Private companies were invited to run new prisons without a counterbid from existing employees of the Prison Service. By 1996 there were 6 private and 140 public prisons in Great Britain; by 2003 the number of privately operated prisons rose to 10. The success of the market testing caused a change of heart amid the previously tenacious Prison Officers' Association. Since the New Labor's landslide victory in 1997 the Prison Service has had some success in tendering; it retained, inter alia, the Manchester prison and even won Blakenhurst, the flagship of the successful private sector. Over the past two decades prisons have been variously governed: Some have been publicly owned and run with or without Service Level Agreements (SLAs—the public variant of contracts); others have been privately owned and run; and, last, there have been a few Private Finance Initiative (PFI) prisons. Both PFI contracts and SLAs have tended to be as elaborate as possible, specifying desired prison regimes as well as outputs and outcomes such as weekly hours of purposeful activity (work and education) per prisoner and escapes.

According to the National Audit Office (NAO) and most research the private sector prisons in Britain have been neither better nor worse than the publicly owned and run establishments: Both sectors have displayed a complete spectrum from excellent prisons to failing ones. Ten years into reorganization and market testing, reports and inspections have hardly found any area of prison management not in need of improvement since standards, regimes, and accountabilities have been found wanting.

The culture of performance has compelled all prisons including the smallest ones to commit disproportionate amounts of resources into having secretariats/support units to collect, collate, manage, and analyze performance data therefore falling short of prisoners' needs, since those have been seen by HQ via the performance data, as opposed to the reality of prisoners' experience. The chief inspector of prisons (HMCIP) pegged this phenomenon as the "virtual world."

All in all, no other European nation has commissioned privately financed, designed, built, and operated prisons or contracted out the custodial functions in a prison. In terms of the number of private prisons, the United Kingdom is second only to the United States. In addition to private prisons the United Kingdom has privately operated secure training centers for young offenders, immigration detention centers, prisoner escort services, electronic monitoring programs, provision of a wide range of noncustodial services in publicly run prisons, as well as major programs for privately financed, designed, built, and operated court complexes, police complexes, and probation hostels.

The Probation Rules of 1907 laid the foundation of the ethos of the service to "advise, assist, and befriend" offenders. Probation work rested on social work ideas about intervening in the lives of offenders to help them to avoid crime. It was a highly localized service run by probation committees, and in 1999, it was somewhat of a patchwork consisting of 54 services. The qualification for those working in the service was a social work one, and officers worked in a relatively autonomous way with a professional relationship with the courts. Over the years, the Home Office had attempted to assert control over the service, a matter that became more important when the government decided to change the role of the Probation Service. The 1988 Green Paper *Punishment, Custody, and the Community* and the Criminal Justice Act 1991 made it clear that not only probation was to become a "punishment in the community" (rather than a social work-based process) but also a punitive noncustodial sentence in its own right, not an inferior alternative to custody.

From the outset, the ascendancy of the New Labor government had witnessed the amalgamation of many previously scattered public entities. In 2000 the Labor government "nationalized" the Probation Service for all intents and purposes, consolidating the Probation Services into a national service for punishment in the community under the auspices of the Criminal Justice and Court Services Act. Forty-two Probation Boards succeeded the erstwhile 54 probation committees within The National Probation Service for England and Wales. Those newly erected boards were also made coterminous with police authority boundaries, prosecution, and courts services. The (National) Probation Service (NPS) became a national service with its entire funding transferred from central government, a director general in the Home Office, and all the members of probation boards appointed by the home secretary. Regardless of talks about a matrix model of management and accountability and of the NPS's National Probation Directorate (NPD) as the hub of a wheel rather than the apex of a hierarchy, the NPD became the de facto headquarters of an unambiguously top-down, command-and-control structure.

The government was very clear that probation represented law enforcement rather than social work because the public primarily wanted offenders punished and made to make reparation for their crimes. NPD produced a suite of national targets and indicators that would compel probation agencies to deliver what the public was said to want and in particular rigorously enforced compliance with the requirements of orders and postrelease licenses. The performance data were reported vis-à-vis the centrally prescribed targets in a "weighted score card" to produce league

tables of probation areas. Although resources and activity tended to be directed toward what got measured and this was often processes rather than quality or outcomes, overall this approach succeeded in creating more consistent and improved standards of work such as increased levels of contact with people under supervision and universal enforcement action against those who failed to comply.

At the end of 2003, just two years after the establishment of the NPS in England and Wales, the Carter report (a Correctional Services Review commissioned by the Cabinet Office Strategy Unit) suggested consolidating the Probation Service and the Prison Service into a single National Offender Management Service (NOMS). This was to ensure the "end-to-end management" of offenders, regardless of whether they were given a custodial or a community sentence. Those twin services had hitherto been very poorly coordinated despite dealing with very similar "clients"—that is, offenders—so the Home Office responded with a document of their own endorsing the Carter Review and stating that NOMS would be inaugurated within months.

The 2003 Criminal Justice Act has laid the groundwork for forging the new NOMS along the lines of the Carter report. The new act has redefined the purposes of sentencing pursuant to the policy position that the New Labor government has been advocating for some time, endeavoring to stop the situation whereby offenders fall into the gap between the services. The stated aims were to use resources more effectively and reduce reoffending rates, and at the same time to increase public confidence in the penal system and in the criminal justice system as a whole. This was by no means a marriage of equals: the Probation Service was less than one-tenth the size of the Prison Service when they merged. Apart from amalgamating the Prison and Probation Services into a single service, the commissioning and providing functions within that service were to be severed. Amalgamation took place as of June 2004. Below the chief executive, commissioning was supposed to be the responsibility of a national offender manager working through 10 Regional Offender Managers (ROMs) appointed for each of the nine regions in England as well as one for Wales. Those 10 ROMs were supposed to take over the commissioning role from the existing 42 probation boards. A contestability agenda has been ushered in, officially defined as being about challenging existing suppliers to demonstrate that they continue to offer the best value for money to the taxpayer. Eventually, NOMS has introduced a partial purchaser-provider split in which individual prisons and probation service areas might be put up for competitive tendering.

Those short-lived arrangements were totally ineffective, since ROMs had no control over the budgets for prisons or probation areas; they just

managed to raise the level of bureaucracy and to set prison area managers against ROMs. Three home secretaries left the Home Office between 2004 and 2007 under less-than-optimal circumstances (Blunkett, Clarke, and Reid). Following the departure of Reid in 2007, the government had been reorganized, while NOMs became part of the newly formed Ministry of Justice (MoJ).

The Offender Management Act 2007 (OMA 2007) has tipped the scales in favor of public protection even more, furthering services to victims rather than focusing on offenders. Multi-Agency Public Protection Arrangements (MAPPA) have transformed the way local agencies and particularly probation and police worked collaboratively and effectively to manage the highest-risk offenders in the community. Probation liaison teams provided information and support to victims of heinous crimes.

Those developments reinforced the identity of probation amongst its own staff and other agencies as a service working for the "law-abiding majority." For all of its history up to the mid-1990s there had been a culture of autonomy for probation officers, which had been derived from their historical role as officers of the court with a direct personal accountability to sentencers. The imperative to hit government targets and to deliver only standardized programs of supervision meant that such autonomy was no longer acceptable. Managers began to set clear objectives for their staff based on targets, national standards for practice, and record-keeping requirements, and to monitor their compliance with them. The right to manage has been established so that staff are now held properly to account through formal disciplinary and competence processes if necessary.

By April 2010, the 42 boards were reconstituted via the OMA 2007 as 35 trusts. Those nondepartmental public bodies, arms-length organizations sponsored by the MoJ, deliver services under contract to the secretary of state; they resemble the pre-2001 committees in the sense that they are semi-independent local bodies but with the advantages of a modern service delivery orientation in their ethos, organization, and processes. The OMA 2007 has removed the monopoly provider status of probation trusts. The secretary of state has become responsible for the provision of probation services and able to source them from any provider, which means that in future trusts may have to compete with others to deliver probation services. The payment-by-results approach mandates choosing whichever provider generates the best value for money, whether public, private, or not-for-profit. Probation has become a disciplined and outward-facing service distancing itself from its origins as a social work service for offender clients while accepting that it must demonstrate the value of what it does vis-à-vis public expectations.

The Judiciary System: One State under the Rule of Law

Next to military, police, and prisons, the judiciary is an important element in any state's system of the rule of law. The judiciary initially existed to punish violators of the law, but in modern times it increasingly has turned to mediating in conflict between citizens and in protecting citizens against the power of the state. Where the judiciary initially is a domestic, national affair, it has acquired some international, even global features. Generally, national laws have been standardized and then increasingly adapted to, for instance, international human rights standards. This is a process under way in, for instance, the People's Republic of China (see following), and has been a feature of Western countries since the early twentieth century. Especially with regard to the international and global environment governments operate in today, the United Nations (see following) has come to work in a world more and more dominated by intrastate conflicts, and has been fairly successful in containing interstate conflicts. One of these international human rights issues concerns migration, and Germany is one of those Western countries that has experienced an influx of foreign nationals. While migration is an international challenge (see Arnold, 2010), each country addresses this policy area within the national context and traditions.

The People's Republic of China: The Silent Revolution—Rationalization, Modernization, and Constitutionalization

The rhetoric of the rule of law in China is no longer a ritual formula (information in this section is based on Balme, 2005; Lin, 2003; Gechlik, 2005; Cabestan, 2005). Besides the obvious effects of self-legitimation for the regime, it produces new realities and systemic effects on both institutions and individuals. The law is there because even in a communist or so-called socialist world that shuns political and legal legitimacy such reticence is purely theoretical in the daily exercise of the law. The rebirth of the legal professions in China seems to be producing a milieu that is made up of a majority of individuals who are in love with modernity—liberals in the political sense of the term. Just as illegal practices can survive in a modern judicial system, so the judicial system of the People's Republic of China (PRC) has undergone gradual modernization despite persistent clientelist, illegal, or informal practices. Institutionalized determination has partially disqualified clientelist practices in favor of more modern procedures, endeavoring to constitute norms. Judicial reform has merely been a reflection of other profound changes, observable as much on the level

of objective social reality as on that of our understanding of these phe-nomena. Since China's opening up in 1978, the "socialist market economy" has been ripening; that "seizure of the political by the law" became institutionalized and resonated throughout the world.

During the past three decades, reform trajectories have shifted from commercial law to civil law, then through administrative law and criminal law, culminating in constitutional reform. Upon converting from a planned economy to a market economy, the relationship between individuals and government has changed fundamentally. Some PRC reformers have been interested in testing through the Hong Kong case the possibility of establish-ing in the mainland a rule of law that would stabilize society, stimulate economic development, and integrate China into the world economy without jeopardizing the leading role of the Communist Party. Whereas in Western democracies the constitutionality of the law is subject to rigorous examination, in China the lack of respect for the constitution is explained by the lack of a clear conception of the position of the constitution in the hierarchy of the normative system. Absent hierarchy of norms and a definition of the sources of the law, confusion has emerged in both organization and denomination of legal texts, administrative regulations, and decrees.

"Traditional" Chinese need for justice and equity harks back to imperial China. In the hands of government officials who enjoyed both administra-tive and judicial prerogatives in dealing with criminal cases, imperial justice was avoided as far as possible. Since the middle of the nineteenth century, Chinese law has been reformed along the lines of Western law such as the German continental-legal tradition transmitted through Japan. Though this process of legal acculturation had come to a halt for 30 years, it was resumed three decades ago, allowing various foreign legal models to compete for influence. The PRC was founded in 1949. A five-year attempt to forge a new democracy between 1949 and 1954 culminated in the inception of the first constitution of the PRC. Alongside periods of legal nihilism, the Cultural Revolution was the paroxysm of the revolutionary era. Between the middle of the 1950s and the end of the 1970s, the legal profession was practically eradicated during politically violent mass campaigns, and the law gave way to political regulations or political-administrative internal documents.

As opposed to the alternately anarchical and rigid functioning of the Maoist period, from 1978 onwards the law has become a legitimate instru-ment of public action brandished by authorities. Multiple interactions and arrangements between the spheres of law and politics and between state and society have impelled civil society actors to either take initiatives in favor

of political or economic liberalization or denounce them based on judicial rhetoric in the name of the law and its ongoing reform.

From the late 1980s up until recent years, Chinese legal reform has largely centered on efforts to enact new legislation, including administrative regulations, in various areas of the substantive law. Within the judiciary, reform has taken the form of developing a modern adversarial trial system while introducing some elementary rules of evidence. Such reforms were deemed necessary to resolve the civil and commercial disputes arising from China's transformation from a planned to a market economy. Since they do not want to democratize the political system, the Chinese authorities have been keen to push forward the rule by law through a professional and autonomous court system, albeit of socialist texture.

The 1980s economic reforms have engendered in their wake swelling inequalities and feelings of injustice. Where socioeconomic interests have become diversified and sometimes contentious, they can only be solved or at least alleviated by impartial institutions located outside government. Initiating legal changes, the Chinese authorities have unleashed new forces and new demands in society. Chinese citizens have been more aware of their rights, demanding their government and the courts to guarantee them. One of the best indicators of this profound evolution has been the steady increase in litigation. In 2001, nearly 6 million cases were handled by Chinese courts, as opposed to 4.5 million in 1995 and less than 2 million in 1987. Many cases have taken the shape of "economic disputes" and administrative cases, namely legal procedures against the government have become commonplace. Such legal modernization has been part of a more ambitious reform that pursued dramatic domestic objectives in order to perpetuate the rule of the Chinese Communist Party (CCP).

In 1989, the Administrative Litigation Law formally introduced administrative litigation into China's legal system. Many laws and regulations had been first drafted at the request of or for foreign investors, and later on extended to every legal entity or individual. However, the company law of 1994 and the contract law of 1999 apply only to foreign enterprises or individuals without bearing on Chinese entities or individuals.

In 1999, immediately after the CCP decided at the 15th Party Congress to "promote judicial reform," the Supreme People's Court (SPC) announced a five-year plan to build a "fair, open, highly effective, honest and well-functioning" judicial system. "Judicial fairness" was highlighted as the cornerstone of the judicial reform.

China's application and accession to the World Trade Organization (WTO) in December 2001 have speeded up the process of unification and

standardization of Chinese laws, as the PRC authorities were compelled to translate many multilateral commitments made to the WTO into their own legal texts. This exogenous influence resonated in economic and civil law as opposed to criminal, administrative, or constitutional law. These two large areas of the Chinese legal system have remained discrepant due to the instrumentalist approach to law favored by the CCP leadership.

Judicial reform acquired a new momentum during the 16th Congress of the CCP in November 2002. General Secretary Jiang Zemin's report to the congress stressed that the constitution is the highest law of the land: "No organization or individual enjoys any privilege above the Constitution and laws," laying emphasis on procedural justice. This appears to put the Communist Party itself under the constitution, at least theoretically.

In 2000, a new law on legislation ventured to establish clearer hierarchy of legal norms in the country. The National People's Congress (NPC), a puppet legislature, has rarely revoked illegal regulations promulgated in contradiction with national rules by provinces, municipalities, or counties. Hence, many intricate and almost unsolvable legal situations and disputes have arisen, where contradictory legal principles or administrative rules compete with each other, a situation that helps the local authorities protect themselves with specific regulations that the center has not been able to scrap or may not even be aware of.

In highly mobile and populous societies, officials face difficulties retaliating against particular individuals. Still, even in Shanghai, a prosperous, somewhat cosmopolitan city, where individuals are less likely to be fearful of suing government officials, government officials and CCP members interfere in administrative litigation, thus facilitating judicial corruption. This local protectionism has been less prevalent in Shanghai, since the city has enjoyed better judges and clearer rules. Owing to its prosperity, the city managed to recruit better-qualified officials and provide them with law enforcement training and advice. The city's prosperity makes the government less susceptible to any particular will of investors.

Even though the Chinese constitution recognizes the independence of the courts in their judicial activities, the one-party system has so far negated the emergence of an independent apparatus to control the bureaucracy.

Protectionism has a deep-rooted historical background in China. In today's PRC it is the result of two main factors: an institutional pattern deprived of checks and balances in the form of an independent control apparatus, and an economic strategy based on unequal development of various regions of the country. Many provinces, and particularly the less competitive regions, tend to implement only the national legal and

administrative rules that do not jeopardize their own interests, and to decree their own "domestic regulations." Article 126 of the PRC Constitution states: "The people's courts exercise judicial power independently, in accordance with the provisions of the law, and are not subject to interference by any administrative organ, public organization or individual." (Cabestan, 2005, p. 64) Regrettably, this constitutional provision has been nothing but lip service.

Privatization, constitutionalization, and politicization interact so that most cases concern private disputes initially devoid of any political dimension but end up being endowed with one. The right to equality (Article 23) has been frequently invoked in direct line with public action imbued with this principle. Two fellow graduates of the Institute of Law of the University of Sichuan, for instance, pleaded in two cases of discrimination in hiring practices in a restaurant in the city of Chengdu and in the local branch of the People's Bank of China. Regardless of numerous appeals and lengthy, sophisticated pleas by their professor, they were unable to obtain the application of the constitution as the text of reference to resolve the conflict.

During the SARS crisis in the spring of 2003, the demand of citizens that their fundamental right to information be respected was taken up explicitly in the media and by intellectual circles, and then brandished as a violent criticism of the government. In fact, the minister of health and the mayor of Beijing "resigned" and then were excluded from the party.

In yet another case in September 2003, after having appealed an initial ruling against him for having brought into China a book deemed to be subversive by a Chinese customs officer, a lawyer in Beijing managed to have the judgment overturned and the book returned to him. The lawyer claimed that the document specifying which works were forbidden was an internal one (and thus inaccessible to the public at large); it had been drawn up without the previous consent of the State Council or of the higher authorities of the customs administration, leaving free rein to arbitrarily behaving officials. This was the first case of a Chinese citizen to have obtained that application of a directive internal to an administration but carrying political ramifications be declared null and void by the Supreme Court in Beijing. The lawyer Zhu Yuntao, himself a member of the Communist Party, defended the author of the book that had been confiscated, explaining that because of his functions and his status he could not in any case seek to libel the institutions of the party. He asserted that respect for the rule of law and the struggle against bureaucratic arbitrariness should be considered a constitutional prerequisite and one of the party's tasks. Such situations are by far signs of a radical break, both with Maoism and with the judicial

conservatism of the 1980s even if they do not yet portend radical political change emanating from the secondary effects of growing rationalization.

Legal practice and justice are strongly contingent upon the political, economic, social, and cultural environment where they develop. An independent judiciary and rule by law have been hobbled by the lack of financial and human resources; still a developing country, China can only allocate limited financial and human resources to modernize its legal system. Corruption is yet another salient problem: In China, as in many nations in transition, the rolling back of the state has more often favored new spheres of uncontrolled power and social inequalities without a safety net, rather than new areas of self-restrained freedoms and well-accepted responsibilities. The might of the strong or the rich, the growing corruption of party and government cadres, and the venality of administrative positions are some of the most serious problems that the PRC regime faces today.

Overhauling China's trial system has not been sufficient to enable the Chinese courts to fulfill their functions and pursue justice. There is a new awareness among many within the Chinese legal community that all the reform measures will mean nothing without judicial independence, namely an institutional reform to reset the status of the courts and their relationship with other branches of government. Lamentably, the rule by law in China has been interpreted and guaranteed with respect to political, bureaucratic, and economic powers of the parties involved rather than according to principles of law or equity. Notwithstanding, the gap between traditional Chinese and Western legal values and norms has narrowed while Chinese law has been modernized in line with demands for impartial justice within Chinese society. New principles and norms irrigate the Chinese legal system, allowing first business organizations and people and then less influential or more controlled segments of society (workers, peasants, minorities, journalists) to enjoy legal rights. The judiciary has been brought to the center stage as an arbiter between private citizens and the government as a guardian of citizens' rights against government encroachment, and the role of the courts has been constantly reassessed. More and more, many of China's lower courts have taken innovative measures to challenge traditional thinking and break ideological taboos, casting new light upon the relationship between the individual and the government.

The UN Security Council: Reforming a Perplexed Peacekeeper

Article 1(1) of the UN Charter states the primary purpose of the international organization: "To maintain international peace and security, and to

that end: to take effective collective measures for the prevention and removal of threats to the peace, and for the suppression of acts of aggression or other breaches of the peace" (information in this section is drawn from Franck, 2006; Yoo, 2006; Schlichtmann, 1999; Imber, 2006; Trachsler, 2010; Weiss and Young, 2005). After 60 million deaths in World War II, states well understood the necessity for collective security and sought to forge parliamentary, executive, and judicial institutions that would ensure against such global catastrophes. The charter devised a new institutional process by which "to save succeeding generations from the scourge of war." In 1945, bearing in mind Panzer Divisions rolling across Poland, it was rational to assume that threats to peace would probably take the form of one state's armies massed on the borders of another as in the past, and that aggression would consist of armies marching across state borders.

The mandate of the UN Security Council (UNSC) contoured by the charter to maintain international peace and security did not subsume human rights issues. Soon after the charter had come into effect, conventional military action ceased to be the principal mode in which threats to peace tended to arise. The shift to endemic and brutal civil wars, egregious violations of a growing canon of human rights, and clandestine terrorism directed at civilians has rendered those systemic norms meant to address threats to the peace obsolete. These new kinds of threats to the peace and acts of aggression are not those the charter's drafters had in mind when they formulated the United Nations' central mission of saving populations from the scourge of war. During decolonization, human rights bore both on human conscience and UN operations. Throughout the world public opinion was in unison that egregious violations of human rights could not be allowed to stand behind a facade of state sovereignty. The charter had not anticipated this shift in priorities, because civil wars and genocides did not stem from aggressive states but were rather brought about by terrorists and factional militias—entities not addressed by a charter fashioned to deal with state-to-state provocations.

The UN Charter admits no exception when ruling in favor of state sovereignty and against the use of force by nations, so preventing humanitarian disasters or rooting out terrorist organizations finds no explicit approval in the text of the UN Charter. The charter sets up a Security Council that has the authority to order nations to use force "as may be necessary to maintain or restore international peace and security." Article 51 reaffirms that when a nation is attacked, it may use force to defend itself. Since the end of World War II, the majority of casualties have been due to intrastate rather than interstate wars; there have been no global, multistate

conflicts, no great power conflicts, and no wars in Western Europe or North America—conflicts have become more localized.

The end of the Cold War marked a tipping point in the world's political, social, and economic makeup. Efforts led by the United Nations in general and the Security Council in particular resulted in a new emphasis on democracy, humanitarian needs, and human rights. Many countries felt the need to reexamine the structure of the United Nations as a whole in light of the post-Cold War world, and mainly the structure of the Security Council—the one body having the resources and power to drastically affect the world community and international relations. Since the Security Council has the final decision as to what constitutes a threat to or breach of peace it can decide that violating human rights does pose such a threat. Progressively, the council has been willing to identify human rights violations as such and react accordingly, especially in grave circumstances. The UN Charter rules against intervention except in self-defense, so without the permission of the Security Council outside efforts to stop civil wars or prevent humanitarian disasters are illegal.

The United Nations has no sovereignty of its own; any collective action rests on member states. The Economic and Social Council (ECOSOC), for example, which has been given far-reaching responsibilities by the UN Charter, cannot work without the member states' power and consent. The UN Security Council's most powerful institute is the pentarchy, since its consensual approval is required for enforcement. Currently, the council includes the Permanent Five (P5) members—the United States, the United Kingdom, France, Russia, and China—and 10 member states that are elected for two years each. The temporary seats are allocated according to the United Nations' five regional groupings: three African states, two countries from Asia, Latin America, and the Western European and Others Group, and one state from Eastern Europe. Although the United Nations has informally adopted numerous administrative changes, the only change to its written charter was a one-off enlargement of the Security Council from 11 to 15 by adding four nonpermanent seats in 1965. Since the last expansion of the Security Council, the number of UN member states has increased from 113 to 192 today.

The composition of the permanent members reflected the political environment after the Second World War; it was never planned to be a law unto itself above the law. Only the number of five was meant to be permanent because it is important for the functioning of the consensus principle within the pentarchy, making it nearly impossible for them to war among themselves. The present composition of the five permanent members

of the Security Council does not cohere with stipulations in the UN Charter in terms of equal rights and equitable geographical representation.

The rules vest decision making in a small minority of member states, partly elected and partly self-selected. The charter reinforces the point by requiring that members "agree to carry out the decisions of the Security Council in accordance with the present Charter." Chapter VII of the charter empowers the Security Council to determine just which acts do and do not constitute a threat to international peace and security. The provisions of the veto in Article 27 authorize any permanent member to deny a violation. Since one member can overrule the views of the other 14, each P5 member can command or command against acts of violence, including one's own and those of one's allies.

Criticism revolves around overrepresentation of Europe versus flagrant nonrepresentation of the South. Considering that the veto prerogative lost some of its glare during the Cold War and became a tool of power politics, the need to remedy this imbalance looms large.

Reform of the Security Council has been a bone of contention for nearly 20 years. Several regional powers demand that the composition of the council should better reflect their economic and political clout as well as their financial and personnel contributions to the United Nations. Aside from the pentarchy, reminiscent of a bygone constellation of powers, there are additional factors that call for Security Council reform. After the end of the Cold War, veto has been used scarcely, but resolutions passed under Chapter VII of the charter (referred to as the "teeth" of the charter that enable military enforcement) have been on the rise. The principle of noninterfering in domestic affairs of states has given way to "Responsibility to Protect." Reform proponents endeavor to enhance the legitimacy of the council for the sake of more efficient decision making, more realistic mandates, and more determined implementation of its resolutions. Coming to grips with the lack of transparency in the Security Council proceedings has also moved to the front burner.

Discussions have been dragging on since 1992 without accomplishing any decisive breakthrough because proposals are not only incongruous but sometimes mutually exclusive. There have been three main blueprints for reform on the table: that of the Group of Four (G4) made up of Brazil, Germany, India and Japan; a second one of the group Uniting for Consensus (UfC) that subsumes Italy, Pakistan, Spain, Argentina, Canada, Mexico, and others; the African Union (AU) with its 53 member states tabled the third proposal. Proposals vary as to the number of prospective permanent and nonpermanent seats and their occupation, as there are many

contenders for these seats. Restructuring the Security Council implies accommodating the charter as well. This would not only require a two-thirds majority of 128 states in the General Assembly but also a ratification of the changes by two-thirds of the members, with assent from all five permanent Security Council members (Article 108 of the charter). The P5 pay lip service to the notion of a moderate expansion of the council but are not interested in any rapid change to the status quo.

From its inception in 1945 the veto right, the prerogative of the P5, was controversial, but the great powers forced that precondition for them to participate in any system of collective security to begin with. The AU in particular is adamant that future permanent members of the Security Council be given equal status with the P5. However, enlargement of the council may turn out to be a double-edged sword, as apart from augmenting its legitimacy it may also obstruct its decision-making ability and efficiency. The ECOSOC, which was expanded from 18 to 54 seats, represented a negative precedent.

The call for a dramatic change in the Security Council has been placed on the back burner since 9/11. "We have reached a fork in the road," Secretary-General Kofi Annan told the General Assembly in September 2003, referring to a pressing need to choose between reforms versus irrelevance. Shortly thereafter, he appointed the High-Level Panel on Threats, Challenges, and Change (HLP) comprising 16 experts, including four former prime ministers, attempting to reach consensus.

The HLP report of December 2004 was adapted by Annan to produce his own reform agenda, *In Larger Freedom* (ILF), published in March 2005. He suggested enlarging the Security Council by an extended and more equitable regional representation while also confronting the charter's inadequacies with respect to self-defense, terrorism, domestic human rights abuses, and various threats without borders such as HIV/AIDS and other pandemic diseases. Aware of the need to balance simple representational arguments with efficiency and effectiveness, Annan stated: "Those that contribute most to the organization financially, militarily, and diplomatically should participate more in Council decision-making."

Most of HLP's recommendations remained a dead letter. Over the last decade, rhetorical fireworks have not culminated in amendments to the charter but have, nevertheless, been conducive to a more permissive environment that facilitates pragmatic modifications in working methods and improved on the council's democratic accountability. Perhaps amending the charter is still impossible, but overall the system of collective security has proven itself quite tractable in practice. When there is willingness to

make the charter work in new circumstances, the dead hand of the literal text has not always barred the way to transformative change via apposite reinterpretation of the existent charter. It need not preclude even more radical and urgent reform of the system henceforth.

Germany: A Nonimmigration Nation, Rife with Immigrants—Article 16 of the Basic Law in the Limelight

The 1948 Universal Declaration of Human Rights (UDHR) enshrines in Article 14(1) "the right to seek and to enjoy in other countries asylum from persecution." The principle of nonrefoulement codified in the 1951 Geneva Convention on Refugees that prohibits receiving states from expelling bona fide refugees to states in which they face persecution has since matured into binding international law. The right of asylum is the right of states to grant asylum, not the right of individuals to be granted one (information in this section is drawn from Devine, 1993; Joppke, 1997; Hansen and Koehler, 2005; Martin, 1994; Green, 2001; Hellmann and others, 2005). Generosity vis-à-vis would-be immigrants tends to decouple the state from its people, tying it instead to unpopular, somewhat elitist principles of humanitarianism. States facing immigrants and asylum seekers endeavor to reconcile internal pressures with commitment to universal principles of human rights.

France and Germany are two of the most important migrant-receiving countries in Europe, and along with the United Kingdom have among the largest ethnic minority populations in Europe. Germany's leaders have stated that "the Federal Republic of Germany is not, nor shall it become a country of immigration." The majority of politicians and Germans (mainly elites) still cling to this idea.

For many years, German exceptionalism had a restrictive and widely criticized citizenship and naturalization regime based on blood affiliation (*jus sanguinis*), a derivative of *völkisch* nationalism. On the other hand, its constitutional law strongly protects the right of asylum and fundamental human rights of noncitizens independently of citizenship. The progenitors of the basic law, many of whom were exiled during the Nazi régime, conceived of an asylum law that went far beyond existing international law as a conscious act of redemption and atonement.

The constitutional provision in Article 116 hinged upon Germany's existing citizenship law (the RuStAG) of July 22, 1913, stipulating in keeping with that era's ethnocultural nationalism that German citizenship could only be inherited by descent (the principle of *jus sanguinis*). When the West

German basic law was drafted (1948), Article 116 defined as German (but not West German) all those of German cultural and ethnic descent who had settled within Germany's boundaries as of December 31, 1937. The expansive provision of cultural descent covered all the expellees (*Vertriebene*—Germans who had either fled their homes in parts of Central and Eastern Europe or had been expelled following World War II), even if they did not actually hold formal German nationality at the time. Moreover, because Article 116 included the territory of the GDR (German Democratic Republic, namely East Germany), all its citizens were automatically German citizens, too. By 1950, 8 million expellees had already settled in the FRG (Federal Republic of Germany—West Germany), but after 1950, with the Cold War taking hold in Europe, the focus of migration to West Germany shifted to East Germans fleeing the GDR. Between 1949 and 1961, 2.5 to 3 million GDR residents had settled in the FRG and integrated rather quickly into a hungry-for-labor economy.

The experience of Nazi tyranny, evinced most brutally in the Holocaust, delegitimized *völkisch* conceptions of belonging and Aryan ideals, institutionalizing instead universal human rights (Hansen and Koehler, 2005). In an attempt to atone for some of the horrors of the Nazi era, Germany's 1949 Basic Law or constitution sought to create a safe haven for those around the world suffering from totalitarian oppression. Article 16 stated that "persons persecuted on political grounds shall enjoy the right of asylum." There were no numerical limits or quotas on those obtaining asylum in Germany. Furthermore, because asylum had been a constitutionally guaranteed right, applicants were entitled to public assistance and accommodations until their applications were resolved. Parallel inflow of ethnic Germans (who were granted automatic citizenship according to Article 116 of the Basic Law) and asylum seekers created insidious distinctions.

Most foreigners living in Germany have been a legacy of failed guest-worker policies from the 1950s and 1960s. Those guest workers had sustained Germany's economic miracle, but they did not follow the plan to leave their manufacturing, mining, and construction jobs to make room for fresh temporary workers. It suited their employers to keep them, and it suited the foreign workers to stay and to bring their families to Germany. The Aliens Law of 1965 was set up to regulate the status of guest workers in (West) Germany, looking upon foreigners as economic commodities at the discretion of "German state interests." Aliens were made equal to German citizens in crucial respects by assertive federal courts that have construed aliens' rights analogously to the rights of Germans, arguing that acquired social and economic ties entailed the right of permanent stay, including

access to wide-ranging social benefits, pursuant to the German welfare state precepts embedded in the constitution. The massive settlement of probationary migrant workers in Germany transformed a narrow labor market policy into a ponderous immigration phenomenon.

From 1913 to 1993, only those of German descent had a *right* to German citizenship. The arrival of guest workers was negotiated outside the framework of legislation; since there was no policy on naturalization, power over it rested with the *Länder* (the 16 federal subdivisions of The State of Germany). In 1977, the federal minister of the interior issued "guidelines" on naturalization, which were nonenforceable instructions to the *Länder*. Initially, there was great variation among the *Länder* in the treatment of asylum seekers. The southern *Länder* of Bavaria and Baden-Württemberg, conservative but also vulnerable to south-north migrations, spearheaded measures of deterrence such as herding asylum seekers in camps, providing in-kind benefits only, imposing work bans, and being quicker to deport rejected asylum applicants. The northern *Länder* of Lower Saxony and North Rhine-Westphalia and the city-states of Bremen and Hamburg, liberal but also more insulated, originally shied away from such negative measures. Soon enough, though, the intra-German north-south pull of asylum seekers forced the gentler north into a "deterrence competition" that eventually flattened such differences.

An influential early 1970s decision of the German constitutional court required candidates for naturalization to renounce all other citizenships. In addition, naturalization had to be in the interest of Germany, not the migrant. Within a year of unification, the scale tipped toward relieving requirements for naturalization; although modest by international standards, reform reflected a major ontological shift for Germany. Before 1993, no one except members of the ethnic German community had a *right* to acquire German nationality, and all naturalizations were discretionary. Henceforth, naturalization for those born and educated in the country and those with substantial periods of residence there became a legally enforceable entitlement. Aliens resident in Germany between the ages 16 and 23, for example, have had the right to naturalize if they fulfilled the following conditions: renunciation of previous citizenship; normal residence in the Federal Republic for at least eight years; completion of six years' full-time education, at least four of them at the secondary level; and no criminal convictions. Those living in Germany for 15 years had an entitlement to naturalize if they renounced their previous citizenship, had not been convicted of a criminal offense, and were able to support themselves without claiming unemployment benefits or income support.

Since the mid-1990s, Germany changed its position and blocked further integration, so policies concerning asylum and refugees became increasingly restrictive. Human rights considerations began to give way to economic arguments, justifying the more restrictive policies. Following the Conventions of Schengen (June 14, 1985) and Dublin (June 19, 1990), security considerations have become more prevalent. Nevertheless, neither the Schengen Agreement nor the Dublin Convention could have solved the German "asylum problem" of asylum seekers thronging the country. As the Cold War phased out, frontiers to Eastern Europe had opened, and far more refugees and asylum seekers ventured into European Community (EC) territory and especially German territory; the Schengen arrangements reframed the matter as a common European interest. Changing the Basic Law was necessary in order to meet European requirements, so any consequent change to the liberal asylum law in Germany was now no longer a failure of German politics or the breaking of a taboo, but rather a consequence of decisions at the European level. The liberal-conservative government fell into line with intergovernmental rules, using a tactical maneuver to portray the change as a real obligation to the European Union (EU). In effect, Germany restricted its asylum law to an extent that was by no means necessary on the basis of the EU's soft law rules.

The Amsterdam Treaty (May 1997) achieved freedom of movement and introduced an Area of Freedom, Security, and Justice as a new objective for the EU. European refugee and asylum policy was reduced to compensatory measures to safeguard internal security in a border-free Europe, restrictive of the lowest common denominator.

Following a landslide victory in 1998, Gerhard's Schröder's SPD/Green coalition came to power with a comfortable majority in both chambers. On January 14, 1999, the coalition presented a radical overhaul of German citizenship fully allowing for dual citizenship. The principal provisions lessened the residence period to qualify for naturalization from 15 to 8 years, 5 years for children, 3 years for spouses, and *jus solis* for children of foreign parents who had been born in Germany or who had immigrated before the age of 14. All major newspapers, churches, and unions supported the reform.

Despite favorable ambiance, the reform has never come to fruition. At first, the opposition switched venues: Rather than fighting the government in parliament where they were a minority in both houses, they took the debate to the streets. It failed to force a plebiscite but managed to launch a signature campaign. Second, in light of the impending elections in Hesse, one of the 16 Länders composing Germany, the opposition broadened the

debate with the goal of boosting the chances of the Christian Democratic Union (CDU) candidate Koch against the Red-Green government. Third, the opposition reframed the discourse by depicting themselves as integration aficionados rather than its adversaries, proclaiming that foreign cocitizens enrich German society, so integration was not only a necessity, but also a desired political opportunity. Armed with such a positive conception of integration, the opposition portrayed dual citizenship as inimical to it, namely divisive and creating precisely the "segregated communities" that would endanger a culture of "tolerance and togetherness."

The EU played a role in favor of the reform adversaries the same way it had happened in 1993, impeding further leniency with regard to naturalization. In the interplay between German policy and structures of European governance, the Maastricht Treaty (1992) empowered European regions such as the *Länder* in Germany. Later on in 1999, the *Länder* used the constitutional powers they had gained by that empowerment to vigorously defend their particular interest, since they were the ones having to accommodate asylum seekers. The *Länder* compelled the German delegation to reject more integrationist proposals. As the relative distribution of asylum seekers in Europe had changed to the benefit of Germany, the number of asylum seekers had dropped rapidly from a peak of 468,200 in 1992 to 104,400 in 1997, after which the *Länder* were unwilling to dilute national sovereignty to an extent that could enable European decision makers to reverse that trend. Helmut Kohl and the federal government finally yielded, upholding the antidual nationality, anti-integrationist stance.

Comparing Defense, Police, and Judiciary across Nations

This chapter scrutinizes changes to core activities and provisions of the nation-state in the Weberian sense. Those domains used to be highly centralized and monopolistic; willy-nilly, that is no longer the case.

Exogenous changes and institutional change underlie the crisis reform literature. When the dissonance with the transformed environment is too great and the crisis erodes the legitimacy of the policy sector to a great extent, there is a chance to diverge from the usual incremental way, bringing about a reform after overcoming individual, organizational, and political stumbling blocks (Resodihardjo, 2009). France and Israel have reformed their armies, their erstwhile sacred cows. Nonsupportive military and financial trends as well as social changes watering down industrial democracies finally took their toll on France, gnawing at the legitimacy of its army and in particular at

conscription. After years in which France refrained from going whole hog and rather shortened the service, French authorities retained compulsory military service but made it selective and differentiated. It was no longer about defending national territory but rather collaborating with international armed forces (NATO), which entailed a more professional and modular military model. Such shifts alongside an ardent political entrepreneur tipped the balance in favor of full professionalization of the army, paving the way to end conscription in 1996.

Like France (and many modern developed societies, for that matter), Israeli society has also been marked by rising individualism and fading appeal of traditional values and attitudes upon which the social acceptability of conscription has been based. Akin to France, Israel resorted to more selective recruiting as more and more groups and individuals have dodged conscription, so it has no longer been universal. An even more salient reform has taken place in the reserve army. The number of reserve-duty days has been curtailed dramatically by, among other things, lowering the maximum age for reserves since the cost of reserve duty has been shifted from the National Insurance Institute to the army. Rather than standing above the market or even competing with it, the IDF has been subjugated to the market. Casualties are no longer conceived as a necessary evil, and more and more parents, especially bereaved ones, are asking to be heard. In the same vein, the mass media has started to be more exacting and fierce with respect to the once tabooed, hushed-up security matters. Although the army becomes more professional in line with the French one, conscription has not been abrogated. Still, complying with the recommendations of the 2007 Brodet Committee, extensive privatization proceedings take place within the army; kitchen services, transportation, construction, and maintenance are outsourced or contracted out.

The case of the Federal Emergency Management Agency (FEMA) is above all a caveat against organizational schizophrenia or identity crisis. Preventing natural disasters altogether is beyond mankind's reach, but reducing vulnerabilities is possible. Emergency management can be an ungrateful task since successes are immanently nonevents while catastrophes and failures attract (mainly media) attention. The case of FEMA exemplifies how a charismatic and adept director can mobilize politicians' and public opinion in order to attract wherewithal to transform a befuddled, incompetent organization to a state-of-the-art emergency management agency. In the aftermath of 9/11, FEMA has been subsumed under the newly erected Department of Homeland Security (DHS). This turned out to be a lamented mistake as FEMA lost its identity, becoming just

another cog amid a plethora of agencies, most of which were much more proficient at dealing with internal security matters. FEMA lost its relative independence, becoming a component of a convoluted structure, losing also its human resources as more and more staff left, exhausted by turf wars within the DHS, taking with them the accumulated knowledge, lore, and know-how and rendering the agency futile. The atrocities of Hurricane Katrina had been a wake-up call inculcating among people and politicians alike the notion that a specialized emergency management agency is crucial, since terrorist attacks are not the only danger to human lives. Lessons have been learned: A new law regulates emergency management, laying emphasis on citizens' participation while empowering them to take preventive measures to reduce risks and vulnerabilities within their own communities. Cooperation between different governmental levels (federal, state, and municipal) has been addressed and streamlined. FEMA has won back its identity and mission of emergency management, realizing it should stick with it since there are enough specialized, better-equipped security agencies to go around. A clear and delineated mission is a sine qua non of every effective organization, as resources should by nature be geared toward that mission.

From its outset in the end of the 1980s, the paradigm of "community policing" has been to the police what new public management (NPM) has been to public administration. In those heady days, community policing was the putative panacea for police maladies whether real or imaginary, arising from reconsidering police strategies and practices in the 1960s and 1970s. Community policing is regarded as a strategy for improving relations between the police and the public and enhance police effectiveness in preventing and controlling crime. The four elements of community policing are organization of community-based crime prevention, reorientation of patrol activities to emphasize nonemergency servicing, increased police accountability to local communities, and decentralization of command (Skolnick and Bayley, 1988). Community policing raises concerns about the implications of thoroughly integrating the police into the community.

In the cases mentioned above, this undertaking has been obfuscated even more due to the oppressive military past of the police. The vestiges of a bygone era in which the police force was the repressive arm of a tyrannical racial regime and one of its most emblematic features are not easily uprooted. In South Africa, civil society groups are considered suspicious and regarded as threatening security rather than contributing to it (Marks and others, 2009). Catchy slogans can be excogitated overnight, and new uniforms may be quickly matched with novel insignia, but forsaking

altogether the so deeply ingrained military oppressive past is a tall order that entails much more than that. Inertia makes it very difficult for organizations to change. The nature of police work as well as entrenched normative schemas pertaining to discipline make it even harder for the obstinate police to change (Skolnick and Bayley, 1988).

In Colombia as well as in South Africa the police reform was subsumed under a much more comprehensive reform changing the essence of the whole regime. New constitutions were forged in 1991 and in 1994, in Colombia and in South Africa respectively, which attests to the profound, culturally embedded nature of the shift underpinning police reform: "Community policing means different things in different communities, and to make it work can involve reinventing government, not just the police department." (Skogan and Hartnett, 1997, p. 4) Although both the army and the police exert force, by no means are they the same. Public security differs from national security in that it emphasizes protection of persons, property, and democratic political institutions from internal or external threats. National security in contrast emphasizes protection of the state and territorial integrity from other state actors as well as from transstate actors such as organized crime, terrorism, and the like. The target of the police is the community with which it has to collaborate while empowering it; the target of the army is the nation-state's enemies whom it has to annihilate (Bailey and Dammert, 2006). This is mainly critical in instances of democratic transition, since military forces are neither trained nor equipped to patrol city streets, village plazas, or country byways. Street demonstrations, for instance, are normal channels of participation in political life. Army units are typically less skillful in handling crowds than are police, and incidents of unnecessary violence are to be predicted, hampering democratic transition (Bailey and Valenzuela, 1997).

Demilitarization of Colombian police has been a tedious venture. In 1991, a civilian defense minister was appointed for the first time after 40 years, granting the police greater operational autonomy with respect to the army. Contrary to expectations, it did not wrest the police from the military line of command completely. Military chains of control are known to be very persistent, never mind the civilian head: "Army officers assigned to police duties may theoretically report to civilian superiors but the more likely reality is that the military chain of command will remain in effect to an important degree." (Bailey and Valenzuela, 1997, p. 55) The Colombian police force has held onto its military traits, which account for its identity crisis.

During the 1990s, the police force was finally managed by police officers who were trained as police, by police, in police academies, and under the

control of a chief of police who was also a police officer. Regardless of a civilian defense minister, police officers declined a new career path and clung to their military-style ranks. Midranking police officials opposed university training to specialize in community policing to cater to citizens better. Even the police's great reformer was none other than *General* Jose Serrano.

Change did come about even if it has been slower than some have anticipated; there is no magic bullet to undo people's hearts and souls and to eradicate entrenched norms. NPM directives were followed through in South Africa and Colombia, stressing management, targets, performance indicators, public participation, and accountability. Colombian citizens collaborate with police and cooperate among themselves in thousands of community fronts. Citizens' views have been solicited via surveys. The metamorphosis of Colombian police was couched in big words/concepts such as cultural transformation (De la Torre, 2008; Ruiz Vásquez, 2012). The once opprobrious police force has been reborn as the government institution exhibiting the largest increase in public confidence for the past decade, with the armed forces coming in a distant second (De la Torre, 2008; Llorente, 2006).

Years of colonialism, apartheid, and repression in South Africa have left in their wake an ethnically heterogeneous but a highly segregated population. The police force is the spitting image of the society in which it is embedded: Race and gender imbalances are striking; chiefly white men populate the higher ranks and certain elite units, while women, indigenous people, and ethnic minorities constitute the rank and file. Following years of oppression and deprivation, the hoi polloi lack the human capital to ascend the social ladder while the police force still strives to break away from its military past. The police are more than happy to engage the private sector as opposed to ordinary citizens, so community policing has become a dead letter. Most behavioral changes are perfunctory because management of labor relations remained autocratic. Even if South African police lag behind in espousing a civilian, accountable, service-oriented stance, human rights are upheld by a mosaic of bodies and organizations that stay on guard against human rights infringements, regulating and keeping an eye on the police. Many NPM-style measures did take hold such as performance indicators and privatization via partnerships and joint working agreements made with private security companies.

Ushering in private providers has also been an eminent feature of the prison and probation services in Britain. Following many reports by Her Majesty's chief inspector of prisons over the years depicting prisons (many of

which were outmoded Victorian ones) as a disgrace to any civilized society (Flynn, 2007), market testing and compulsory competitive tendering have been introduced, the favorite solution of the Conservatives embraced by their successors. Private and not-for-profit providers have also been introduced into probation services, encroaching upon a preeminent Weberian attribute of the state; that is, a monopoly with respect to organized violence. Private is not necessarily better, and there is still much room for improvement in both private and public sectors. In South Africa 11 homeland forces have been consolidated, forming a single national police force, whereas in Britain the prison and probation services have been amalgamated under the aegis of a new executive agency, the National Offender Management Service (NOMS); the road to a seamless service working concertedly is very long and fraught with institutional and cognitive barriers.

Focusing on citizens as customers and partners whose "voice" is not only heard but often solicited is a salient feature of all three reforms vetted in this section. Performance indicators have been forged and targets have been set forth, so the public could gauge whether it got its money's worth. Those elaborate accountability mechanisms are yet another feature of NPM-inspired reforms. A major shift took place in Britain as the "law-abiding majority" is seen as clients of the prison and probation services. It is to their welfare and needs that those services now cater, while culprits are no longer treated as helpless victims of circumstances but rather as people who chose to do wrong and need to redeem themselves and to indemnify those they have hurt and the public at large. All those measuring, evaluating, and performance regimes entail much effort and resources, but they do bear fruit: This outward-facing service demonstrates, on a regular basis, the value of what it does vis-à-vis public expectations.

Judicial reform in China has also been embedded in an all-encompassing transformation, namely that of the socialist market economy since its opening up in 1978 and the civil and commercial disputes arising from it. Alongside resurrecting legal professions, and as Western norms and institutions have impinged more and more on China, Chinese citizens have appealed to the law in the name of equity and justice, and courts have increasingly managed to cater to them. That latent revolution is still incipient and inconsistent mainly because there is no hierarchy of legal norms in the country. In addition, the legal system is not independent, but rather highly politicized, and strongly replete with corruption and incompetence. The change taking place slowly and covertly attests to the flexible nature of law that facilitates reinterpretation in order to protect human and property rights from governmental arbitrariness without altering the legal framework or provisions.

The flexibility of the law is also evident in the case of the UN Security Council. Under new, emergent circumstances, the same charter that regarded state sovereignty as sacrosanct has been reinterpreted, justifying encroachment on sovereignty in cases of human rights violations. The environment that gave rise to the charter has changed substantially and created dissonance that had to be resolved in keeping with new conjunctures, since the charter has to accommodate the member states and not the other way around. Changing the composition of the Security Council proved to be much more grueling; permanent members have been reluctant to forfeit their stronghold or even share it with contending powers.

Proclaiming not to be an immigration nation, Germany had one of the most lenient laws regarding noncitizens in 1949, since the Nazi era atrocities still loomed large. Germany was for many years the promised land of bona fide and not so bona fide asylum seekers, guest workers, and ethnic German immigrants. The influx of immigrants pouring into Germany continued undisturbed; the matter was delicate and flammable in Germany, suiting other European countries just fine when their receptive ally prevented the problem from being in their own backyard. When internal European borders started fading away as the European Common Market evolved into a full-fledged European Union, it was no longer a German issue but rather a European one. Germany seized the opportunity to align itself with its neighbors and change policy and laws concerning asylum and immigration. Asylum seekers could no longer "shop around" in more than one EU nation because denied entry to one country meant a refusal by all.

The German case stands out as the antipode of the Chinese one. A democracy should be responsive to its citizens and attentive to supranational behests. Germany acted in line with dictates from above and catered to constituencies' outcries as immigrants were exhausting the country's wherewithal. China, despite internal and external pressures, is much slower to change, and alterations come about not wholeheartedly but rather as lip service paid to economic development. Adjustments are subtle, covert, often tacit, and slow; it is very much unlike the fanfare that accompanies legislation and policy in a democracy such as Germany.

If someone was mistaken to think that the loci of state powers are immune from changes taking place in service provision for quite some time now, it soon became evident that NPM strand-of-thought processes pervade even the traditional core of state activities such as national defense, public security, and jurisprudence. Some may lament the nation-state's untimely demise, whereas others may look upon those proceedings favorably, perceiving it as a welcome rebirth of a phoenix.

TRADITIONAL GOVERNMENT ACTIVITIES II

Economy, Finance, and Taxation Systems

In this chapter we add another traditional set of government activities to our comparative discussion—the one dealing with the financial and economic side of administration and government.

For most of history, government economy and finance were centralized and in the hands of rulers. Most economic activity was financed based on indirect taxes and taxes in labor and in kind. Modern governments are predominantly financed on the basis of direct taxes, but there is variation across countries. Also, there is variation in the degree to which subnational governments have latitude to raise revenue as they are dependent upon national governments. With regard to developments in expenditure, we will find striking similarities between countries.

The chapter reflects upon the core economic functions and cumbersome constraints that emanate from growing demands in modern societies. Following those demands, economically oriented reforms have propagated all over the world for the last decades. We will consider the way in which varying economic conditions have issued different answers forged by countries, in order to face local and global challenges mandated by the modern zeitgeist.

Our discussion will be divided into three sections. First, we will overview some core prospects of the economic and finance conditions in a set of different countries from various continents and cultures. Next, we will probe some taxation systems in various countries and see that, although

looking for the same outcome, they are quite unique and specifically structured to respond to the respective challenges of countries. Finally, we will try to provide some comparative dimensions amongst countries.

Akin to other chapters, we confess that no full comparison is possible considering the disparate immense subjects and the complexity of the national systems. However, it may serve as another brick in the wall of comparative effort to understand our governmental and administrative realm.

Economy and Finance

Once people became sedentary, they established physical trade markets where they could exchange their own products with those manufactured elsewhere. City-states and empires alike regulated trade and taxed it. It was not until the nineteenth century that it became clear that an abstract "free market" could not exist without government regulation. Indeed, the laissez-faire economy was the product of deliberate state action (Polanyi, 1944, p. 141). The notion of a government-protected free market has a strong hold across the globe. Based on experiences in Latin America, the economist John Williamson defined a set of specific policy recommendations known as the Washington Consensus, and they included fiscal policy discipline (avoiding large fiscal deficits), directing public spending from subsidies to pro-growth and pro-poor services (such as primary education, primary health care, and investments in infrastructure), and tax reform (Williamson, 1993). The term "Washington Consensus" refers to a set of specific neoliberal economic principles that should constitute a standard policy reform package for crises-wracked developing countries. These should be promoted by Washington-based institutions such as the World Bank, the International Monetary Fund, and the U.S. Treasury Department. In this section we will look more closely at the intertwinement of the economy and of finance in times of reform and crisis, especially since the end of the twentieth century. We will look at cases from the developed world but also from developing countries, and in a comparative view. This can demonstrate to the reader how governments deal with policy concerns, learn from one another but also remain quite different at the same time.

Romania: Restructuring Agriculture in a Transition Economy

More than two decades after the formal end of the socialist economic experiment, structural change revolves around constant changes in

deployment of factors of production. Within agriculture, workforce has downsized, the number of farms has fallen off, and so has the proportion of those employed in agriculture, affecting rural livelihoods and labor markets, productivity, and profitability (information in this section is drawn from Buchenrieder and Möllers, 2009; Davidova and others, 2009; Rizov and others, 2001; Rizov, 2003; Luca, 2007, 2012; Salasan and Fritzsch, 2009; Campos and others, 2010). Reorientation to farming in Eastern Europe has given rise to a large number of tiny (semi-)subsistence farms that have not necessarily reacted to the same policy signals as larger commercial farms. Nonfarm activities can unfetter families from poverty and spur rural development, since those who have found employment elsewhere exit the farming sector, allowing more competitive farms to grow.

After World War II, the communist regime had created cooperative farms via forced collectivization of land and assets of individual farmers; by 1989, there were around 3,800 cooperative farms with an average size of around 2,400 hectares using 59 percent of agricultural land. State farms were large-scale, capital-intensive enterprises organized on land that had been confiscated from the royal family and large landowners after World War II, so in most transition countries agricultural production was organized in large-scale collectives or state farms under communist rule. Since the state controlled most agricultural land, the share of private land ownership amounted to barely 9.45 percent, although it varied considerably between counties.

Despite vigorous attempts at industrialization under the communist regime, Romania retained a strong rural culture, since the agricultural sector was the backbone of its economy. Agricultural employment accounted for around 30 percent of total employment in the 1980s. In addition, a large number of nonfarm workers were farming part time. Agriculture was organized into three kinds of enterprises: state farms, cooperatives, and small private individual farms. When Romania embarked on economic reform at the beginning of the 1990s, state and collective farms were restructured and assets of agricultural production were privatized.

Following the breakdown of the communist system in Romania, cooperative farms have been completely transformed into agricultural societies, farmers associations, or individual farms. Individual farming has had the advantage of lowering transaction costs associated with the need to supervise labor and reduced inefficiencies owing to codetermination. Potential disadvantages might have involved the loss of economies of scale in risk management, provision of information and credit, input purchasing, marketing, and production. Apart from that tradeoff, the shift to individual

farming has been further influenced by the costs for individuals to leave the collective farm and start up an individual farm. These costs are affected by land reform, privatization, and pertinent regulations. According to the European Commission (EC, 1998 cited in Rizov, 2003), by 1997 more than 3.5 million individual farms with an average size of 2.3 hectares occupying 58.6 percent of total agricultural land dominated Romanian agriculture.

In 2004, the government undertook to stimulate the transformation of peasant households into commercial family farms by consolidating land through exchanges and free market transactions, support for investment in livestock farms, and introducing life annuity for old peasants who were willing to give up their land in favor of those farmers who were willing to modernize and grow. Pensions, however, had been so low that agricultural activity on any scale was not an option but rather a must for most pensioners, which kept them trapped in the sector. Agricultural farms that had enjoyed a sound footing were the most obvious beneficiaries of the foregoing "Sapard" program because they could insure finances and cofinance investment projects, some of which were sponsored not only by the national government but also by the European Union (EU). The "Farmer" program was adopted in 2005 to enhance activity in the rural area by attracting loans and investments for the Sapard program; it had been set up by the Ministry of Agriculture but was carried out through banks and financial institutions selected through a public bidding process. That national program supported investments in agriculture and in other sectors connected to the specifics of agricultural activities such as processing, storing, preservation, and marketing.

After Romania joined the EU in 2007, its agriculture became part of the EU's agriculture. Since the 1970s, the number of farms in the EU has tapered off as labor was replaced by technology and capital, the result being more equipment and fewer workers using almost the same agricultural area. In 2012, the change in Romania's economic profile was revealed as it turned out that agriculture's share in GDP had gone down by half from about 14 percent in the first half of the first decade of 2000 to around 7 percent in the second part of that decade. In Romania, as in other EU member states, farm size had the tendency to increase with economic development. For the long haul, higher agricultural income per worker on the larger-size farms has been an argument in favor of farm consolidation. Europe's Common Agricultural Policy transfers had been traditionally absorbed by large-scale, efficient producers and even more so after the 2003 reforms that linked subsidies to farm size. In the short and medium term farming practices matter the most, so applying modern technologies has been paramount in

terms of long-term performance and gains. Many small and medium farms have met with declining labor productivity, chiefly in areas locked into a poverty trap—a combination of unfavorable initial conditions and economic collapse both in agriculture and in nonfarm sectors. Poorly developed market infrastructure, low productivity, and lack of capital bear heavily on smallholder (subsistence-oriented) plots.

Low productivity of small- and medium-size farmers, by tradition grain producers in interaction with certain speculative actions, has often rendered farmers' incomes insufficient to modernize despite possibilities for support from EU funds. Even though agriculture in itself can no longer be a major source of economic growth, the challenge for Romania's agriculture (and food industry) has been to bring down the deficit from agrofood trade.

During recent years, Romania has managed to reduce poverty. Already in 2008, the United Nations Development Program (UNDP) in Romania could indicate a reduction of severe poverty for the last five years from 10.5 percent in 2002 to 4.1 percent in 2006 and in rural areas from 17.5 percent to 7.1 percent. Disparities between rural and urban regions have nonetheless persisted, which has been ascribable to overall economic development. On the other hand, agriculture has served as a social safety net for many millions of people. Rural poverty may be further alleviated by creating nonfarm jobs in rural areas to provide income opportunities for surplus labor. Both new farmers and potential nonfarm employees seem to require profession-specific advice and training in order to become competitive in their transition environment. Pensioners could be convinced to exit the agricultural sector if their income from social provisions covered their daily needs.

Spain: Faltering Growth, Wavering Employment Rates—An Economy Veering between Prosperity and Downspin

Under Franco's dictatorship, the system of industrial relations had rested on rigid employment protection legislation (EPL) and a ban on unionization in exchange for lifetime job security; during the late 1970s, the first democratic government in Spain found it hard to dismantle that system. EPL gives differential treatment to different groups of workers, particularly in regard to dismissal. Regulations created a wedge in firing costs across workers because they have varied with age, gender, skill, firm size, and type of contract. European and Latin American countries have attempted to increase labor market flexibility through marginal changes in EPL that liberalized the use of fixed-term (or temporary) contracts, whereas

legislation concerning the stock of employees under open-ended (or permanent) contracts has been left almost untouched (information in this section from Bentolila and others, 2008, 2011, 2012; Éltető, 2011; Muñoz de Bustillo and Antón Pérez, 2012; Neal and Garcia-Iglesias, 2012; Ferreiro and Serrano, 2012).

From the second half of the 1990s until 2007 Spain experienced a spectacular period of economic growth in which its GDP per capita had reached 90 percent of the EU-15 average. The recession of the early 1990s had left high public deficits in its wake, but afterward they tapered off and a surplus was even achieved between 2005 and 2007. Unemployment rates that had been habitually high waned to below 10 percent during that golden decade. This is even more remarkable when taking into account that during that time the number of immigrants quintupled, amounting to 5.7 million foreigners in 2010, making up 12.2 percent of the population. Between 2000 and 2008, immigrants' employment rate mounted from 1 percent to 14.8 percent, since the labor market was easily able to absorb these people. Foreigners took on approximately half of the vacant jobs created during this period in services, tourism, agriculture, households, and mostly in the construction industry. The labor force participation of women almost doubled from 37 percent in 1996 to 66 percent in 2009, adding up to 3.9 million extra jobs.

Spain had started a process to become a full member of the EU in 1986, and by 2002 it was admitted into the European Monetary Union (EMU). Spain had been undergoing economic and social changes throughout that process to align itself with its European neighbors. Peripheral countries that joined the Eurozone by 2002 were forced to maintain a fixed nominal exchange rate with their more advanced trading partners. However, their real exchange rates continued to appreciate as long as their domestic inflation rates were higher than those of the more advanced Eurozone economies and they could also borrow at favorable interest rates from the rest of the world and apply that surge of funds to whatever projects they desired. This proved to be housing in the case of Ireland and Spain, government services in Greece, and government construction in Portugal, but in each case, the most desirable investment was in nontradable goods or services. Access to cheap financing through the facilities of the European Central Bank (ECB) coupled with soaring prices of nontradables (service sector labor, land, and housing) became a common denominator of many peripheral European countries under the EMU's operating rules.

The subprime mortgage crisis in the summer of 2007 was only a prelude to a worldwide round of financial upheavals that swept developed,

developing, and emerging economies alike in 2008. The Greek crisis of 2009 that brought to light its swollen sovereign debt gave rise to a second round of financial turbulence that did not skip Spain. Relaxing access to credit triggered an investment spurt, which, alongside inflow of immigrants, led Spain to specialize in low value-added, labor-intensive industries (construction, tourism, personal services, and so forth).

Economic growth in Spain relied heavily on the construction sector whose size in GDP terms rose way above the EU average of 6.2 percent, from 7.2 percent in 1997 to 12.1 percent 10 years later; during that decade one out of every five jobs created in Spain had to do with construction. Two-thirds of the housing units built in Europe between 1999 and 2007 were built in Spain. The government cultivated those mega-investment projects with thousands of houses and residential areas even more after 2003 when it liberalized use of constructible land, drastically boosting its value. Housing prices tripled in nominal terms and doubled in real terms between 1995 and 2008, spawning a construction bubble.

The peculiarities of the Spanish labor market go back to the Franco era, during which wages and productivity were low and jobs were protected in order to maintain social peace. Trade unions were illegal, and collective bargaining was dominated by employers at the province or industry level. Following the democratic transition of the late 1970s, union delegates have been awarded a substantial prerogative at all levels of collective bargaining: state, province, and firm.

Spain's dual labor market dates back to Law 32/1984 that sought to reallocate workers from decaying industries to more profitable ones against a backdrop of oil shocks. In the wake of the second oil crisis that had bloated oil prices, unemployment rates surged following massive layoffs in energy-intensive sectors such as mining, shipbuilding, and steel. Unions opposed any attempt to alter the status quo, so the only politically feasible way to adjust the labor market was by liberalizing temporary contracts. These so-called employment-promotion contracts enabled employers to hire temporary workers performing regular activities and stipulated substantially lower dismissal costs than permanent or open-ended contracts; their termination could not be appealed to labor courts. After working three years at most within the same firm, the employer had to either terminate the contract at no cost or convert it into an open-ended one. That two-tier reform inflated the proportion of temporary contracts to almost 35 percent in the early 1990s, turning Spain into the EU nation with the largest share of temporary employees. Conversion rates into permanent contracts were strikingly low since firms used layoffs as a workaday practice.

From 1992 onwards, a series of EPL reforms attempted to counteract undesirable effects of the 1984 reform. Their aim was to reduce the incidence of temporary jobs either by restricting the use of temporary contracts or by reducing firing costs for open-ended contracts. Subsequent reforms (enacted in 1992, 1994, 1997, 2001, 2002, and 2006) mitigated the gap between the two modes of employment, but the employment market has remained bifurcate. Fixed-term contracts bore mainly on immigrants, as they went from representing 1.3 percent of the labor force in 1996 to 16 percent in 2008; over that period, 61 percent of them were on fixed-term contracts vis-à-vis 33.6 percent of the general population. Employers have been using those contracts mostly as a flexible device to adjust employment in the face of adverse shocks rather than as a screening device under asymmetric information, which has accounted for the low conversion rate of fixed-term contracts into permanent ones.

Spain's elastic, two-tiered employment structure throws light on its economic trajectories both during the boom and during the crisis. In terms of lost GDP, some of Spain's European counterparts were hit harder; in 2009 Germany and Ireland lost 4.7 percent and 7.6 percent, respectively, whereas Spain lost 3.7 percent, lower in fact than the EU average (−4.1 percent). Nevertheless, the Spanish labor market has shed redundant labor at a much faster pace than its European counterparts have. Before the crisis, Spain had played a major role in European employment growth; after 2008, it became associated with unemployment, accounting for 29 percent of EU employment losses from 2008 (3rd quarter) to 2009 (3rd quarter). In macroeconomic terms, Spain has been the epitome of quantity adjustment as a strategy for coping with falling demand: The loss of employment for each percentage point of reduction in GDP was four times higher in Spain compared to the EU average.

By the end of 2011, the unemployment rate had grown to almost 23 percent; toward the end of 2012, it neared 25 percent. The duality of the Spanish labor market has rendered it highly dysfunctional. On the one hand, industrywide bargaining agreements impose unprecedented rigidities such as severance pay of up to 45 days per year of service for dismissal of permanent workers—a level found in no other European country. On the other hand, temporary contracts make it easy for employers to lay off workers during economic slowdowns. Apart from their obvious shortcomings, fixed-term contracts hamper productivity growth over the long haul, since employers are unlikely to invest in temporary employees' human capital.

Even when employment rates and economic growth had spiked, productivity did not rise and competitiveness even deteriorated; productivity

needs to grow as well for the sake of sustainable growth. Raising productivity by increasing human capital and developing a qualified workforce has entailed remodeling the unsatisfactory education system. One of its principal, sad features has been early school leaving. Spain ranks among the leaders in that respect in the EU: 33 percent of 18- to 24-year-olds left school with few or no qualifications and were no longer in education in 2009 while the EU average was only 14.4 percent. The construction boom had lured many young people to leave education in order to work in this sector, but when the real estate bubble burst, they found themselves without work and dependent on welfare benefits. Although university costs in Spain are not high for students, a shortage of skilled labor has developed over the past decade. Spain does not rank high on indicators of education, traditionally lagging behind its European counterparts in PISA tests (PISA is an international study that was launched by the OECD in 1997, aiming to evaluate education systems worldwide every three years by assessing 15-year-olds' competencies in reading, mathematics, and science). In 2009, Spain was again significantly below the OECD average in all respects, as no Spanish university made it to the list of the top 200 universities in the world. Innovation could be another basis for long-term growth, but Spain has been lacking in this regard as well. Small and medium-size enterprises have accounted for more than 80 percent of private employment, but their research and development efforts have been weak, since corporate R&D activities have been concentrated in a group of large enterprises.

The Spanish government is unlikely to put much money into the education system or other social spending, for that matter, anytime soon, having to scale back public spending in order to finance its sovereign debt and meet the Maastricht criteria regarding long-run debt and annual deficit levels taken as debt-to-GDP ratio of 60 percent and deficit-to-GDP ratio of 3 percent. Spain has asked the EU and the IMF for a rescue package. Amid the southern peripheral nations, Spain has had the lowest debt-to-GDP ratio but the highest level of unemployment. In the spring of 2011, there were 1.38 million Spanish families whose members were all unemployed; many had become discouraged and left the labor force. In the following years, the threat of unemployment will continue to loom large in people's lives.

Greece: Footing the Bill for Laxity during the Ostensive Boom Years

For the past four years, Greece has starred in a saga of public finances. However, it has become more and more evident that Greece has not been the only nation in fiscal dire straits (information in this section from

Buiter and Rahbari, 2010; Garcia Pascual and Ghezzi, 2011; Lynn, 2011; Wihlborg and others, 2010; Haidar, 2011; Matsaganis, 2011; De Santis, 2012). Most countries in the EMU fare worse than at any time since the Industrial Revolution, with the exception of wartime episodes and their immediate aftermaths. Problems were not confined to the Eurozone but extended to EU member states not in the zone like the United Kingdom and Hungary, and to Japan and the United States.

The origins of this widespread loss of fiscal control are shared by most countries and can be traced to procyclical fiscal policy during the boom period preceding the financial crisis that started in August 2007. The situation in Greece nonetheless owes much to the unique features of its economy, political institutions, and policies.

Some of the failure to warn ahead was due to misleading statistics produced by Greek authorities that greatly understated its deficits. Since 1999, the Maastricht rules have threatened to slap hefty fines on euro member countries that exceed the budget deficit limit of 3 percent of GDP, whereas total government debt must not exceed 60 percent; the Greeks have never managed to stick to the 60 percent limit and adhered to the 3 percent ceiling alone. However, they did so with the help of blatant balance sheet cosmetics, since creative accounting took priority when it came to toting up government debt. Goldman Sachs, for example, had helped the Greek government mask the true extent of its deficit with derivatives that legally circumvented the EU Maastricht rules, but when the so-called cross-currency swaps matured, it swelled the nation's already bloated deficit.

On October 16, 2009, then-Greek Prime Minister George Papandreou disclosed the nation's severe fiscal problems in his first parliamentary speech. On November 5, 2009, the Greek government revealed a revised budget deficit of 12.7 percent of GDP for 2009, which was double the previous estimate. The incoming government admitted that earlier fiscal data had been misreported. The general government deficit for 2008 was corrected from 5 percent to 7.7 percent (later revised to 9.4 percent) of GDP. Dependence on foreign borrowing heavier than hitherto thought proved fatal: Markets reacted by increasing spreads (that is, interest rate differentials from German government bonds, which for many years had been deemed the safest assets in the world) and by lowering credit ratings. Since then, the sovereign spreads (representing the difference between bond yields issued on international markets by the country in question versus those offered by governments with AAA ratings) rose sharply for most of the Eurozone countries, causing the biggest challenge for the EMU since its creation.

Deep-rooted structural problems at all levels have taken their toll on Greece. Unlike other countries that had managed to curb social and welfare spending without fatally weakening core services and benefits, social spending in Greece soared, usually without visible improvements in outcomes, and reform efforts failed one after another: The welfare state edifice appeared to be unassailable. After joining the monetary union in 2001, Greece experienced a sharp decline in competitiveness as inflation consistently exceeded the Eurozone average, so Greece has been losing market share of exports relative to its EU peers. High administrative costs, high margins across most economic activities, and rising labor costs plagued the Greek economy. Poor governance and regulation has also been a hurdle to inward foreign direct investment (FDI), which has been low throughout these years. Being inefficient and making losses, state-owned enterprises have been a source of fiscal underperformance.

In March 2010, debt-ridden Greece was forced to take tough austerity measures; the EU promulgated that it would closely monitor the nation's efforts to cut its enormous budget deficit and get its public finances into shape. In light of Greece's imprudence and fraudulence, the European Commission, the EU's executive body, criticized Athens for faulty reporting of statistics and put Greece under closer monitoring than any Eurozone nation had ever been before. The announcement failed to placate the markets. In April, Standard & Poor's (S&P) downgraded the nation's credit rating to below investment grade (that is, junk status). As Greece lost access to the international financial markets, the sovereign debt crisis was in danger of evolving into a solvency crisis.

After much procrastination on all sides, an unprecedented €110 billion rescue package was agreed upon with the European Commission, the ECB, and the IMF (dubbed colloquially the "troika"), designed to cover the nation's borrowing requirements for the next three years. The Eurozone members provided €80 billion allocated in parallel with their relative ECB capital shares, whereas the IMF provided €30 billion. In return, the Greek government signed a Memorandum of Economic and Financial Policies ratified by parliament on May 3, 2010. The memorandum forced sweeping spending cuts and steep tax increases to reduce the nation's public deficit to below 3 percent of GDP by 2014. Greece also agreed to austerity measures such as to increase the value-added tax (VAT) rate from 21 to 23 percent, fuel and alcohol taxes by 10 percentage points, and reduce wages in the public sector including pensions and other fringe benefits. The minimum retirement age rose from 55 to 60, and privatization plans have been in store for a number of state-owned enterprises.

On May 4, 2010, protesters rampaged through the streets of Greece's major cities, venting their frustration over the austerity package imposed on the nation by the troika, as it appeared that the economy had gone off the rails as suddenly and violently as a train accelerating into a crash. The brutal and passionate riots encapsulating the fault lines and conflicts within the global economy lasted a few days. Three workers died as extremists set fire to a high-street bank in Athens. It was all to no avail since, in the harsh realities of global finance, when the money runs out, so do the options.

A pension reform and a first round of labor market reforms had been under way, but implementation fell behind schedule. The central government failed to front-load difficult policy decisions such as large cuts to the public sector wage bill, and subcentral governments' budgets proved difficult to control. Fiscal austerity, internal devaluation, and the credit crunch sent the economy into a downward spiral. Since the beginning of the crisis in early 2010 up to the end of 2011, Greek banks lost more than 20 percent of deposits. Now that access to international capital markets has been shut off, banks have had to rely on the ECB funding via regular open market operations and emergency liquidity assistance to the Bank of Greece.

For many months doubts have been cast whether Greece would be able to repay its debts in light of structural problems of its foundering economy, even if its debts would be softly restructured (such as, payments would be delayed and rescheduled while lowering promised interest rates) or even in case of out-and-out default. At the end of 2011, it seemed unlikely that, with interest rates around 15 percent, Greece would be able to return to the capital markets for its lending needs in 2013 and 2014. It was assumed that Athens would require an additional €60 million in loans from the troika. Greek debts have inevitably undergone massive "haircuts" (of more than 50 percent shared by private investors and governments alike, namely European taxpayers), restructuring, rescheduling, and buyback programs whereby Athens has repurchased sovereign bonds for a fraction of their face value. Toward the end of 2012 Greece hit rock bottom as S&P downgraded its creditworthiness again from a "CC" rating to "SD" (selective default).

Light was seen at the end of the euro-crisis tunnel in late 2012, when the European commissioner for economic and monetary affairs, Olli Rehn, proclaimed that the debt and financial crisis afflicting Europe's common currency zone has surpassed its apex (SPIEGEL International, 2012). Analysts expect Greece's rating to return to the "CCC" level. For the first time in the past years, a further "haircut" for Greece appears unlikely, and it seems that Greece has come to grips with its intractable structural problems. During the summer, Eurozone governments and the ECB stabilized the

situation. Strict austerity measures applied in countries like Greece, Portugal, and Spain have reversed the negative trend. The combined budget deficit in the Eurozone fell from 6.2 percent of the currency area's GDP in 2010 to 3 percent in 2012 and a projected 2.5 percent in 2013, so Greece's candid efforts have ripened, starting to bear fruit. Instead of mere crisis management, policy shifted to structural issues across the board, stressing the competitiveness of all Eurozone and EU member states.

Given the structural nature of its economic problems, Greece will go through a slow and painstaking process in the following years. Inefficiencies in government require restructuring and/or privatizing loss-making public entities including more transparency in regard to public accounts and performance. Competition should be enhanced in markets of both products and services. Administrative burdens should be liberalized and reduced for all sectors including network industries, "closed" professional services, and retail trade. Labor market reforms are essential in order to regain cost competitiveness including regulatory changes to: (1) employment protection legislation; (2) the collective bargaining regime to favor wage moderation; and (3) promoting more part-time work to boost participation of the youth and women in the labor force.

Iran: The Paradox of Plenty—Replete with Hydrocarbon Reserves and Yet in a Pickle

The Iranian economy rests on oil revenues. With 10 percent of the world's oil and 14 percent of its gas reserves, Iran's hydrocarbon reserves are second only to those of Saudi Arabia (information in this section from Salehi-Isfahani, 2009; Esfahani and Pesaran, 2009; Marsh, 2009; Esfahani and others, 2012; Feizi, 2008; Mellati, 2008; Jahan-Parvar, 2012). Iran was originally earning small shares of its oil wealth, since the royalties paid to the government of Iran by the British holder of the oil concession amounted to barely 8 percent of the value of oil exports. After the concession had been renegotiated by Reza Shah's government in the early 1930s, Iran's share rose to about 15 percent. Following the 1953 coup orchestrated by the Eisenhower administration, Iran became a U.S. client state. Due to economic embargo, growing confrontation with the West over Iran's oil industry, and political instability, oil revenues dwindled down and investment came to a halt. After a new deal in 1954 that had retained 50–50 profit sharing (companies-Iranian government), Iranian oil was reintegrated into the world oil market.

Since imports outpaced exports by far, the IMF had set in motion the "Economic Stabilization Program" in 1959 to address the balance-of-

payments crisis, followed by a series of reforms since 1963. Several programs redistributed agricultural land away from large landlords, sold the shares of public enterprises, required profit sharing for industrial workers, extended suffrage to women, formed literacy corps, and nationalized forests and pastures. From 1963 to 1976, GDP per capita grew by approximately 8 percent each year. Non-oil GDP per capita rose even faster—by 8.6 percent per year. With substantial improvements in infrastructure and public services such as roads, electricity, water, education, and health, Iran's agrarian-based economy turned rapidly into one mainly oriented toward services and industry. Western Europe became reliant on Middle Eastern energy resources.

After the oil crises of the 1970s, oil no longer followed a pattern of ownership equity. Host countries wanted to gain strategic control over their natural resources and would no longer settle for better contractual terms. Hitherto, a group of Western oil companies dubbed the "Seven Sisters" comprising Shell, AIOC, Standard New Jersey, Socony Vacuum, Gulf Corporation, and Texas and Standard of California had held sway over oil in terms of ownership, development, and delivery. That dominance started to wane when everything from tankers to drilling and engineering services could be contracted or purchased on the open market. The shah had capitalized on that regained strategic control to invest the extra revenues and overheated the economy, so that in the mid-1970s inflation started to climb. Draconian measures soon led to sharp declines in GDP and investment. Public discontent with policies in both economic and non-economic spheres had grown, sparking a revolution that brought down the monarchy and established an Islamic republic.

The 1979 revolution marked the point at which Iran had broken free from foreign management of its oil, becoming the world's most important oil-producing nation that was hostile to the United States and could disrupt other oil supplies traversing the vital Strait of Hormuz. Saudi Aramco, CNPC of China, Russia's Gazprom, NIOC of Iran, PDVSA of Venezuela, Petrobras of Brazil, and Petronas of Malaysia have emerged as the new "Seven Sisters" that succeeded the seven old ones. Governments that have had difficult relations with the United States and the wider West have been the major owners of the sisters, which hold a third of the world's oil and gas production and more than a third of its oil and gas reserves, and jointly develop each other's reserves to the exclusion of other companies and interests. Iran has steered away from dollars and switched mostly to euros and yen paid by China and Japan in order to countervail U.S.-led economic sanctions.

A downturn had already betided the Iranian economy prior to the revolution of February 1979, but following the revolution it went into an out-and-out tailspin that lowered real GDP by almost a quarter of its 1979 Q1 value in the two subsequent years. After the Islamic Revolution fixed interest was banned because of Islamic rules, so firms could not be financed by selling bonds, and there was no advanced system of financial intermediation (for instance, venture capital). Redistributive and political conflicts undermined incentives for production and investment, since the government took over all large firms and all banks and financial companies, restricting trade and capital movements and expropriating property of those believed to be associated with the shah's regime. Protectionism flourished, property rights came into question, and the economy began to witness a major exodus of skilled labor and professionals. From 1980 to 1982, oil revenues plummeted and the rate of inflation rose sharply. The economy was also grappling with political instability and external conflicts. Extreme government control over the economy had not only reduced business incentives, but also created a shortage of raw materials for production. In the early 1980s, nonoil exports dropped to well below 1 percent of Iran's nonoil GDP. The war with Iraq (1980–1988) destroyed property and infrastructure and drained resources away from productive investment. Shortly after the war ended, oil revenues shot up, mainly during the 1990 Persian Gulf crisis. Under Rafsanjani's institutional and economic reform and reconstruction efforts, steps had been taken to dismantle the war economy but the postwar recovery was short-lived.

After a few years of market-oriented reforms, the government liberalized the foreign exchange market and opened up the capital account in 1993. The process had not been managed well, and the nation had quickly accumulated a huge stock of short-term external debt ($30 billion in just two years), followed by a major balance-of-payments crisis in 1993–1994. Economic liberalization was put off, import controls were tightened, the rial depreciated, imports went into short supply, and the economy came to a screeching halt in 1994–1995. Since firms that had borrowed abroad struggled to pay back their debts, the government decided to cover a substantial portion of the losses sustained by the borrowers because of devaluation. As public revenues had fallen and creditworthiness had become low, it was necessary to expand the monetary base. Consequently, the economy stagnated and inflation spiked. The government reintroduced a host of controls on foreign trade and payments as well as on domestic markets.

During Khatami's reign (1997–2005), reforms continued piecemeal when oil prices started to rise in 1999, engendering substantial growth for the first time in many years. In 1998, oil revenues totaled $13 billion; in

2005, oil revenues amounted to $48 billion. Iran established three free trade zones in the Persian Gulf to facilitate trade with neighboring countries and applied to join the WTO, but has been vetoed six times by the United States. In 2002, a new Law for Protection and Promotion of Foreign Investment paved the way for investment in nonoil sectors; between 2004 and 2009, the growth of the economy was around 5 percent per year.

Not unlike elsewhere, growth brought about by oil revenues has been unstable, so Iran has failed to sustain growth for the long haul. Since oil prices tend to falter, one (but not sufficient) measure to extenuate fluctuations may be to set up a stabilization fund to accumulate surplus during periods in which oil prices are high. Durable economic growth entails policies that ensure greater integration with the rest of the world by providing greater opportunities for diversification and substitution in the face of rapidly changing terms of trade. When it comes to the Islamic Republic, previous attempts to stabilize the economy through greater isolation may have done the exact opposite, since extensive interventions in trade and markets have strained relationships of domestic firms and producers with their foreign partners. This has stymied technological exchange and development, putting Iranian firms at a disadvantage.

The Iranian government should enhance its human capital while furthering innovation, entrepreneurship, and thrift; this is the seedbed of sustainable growth. This requires a more flexible labor market and educational reforms. Sustainable growth also stems from a substantive private sector. Long-lasting growth entails additional funds apart from those of the government, tipping the scales from "rent seekers" to people, local or otherwise, with money to invest. The private sector is not merely a passive agent for investing oil revenues; private investors expect reforms that guarantee the safety of their property and enforce contracts. They also need competitive markets, so their product and investment is not threatened by competition from government monopolies. They ask for trade reform and possible membership in the WTO. Finally, they require a highly skilled, educated, flexible, healthy, and innovative workforce.

Even when GDP was growing annually, dependence on rising oil revenues could barely sustain that process for long when deficient technological development has rendered labor, capital, and natural resources unproductive. Iran's labor force had become more educated, which together with declining fertility rates since the mid-1980s was expected to enjoy an unusually high proportion of working-age population in the next few decades. Prior investments in infrastructures in terms of health, education, and transportation, all of which have been necessary to foster

investments that can make Iran more competitive in the world economy, have culminated in demographic transition that could have phased out reliance on oil wealth while hinging more and more upon human capital. Such transition, however, cannot come about absent adequate institutional underpinnings. First and foremost, the legal environment should be reformed to effectively govern and regulate property rights, contracts enforcement, and employment.

When it comes to high and sustainable growth, many developing countries outpaced Iran. With its phenomenal growth rate, China has been growing faster than Iran and has been joined more recently by India and countries in East and South Asia, Latin America, Eastern Europe, and even Africa. Iran has performed poorly even in comparison to most countries in the Middle East and North Africa, many of which have been notoriously lagging. Economic sanctions against Iran have been in effect in one form or another ever since April 1980.

Whether U.S. sanctions against Iran have been effective is debatable. Iran's imports and nonoil exports have become more geographically diversified as the share of G7 countries in Iran's imports has fallen substantially, with the United Arab Emirates and China filling the shortfalls created by U.S. sanctions. The nature and the scope of sanctions imposed by the U.N. Security Council are likely to be limited as all permanent members need to be on board, two of which are Russia and China—Iran's principal trade partners. Iran's defiant stand on nuclear issues may bring forth more sanctions. So far, two Security Council resolutions (number 1737 in December 2006 and number 1747 in March 2007) have restricted Iran's development of sensitive technologies in support of its nuclear and missile programs. The March 2007 resolution has also called upon all states and financial institutions not to provide new grants, loans, or financial assistance to the Iranian government.

Iran has already been engaged in protracted wars, coups d'état, political ferment, and economic upheavals that have taken their societal toll on its citizens. Further sanctions are likely to cripple the economy. The demographic trend may also take a turn for the worse. As of August 2012, the leaders of the Islamic Republic have officially ceased population control and insisted on a larger population even when the existing population faces severe underemployment or unemployment and unfunded social security and health commitments. Given the anemic pace of growth and job creation, such policies lead to more, not fewer, economic and social problems in a 15-year time period. It seems that the near future does not bode well for Iran and its people.

Tax Reforms: Taking for Giving

Historically taxes would be levied on labor, in kind, and on consumption. The bulk of taxes were raised on foodstuffs and are thus indirect taxes, the revenue of which cannot easily be predicted. From the nineteenth century on, governments have shifted to direct taxes mainly raised through income tax and social security taxes. That revenue can be predicted, and it enabled governments to finance the expansion of services beyond the traditional tasks of defense, policy, and justice. Many taxation systems became more progressive by nature, with the marginal tax rate increasing with income. Especially in the three decades since the Second World War, this resulted in decreases in income inequality. However, under the influence of growing beliefs in free markets, income inequality has risen in the past three to four decades (Piketty, 2013). Tax reform is one way of attempting to reduce undesirable levels of income inequality.

Denmark: Searching for the Magic Bullet to Reduce Income Tax Pressures and Labor Costs

Ecological or environmental tax reform (ETR) is used interchangeably. ETR increases taxes on the use of natural resources and on pollution as such or polluting products while lowering other taxes, usually those levied on employment. The rationale is that the tax burden should fall more on "bads" rather than on "goods" such that consumers and producers can modify their behavior according to the signals. Denmark taxed gasoline as early as 1917 (information in this section from Clinch and others, 2006; Dresner and others, 2006; Kloka and others, 2006; Holger and Hansen, 1999; Hougaard Jensen and others, 1999; Smed, 2012; Gwozdz, 2011; Stafford, 2012). Since the late 1980s, environmental taxation has been perceived less as a way to make polluters pay for environmental cleanup or protective measures but rather as a possibly more efficient economic or market-based instrument for environmental regulation as opposed to traditional methods of bureaucratic command and control.

When applying ETR, revenues may be recycled through tax reductions elsewhere (such as income taxes) or used to support environmental projects; otherwise, it may be used for compensation. Many European countries that grapple with high labor costs endeavor not only to lower energy consumption while abating pollution but also to relax the pressure on employment, so by pursuing that double dividend, they hope to reduce

both energy use and unemployment. Some economic studies have begun to question the wisdom of the double dividend theory, emphasizing the uncertainty of secondary gains and how these might easily be outweighed by adverse economic effects of excessive environmental taxation.

In the wake of the first oil crisis of 1973, the government levied energy taxes on electricity, oil, and gas following deficits and poor national balance of payments. In 1985–1986, the taxes were raised considerably to contain national consumption at a time when both prices of crude oil and the USD-rate (exchange rate with the dollar) were falling. Nevertheless, most consumers were unaffected as all VAT-registered businesses had been exempted from energy taxes. Non-VAT-registered businesses such as banks and doctors had to pay the tax along with the public sector, and revenues were not recycled.

In the late 1980s' atmosphere of heightened popular concern about the environment, a broad consensus in parliament was behind the center-right coalition government of the time in taking on a high profile at the international negotiation table, pushing for ambitious mandatory reduction targets, effective implementation, and fair burden-sharing schemes. As part of its strategy to live up to the national CO_2 reduction target, the government introduced a new CO_2 tax on households and businesses alike and restructured energy taxes to better reflect environmental considerations. Chronically high unemployment levels had not abated despite apparent recovery from the 1980s recession; mounting public debts and income tax pressures have borne on the Danish economy for the past 50 years. "Green" taxation was expected to create new public revenue that would enable trimming both top and bottom levels of income tax, rewarding top earners while boosting low-income employment.

An intensive campaign organized by the Federation of Danish Industry raised awareness of the nation's potential loss of international competitiveness if energy prices would rise solely in Denmark. The center-right, traditionally business-friendly government was turned against the idea of a CO_2 tax on businesses. After alternative "green" majorities in parliament had mobilized support, a CO_2 tax was phased in on top of existing energy taxes on coal, oil, gas, and electricity; it was imposed on households from January 1992 and on businesses from January 1993. A fair share was earmarked for subsidizing energy conservation projects of businesses and promoting decentralized power/heat generation and biofuels. A further share served to complete and subsidize the countrywide system of district heating. Although natural gas had been exempted from the new tax, gas companies were allowed to charge prices as if the new CO_2 tax had

been imposed. Since the early 1990s, the European Commission had been airing proposals to levy carbon and energy tax in order to stabilize CO_2 emissions in the community; Denmark was among the first countries to jump on the bandwagon, and from 1992 on it has been cutting down on reimbursements given to businesses for taxes paid on gasoline and diesel.

Between 1994 and 1998, Denmark steered away from global income taxation, which applies a single progressive tax to the sum of the taxpayer's income from all sources, toward dual income taxation, whereby capital income is taxed separately from other sources of income. The marginal taxation of working income was reduced by a total of 2 percent of GDP financed through capital revenues (0.8 percent of GDP) and more "green" taxes on energy, waste, water, and sewage in particular. The piecemeal reform also taxed loopholes and levied new social contributions on both employers and employees. The social impacts of indirect environmental taxation on lower-income groups were compensated by reducing their taxation while increasing child support. The tax reform encumbered households with higher energy and waste taxes in addition to new taxes on water, plastic bags, and gasoline, whereas businesses were barely touched.

In return for the support of the left-wing parties in parliament, the text of the reform package included a commitment to look into further possibilities to impose "green" taxes on businesses. That commitment had been given by the Social Democratic government under the clear condition that the international competitiveness of businesses was to be taken into proper consideration. A committee summoned to dwell on that issue released its final report in early 1995 after hinging upon technical information provided by companies. Since the final definition process became quite responsive to a range of particularistic interests and considerations, almost all processes aside from energy for space heating were entitled to refunds, and in some cases to extra refunds in return for entering into agreements with the Danish Energy Agency with respect to energy efficiency; the CO_2 tax rate climbed, too.

Energy taxes on households rose again in 1999, this time as part of an overall package of economic measures taken to cool the economy that showed signs of overheating. In 2001, the center-left government contrived a budget proposal for 2002 setting forth a considerable rise in CO_2 taxation on businesses. Following the November 2001 general elections, the Liberal and Conservative parties had formed a new right-wing coalition government, and the suggestion was taken off the table. Over the period 1984–2000, green energy taxes expanded much faster than other taxes but still made up only 10 percent of tax revenue.

A large revision of the tax system in October 2011 attempted once again to reduce income tax rates for all people actively participating in the labor market, and to finance this by increasing not only energy and environmental taxes, but also those levied on consumer goods associated with adverse health outcomes. So-called "health taxes" on sugar products, soft drinks, cigarettes, and alcohol increased. Denmark became the first nation in the world to tax saturated fat after imposing a fat tax on the weight of saturated fat in case it exceeded 2.3 percent. Foods such as meat, dairy products, animal fats that had been rendered or extracted in other ways, edible oils and fats, margarine, and blended spreads were affected, so those who manufactured or imported them for domestic consumption were forced to pay more taxes; foods produced for export, on the other hand, did not attract the fat tax.

The tax inflated administrative costs and put jobs at risk because Danes made shopping trips to Germany and Sweden to avoid it. Opposed by farmers, food companies, and consumers alike, "the bureaucratic nightmare" had been short lived as barely a year into implementation it was repealed by the Danish parliament just as the tax ministry canceled its plan to impose a sugar tax on foods with added sugar such as yogurt, marmalade, pickles, and ketchup in January 2013. Denmark has to make do with present "health" taxes on chocolate, sugared soft drinks, and other sweets for the time being.

Belgium: Spurring Unemployed and Low Earners into Labor

Employment policy in Belgium, as in continental Europe at large, has traditionally focused on demand-side measures, probably due to industrial restructuring. In the last two decades, several EU countries tackled the inactivity trap of unemployment and low activity rates from a labor supply perspective through extensive tax cuts. Policy makers have pitched tax and social security contribution rebates to those unemployed or less-productive workers to impel them to take on paid jobs (information in this section from Orsini, 2006; Carey, 2003; Stockman, 2004; Vanleenhove, 2011).

The tax-to-GDP ratio in Belgium had been rising over recent decades from 31 percent in 1965 to 46 percent in 2000, becoming greater than both the EU and OECD averages and leaving Belgium with one of the heaviest tax burdens in the OECD. The share of personal income tax in total taxation grew larger while the share of consumption taxes declined; the share of social security taxes remained broadly unchanged. After a period of stability, the share of corporate income tax rose in the 1990s, reflecting both increases in effective tax rates and a rise in the share of profits in GDP. Compared to the EU average, the share of personal income tax was higher,

whereas the share of consumption taxes was somewhat lower. As early as 1997, the government was concerned about the heavy tax burden in general and on labor in particular, pledging to reduce it bit by bit to the level in the three main neighboring countries.

At the start of the millennium Belgium had a massive tax burden owing to high public spending that was exacerbated by the enormous debt service cost associated with the public debt it had to accommodate. Since international tax competition had limited the scope to which this burden could be imposed on capital income, it fell mainly on labor income. In light of concerns regarding possible adverse effects on the labor market, the government gave priority to lowering the tax burden on labor. The effects of heavy taxation on the employment level of low-skilled workers are harmful; in Belgium, their employment rate has lain just above 55 percent. In the case of single and married women, high taxation has been even more detrimental: According to Labor Force Statistics, fewer than 40 percent of married women with less than secondary education have been in employment.

In 1999, the newly elected federal government catered to low-income earners by cutting employers' share of contributions to social security. The Additional Crisis Surcharge (ACS), which had been laid in 1993 during a budgetary crisis as a complementary tax added to the corporate income tax rate to fund social security, was to be phased out over 2001–2003; personal income tax was to be reduced further over 2002–2005. Motivated by international competitiveness concerns, the government reformed corporate income tax in a revenue-neutral way. These changes to taxation of both labor and capital purported to counteract adverse labor market effects of high taxation in order to make Belgium more attractive to direct investment and for multinational enterprises to declare their profits. After trimming employees' social security contributions for low-paid workers, the government passed a bill to rescind the ACS piecemeal.

In 2001, Belgian parliament reformed the personal income tax by relieving the tax burden and introducing refundable tax credit on low earnings. The reform was set up as a multitier measure estimated to cost €3.33 billion, amounting to a decrease of almost 10 percent in revenues from taxes. It comprised a tax credit for low-income earners, streamlined the marginal tax rates on medium income tax brackets, added job-related tax deductions, and removed marginal tax rates beyond 50 percent. As to couples and families, the 2001 reform raised exemptions for married couples to match those of unmarried couples with a double income, introduced tax cuts for double replacement-income earners except for unemployment benefits, discriminated nonwork from work-related income

in terms of taxation, augmented tax allowances for dependent children, and mandated favorable fiscal treatment of environment-friendly investment. In 2004, a year prior to full implementation, a second reform amended some aspects of the tax regime. A tax rebate for social security contributions of low-skilled employees supplanted the planned tax credit on low earnings, since the former was supposed to be more effective in promoting the employment of the low skilled, because contributions tended to be extremely high even on very low earnings.

In 2007, the Flemish government launched an in-work tax credit, the *Jobkorting*, to spur inactive population into the labor market. The *Jobkorting* attempted to grapple with the unemployment trap, namely, the small financial difference between working and being unemployed due to the high tax wedge that kept inactive people out of paid jobs, as they had no real incentive to undertake salaried work.

"In-work" tax credits, subsidized social security contributions, and transfers conditional upon employment all fall into a group of measures referred to as Making Work Pay (MWP) policies prevalent in many countries under different titles. MWP policies have been designed as hybrid instruments to reshape the link between employment, solidarity, and social justice in the welfare state of the twenty-first century. Such policies aim for economic inclusion; that is, economic mainstreaming of society's most vulnerable individuals with positive feedbacks coming from decreased spending on income maintenance and poverty-related social problems like poor health or crime. More financial resources for the weakest fraction of the population also mean greater social cohesion.

From 2007 until 2010, the *Jobkorting* has been slightly altered. In tax year 2008, the *Jobkorting* gave a tax credit to people who earned more than €5,500 a year. Workers who lived in the Flemish region but earned less than €5,500 a year were not entitled to the tax deduction. Every worker who earned between €5,500 and €21,000 a year received a yearly tax credit of €125. After reaching a yearly income of €21,000, the credit began to phase out as each additional euro earned reduced the credit by 10 cents, so the credit disappeared if workers earned €22,250 a year or more. In the tax year 2009, the formula had not been changed, but the credit did not phase out after reaching a certain yearly income. Every worker who lived in the Flemish region and earned between €5,500 and €22,000 a year received a yearly credit of €300, which was reduced to €250 if the yearly income exceeded €22,000. In 2008 and 2009, the rebate was monthly; that is, every month the worker received a share of the total yearly amount of the tax deduction. In 2010, the yearly amount was given entirely in the second month of the year.

The decrease in the working effort of the population already in employment almost outweighed the increase in hours worked coming from new labor-market entrants. When it comes to changes to the tax system, low-income households tend to be extremely reactive, whereas higher-income households tend to be on average less reactive due to the interaction between substitution and income effect. It also has been found that joint assessment of income for purposes of both taxation and benefit eligibility has unambiguous negative effects on the labor supply of secondary earners, mostly women. While MWP policies can be very effective in promoting the labor supply of the low skilled, the relatively negligible *Jobkorting* led to minor changes in the labor supply, since married women altered their labor supply the most. The tax credit failed to enhance the employment efforts of low earners because it was simply too modest. When designing MWP policies, separating low effort from low productivity may cancel out the negative impact on the hours worked of the population already in employment.

Estonia: Going Flat—An Avant Garde That Has Become a Common Practice

The transition of centrally planned economies (CPEs) to market-based ones in countries in transition (CITs) has affected every sector of the economy with varying degrees of success. Tax reform has been recognized as critical to the success of economic transition. Evidence suggests that the ability of CITs to reestablish economic growth or limit economic decline during transition has been contingent on the scope, speed, and stability of reforms (information in this section from Martinez-Vazquez and McNab, 2000; Ebrill and Havrylyshyn, 1999; Saavedra and others, 2007; Staehr, 2008; Funke, 2002; Funke and Strulik, 2006).

Most CPEs in Eastern Europe imitated the tax system of the Soviet Union in which tax revenues came mostly from profit, turnover, and payroll taxes levied on state-owned enterprises. The private sector was often outlawed and property taxes did not exist. Wage and payroll taxes were withheld at the enterprise level, with revenues generally earmarked to fund social expenditures. Taxation of individual income was relatively unimportant.

At the breakdown of the Soviet Union, the new independent countries had to enact their own tax laws and establish separate tax and customs administrations. Initially, the new countries simply adopted the Soviet tax system that had been modified to include VAT just days before the Soviet Union fell. Instead of handling the transactions of a highly controlled state

sector, the new tax and customs administrations had to deal with more challenging compliance activities of both the emerging private sector and the increasingly autonomous state-owned firms. That shift entailed a new approach to tax policy and a different operational strategy for tax administration. Most of the countries of the Commonwealth of Independent States (CIS) that includes all countries of the former Soviet Union but the three Baltic countries have struggled to adapt to the change in the face of inadequate, declining revenues. The gravity of the situation had impelled the IMF to furnish and support adjustment programs such as the revenue action plans of 1997 that set forth reforms of tax policy and tax administration. The Baltic countries were spared from such programs as they rapidly implemented major revenue reforms at the outset of transition.

A number of countries in Europe and Central Asia have opted for a so-called flat income tax since the mid-1990s, with Estonia taking the lead in 1994. Flat income tax reforms vary from country to country, and none of them represents a literal flat tax on all sources of income. Some countries have implemented a flat rate only on the personal income tax (PIT), others have singled out corporate income tax (CIT), imposing a different rate level on it, and yet others have applied a flat (or proportional) rate at the same level to both PIT and CIT. The overall framework of personal income tax in Estonia has remained in place since 1994, although exemptions and rates have been altered on several occasions; a pension reform has changed the allocation of revenues from social taxes, adding a compulsory contribution for unemployment insurance.

Many countries have promoted investment and economic growth through generous tax allowances at the corporate level. Free capital movements, the EU's single currency, and information and communication technologies increase the mobility of tax bases. Greater exposure to international tax competition has put pressure on governments to lower taxes on mobile capital and shift the tax burden to immobile factors such as labor and domestic consumption.

Flat income tax can be defined as one that levies a flat rate (that is, a proportional rate) on all sources of income of individuals and businesses while avoiding double taxation. When it comes to PIT, this reform provides an alternative to progressive rates whereby higher income brackets are taxed at higher rates, with various exemptions and deductibles that reduce tax liability (the total amount of tax that an entity is legally obligated to pay to an authority). In the case of CIT, applying a single proportional rate to all kinds of businesses aims to lessen loopholes and exemptions that tend to build up over time. Such reform affects many aspects of an economy

including revenue collection, tax compliance, administrative costs, economic efficiency, investment behavior, productivity, labor supply, and income distribution.

After five decades of Soviet rule, in 1991 Estonia regained independence. The nation inherited an inefficient planned economy and large macroeconomic imbalances. Within a decade, Estonia had established a well-functioning market economy and became a leading candidate for EU accession owing to rapid privatization of state companies, a currency board system introduced in 1992, liberal labor market policies, a free trade regime, and a new legal framework for private activity.

Most tax legislation was enacted during the first phase of transition, and for most of the 1990s, Estonia's tax system was stunningly simple. Enacted in 1994, Estonia's original tax code applied a flat tax rate of 26 percent to businesses, personal earnings, and capital gains, with depreciation allowances up to 40 percent for equipment and up to 8 percent for buildings. Additionally, there was a loss-carry-forward possibility over a period of five years, namely a tax provision paving the way for a company to reduce its tax liability by applying a net operating loss to previous years in which it made a profit. When companies paid dividends, they had to pay an additional tax of 26/74 (26 kroons for every 74 kroons) on net dividends, and shareholders received a dividend tax credit. The effect of this credit system was that distributed profits were only taxed at the shareholder's personal rate of income tax and not under a corporate tax.

Personal income tax was levied at a flat rate on taxable income exceeding the basic exemption and other personal tax exemptions. Taxable income comprised income from employment, business income of non-incorporated firms, pensions, interest receipts, rental income, etc. For most taxpayers, taxable income encompassed only labor income from employment or self-employment. A flat income tax rate had initially been set at 26 percent of taxable income in excess of exemptions (1994), but the rate was reduced to 24 percent effective from 2005 and has since been cut further. Indirect taxes in Estonia have been made up of a VAT and various excise duties. The VAT rate has been levied at 18 percent since 1994 with a lower rate of 5 percent levied on medicines, books, and newspapers. The government has imposed excise duties on alcohol, tobacco, energy, and packaging, as well as other taxes on enterprise income, land values, and gambling establishments. Estonia has not levied taxes on property other than land, gifts, inheritances, or wealth.

The 2000 income tax act had turned Estonia's income tax approach on its head and had wider implications for other nations that followed suit.

From January 1, 2000, onward, companies have become subject to income tax solely with respect to distributions. Distributions include dividends and other profit distributions, fringe benefits, gifts, donations, representation expenses, and expenses and payments unrelated to business. The flat tax rate for all distributions has been 26/74 on net dividends. Under the new income tax legislation, corporate entities are exempt from income tax on undistributed profits regardless of whether they are reinvested or retained. The new corporate income tax has not constituted a tax exemption; taxation of profits has simply been contingent upon and awaited their distribution to individuals. Depreciation allowances have become redundant since there have been no taxes on corporate income per se.

A permanent establishment transferring assets to its head office or to other nonresidents has also been treated as distribution. Dividends paid to nonresidents have been liable to taxation at the general rate of 26 percent unless the nonresident legal entity has held at least 25 percent of the share capital of the distributing Estonian company. Capital gains realized by a resident corporate entity (including nonresident permanent establishments) have not been taxed prior to actual or hidden distribution, and have been subject to 26/74 income tax on a monthly basis. When it came to incorporated Estonian firms, capital gains have remained untaxed unless the receiver of capital gains has been an individual, in which case that individual has been liable for 26 percent tax on those gains.

The tax reform seemed to benefit the investment climate and fared quite favorably in the long run. Investment spending is affected by any number of things, notably the timing of the business cycle. When scrutinizing the Estonian investment share from the first quarter of 1993 to the fourth quarter of 2004, it has been apparent that the trend of investment share accelerated after 2000, while the investment ratio had started to abate in the late 1990s. Estonia has witnessed a fresh investment spurt, not least thanks to the tax reform act of 2000. Such empirical evidence tallies with various growth models, which demonstrate that lower taxation unambiguously boosts both investment and economic growth.

It is much harder to establish how changes in the capital income tax rate affect the well-being of households, since consumption and welfare depend on transitional dynamics and on whether the government holds constant its share of GDP, or whether efficiency gains from lower taxation are used to cut back government spending. Only in the latter case is the net welfare gain positive when transitional dynamics are taken into account. Growth literature indicates that lower taxation results in higher steady-state income, but there may well be only minute or even negative welfare gains if the shift

involves large adjustment costs and high foregone consumption. Yet it has been found that the difference in tax systems across countries explains around 30 percent of variance in growth rates. Economists have long speculated that tax policy can affect economic growth, which falls in line with Estonia's 2000 corporate tax reform that has cultivated investment spending.

In international comparisons, the Estonian tax system is well known for applying flat rates and for its overall simplicity. However, personal labor income taxes along with social security taxes and taxes on consumption create a wedge between the costs of employing labor and the purchasing power attained by providing labor. This distortion of the relative price of labor affects labor supply and reduces welfare. Research that had estimated employment and welfare effects of personal labor income tax in Estonia asserted that individuals in the middle-income groups have exhibited higher elasticity in terms of labor participation than that of individuals in the low- and high-income groups. Assuming a utilitarian social welfare function, revenue-neutral tax reform to lessen the income tax burden on lower-income individuals but raise it on high-income individuals may lead to higher societal welfare. Welfare consequences have been nonetheless narrowly defined, overlooking administrative costs, compliance issues, and issues of political economy.

Saavedra and others (2007) focused on revenue effects of flat tax reforms that have become prevalent in Europe and Central Asia. Such reforms appear to have had positive effects on simplicity and compliance, as revenues have neither collapsed nor surged. Impacts have depended on the goals of the reform and its design features such as the tax rates imposed. When collections had dropped more than expected during the first year of implementation, they typically improved thereafter, reflecting either growth in the tax base or better compliance (or both). Oftentimes, reductions in real collections have been purposeful and manageable, having had positive implications for competitiveness and growth. A shift away from direct toward indirect taxes has been noticeable in most countries, taken prima facie as a conscious policy decision likely to boost economic growth.

Comparing Economy, Finance, and Taxation Systems across Nations

In this chapter we delved into the economies of some countries and taxation regimes and trends around the world. As the crisis that started in 2008 pervaded more and more countries and regions, its repercussions became

ubiquitous. Europe was afflicted by the sovereign debt crisis soon after the U.S. subprime debacle, and it seemed no country was spared: "Following the collapse of the American investment bank Lehman Brothers, the financial system had gone into meltdown. Banks had been going bust all around the world. Trade had collapsed at a faster rate than at any time since the Great Depression of the 1930s. The great container ships that sailed from Shanghai to Rotterdam, laden with the mass-produced consumer goods that were the physical manifestation of globalization, were suddenly tethered empty to the docks." (Lynn, 2011, p. 11) In the three Baltic countries whose transition was favorable, during the 2008–2009 global financial crisis, the externally financed domestic demand boom came to its abrupt end and triggered a severe output collapse that brought per capita income levels back to their 2005–2006 level (Purfield and Rosenberg, 2010).

The real protagonists of the crisis have nevertheless been the peripheral countries in the Eurozone known among economists as the "Club Med" countries: Portugal, Italy, Greece, and Spain (also referred to—unfortunately—as "PIGS"), all of which are southern European countries that developed very differently from the industrial powerhouses of northern Europe (Lynn, 2011, p. 59). Many scholars allege that the EMU should never have been born, as it was predicated on the assumption that upon acceptance to the Eurozone the new members would conform to the economic behavior of their (older-member) counterparts. The current crisis exemplifies that by applying "soft" accession rules in the corresponding treaties such as debt and deficit limits, one cannot undo years of history, erase consolidated cultural differences, or abolish entrenched institutional settings. Upon accession to the EU and the EMU, those nations, which conducted their economies prudently and efficiently beforehand (such as Germany), became even more prudent, whereas those nations that lagged behind embarked upon a spending feast under the aegis of the EU. No convergence had come about; instead, the Club Med countries had rather become more economically irresponsible and profligate as they suddenly had "cheap" money from the ECB in spades. The new countries in the EMU diverged economically from the old ones, having had pecuniary means to begin a spending spree. Spain has swollen a construction bubble while Greece tampered with figures to obscure severe ramifications of years of unscrupulous spending, an inefficient and cumbersome public sector, structural rigidities, and corruption.

One way or the other, private investors and taxpayers in the more prudent nations picked up the tab in the name of European solidarity, unity, and cohesion. It remains to be seen for how long hardworking citizens are willing to pull the Club Med countries out of the fire. Spain and

Greece suffer from labor rigidities, underdeveloped human capital, low productivity, overall inefficiency, and lack of innovation and entrepreneurship. Those deeply embedded stumbling blocks are not likely to disappear soon; they are likely to persist, casting a shadow on economic growth. It became evident that pessimists were right to trumpet their Cassandra's prophecies; the members of the monetary union that is the leitmotif of this section had been from the outset too different in too many economic indicators (and in cultural respects)—it could not have succeeded. It has been tantamount to an older sibling bailing out his younger reckless brother again and again rather than a union of equals.

The Germans were fed up since 2013 was an election year, and by all recent accounts (e.g., *The Economist* proclaimed on October 21, 2014 that "the German economy is in a rut") the locomotive of the EU is slowing down, handouts are bound to cease. The hardship facing the EU and the Eurozone in particular is not likely to go away anytime soon. Most researchers contend that the EMU should never have seen the light of day since states have lost their ability to formulate an independent monetary policy (see De Grauwe and Ji, 2012; Haidar, 2011; Neal and Garcia-Iglesias, 2012). Government bond markets in a monetary union are more fragile and more susceptible to self-fulfilling liquidity crises than stand-alone countries that both theoretically and empirically have proved to be immune from these liquidity crises and weathered the storm without increases in the spread (namely, without the interest on their bonds being on the increase in relation to German bonds). Reservations notwithstanding, once the union has been forged it is in the interests of all parties concerned that it remain intact, so markets do not lose confidence in the union as a whole and in the countries composing it (De Grauwe and Ji, 2012; Haidar, 2011; Neal and Garcia-Iglesias, 2012).

In 2010, Angela Merkel, the chancellor of Germany, spearheaded an effort to erect a permanent mechanism to assist other floundering EMU members, begetting the European Financial Stability Facility. Any aid rendered by that mechanism will by no means amount to what was handed over to the Greeks, who have almost bled the union dry. Any rescue plan in the Eurozone would be accompanied by tough fiscal conditionality in order to discourage other Eurozone members from misbehaving fiscally. As assistance is contingent upon rough austerity measures, Spain has avoided asking for a similar bailout package in light of the Greek hullabaloo (Haidar, 2011).

Iran is an example of a nation that has a lot going for it: a good geopolitical stand, human resources, and above all an abundance of hydrocarbon reserves. However, Iran is a quintessential example of the paradox of plenty, as consecutive Iranian governments opted for the facile revenues flowing from oil export but failed to heed other industries or

enhance its human capital via investment in education, technological skills, health, and so forth. The Iranian economy has been subject to the whims of energy prices that are notoriously fluctuant. The money stream from oil that permeates the Iranian economy causes real appreciation and renders other industries less competitive internationally. As human capital is also wanting due to protracted government neglect, Iran lacks the underpinnings of sustainable growth. Over the years, Iran has preferred to hold onto its mass destruction weapons and nuclear plans while overlooking the repercussions of its conduct upon its citizens. Iran's geographic location as well as its natural and human resources has put it in an advantageous position to play the global game and seize opportunities for growth and development. Iran nonetheless adheres to its offensive international policies and retains its seclusion. Iran is less dependent on the West than half a century ago owing to its prominent Asian trading partners. Yet Iran is reliant upon trade, import, and export, so its population bears the consequences of its aggression. An unfriendly business environment in addition to underdeveloped human capital and infrastructure scare potential investors away, staving off the holy grail of foreign direct investment. Iran stands out blatantly in this respect, since most countries bend over backward to create a business-friendly environment in order to attract foreign investments in a highly competitive global market. Belgium and Denmark have been mentioned in this chapter as countries that undertook to lower labor costs so that multinationals and potential investors do not take their businesses elsewhere. By the same token, Estonia has pretty much reduced its corporate tax rate to 0 percent. Although many countries epitomize the "resource curse," Iran seems to be sui generis in terms of its unrealized potential.

Romania exemplifies a nation that mounted the globalization wagon to reap the benefits of Europeanization. Unlike the Baltic countries, Romania has been bearing the harvest of its past communist, despotic past. Despite government action plans accompanied by financial assistance from government, private sector investments, and grants from the EU, it has been struggling to modernize its economy, and inter alia its salient agricultural sector. This substantive sector in terms of contribution to GDP, people employed, and poverty alleviation proved hard to reform when compared with quick structural adjustments in other transition economies. Indeed, it has tallied with painstaking transformations of the political system, the public administration, and various sectors of the economy that are still under way. A country's institutions can either facilitate or encumber transition and accession to the EU. In the agricultural sector, there had been positive signs in the past few years as Romania managed to alleviate poverty, including rural poverty, even if to a lesser extent (Salasan and Fritzsch, 2009).

Resource mobilization lies at the heart of economic development. Among various means of resource mobilization (such as forced savings, inflation tax, manipulation of terms of trade, and so forth), tax is closely related to questions of state formation and capability. Tax provides one of the principal lenses in measuring state capacity, power, and political settlements in a society. The determinants of tax collection and tax reform have been the subject of extensive analysis. Several theoretical approaches inform debates on two main issues. First, why does tax collection increase over time? Second, should the main concern be efficiency or equity when designing tax systems (Di John, 2006)? Estonia has clearly opted for the former rather than the latter when it inaugurated a flat income tax as early as 1994.

Tax reform has been a central part of World Bank and IMF operations in structural adjustment reforms in numerous transition economies (Di John, 2006; Ebrill and Havrylyshyn, 1999). Estonia waived progressivity and redistributive effects in favor of simplicity and efficiency. Owing to policy learning and diffusion of "neoliberal" ideas, policy makers learned that high tax rates combined with selective investment incentives are ineffective in the sense that they lead to inefficient allocation of resources, unfairness, and administrative complexity. Estonia's actions to reverse progressive income taxation, cut rates, and broaden the tax base while eliminating tax expenditures have all become part and parcel of the neoliberal economic orthodoxy such as the "Washington consensus." (Ganghof, 2005; Owens, 2005; Swank, 2003)

Unlike many other countries in transition, Estonia's smooth transition did not entail a dire need of IMF or World Bank interventions because its history, culture, and viable modern institutions were in its favor. Estonia nonetheless did not stand still following its lustrous 1994 reform. At the outset of the current millennium, it launched a second tax reform to reinvigorate its flow of foreign direct investments. By doing so, Estonia managed to revamp its business environment with a new spurt of capital investments after the previous one, which had started at the beginning of the 1990s, receded.

In terms of compliance, efficiency, welfare gains, productivity, competitiveness, and revenue collections, Estonia's successful reform impelled many countries to follow suit, most of which are CIS countries (Commonwealth of Independent States, which had been Soviet Socialist Republics in the Soviet Union prior to its dissolution in December 1991), or former Soviet bloc countries. This attests to tax competition in the region and shows that people who suffered under communism are less susceptible to class-warfare rhetoric about "taxing the rich." Thus far, Estonia has been a beacon inspiring similar flat tax reforms in countries such as Latvia, Lithuania, Russia, Serbia, Slovakia,

Ukraine, Romania, Georgia, Iceland, Mongolia, Kyrgyzstan, Macedonia, Montenegro, Mauritius, Albania, the Czech Republic, and East Timor (Mitchell, 2007). It seems the last word has not been said yet, as proposals for flat tax reform continue to be paramount across the globe, though the matter is not so simple. Fuest and others (2008), for example, assert that flat tax reforms are unlikely to spill over to the grownup democracies of Western Europe; their simulations of a flat tax reform in Germany revealed very limited efficiency effects at best but problematic distributional impact.

Economic growth results from more factors of production, labor, and capital and higher productivity in the use of those factors of production. Since labor is an important economic input, *ceteris paribus* higher employment rates will lead to higher GDP. High taxes on labor nonetheless discourage both labor demand (by raising labor costs to employers) and labor supply (by lowering the real consumption wage of workers). They create a "tax wedge" between labor cost to the employer and the worker's take-home pay and thereby reduce both employment and economic growth (Rutkowski and Walewski, 2007). The main thrust of most tax reforms has been to increase GDP and hence growth by prompting unemployed and low earners into labor without pulling down the amount of working hours of the more productive high earners. Balancing those two countervailing tendencies may turn out to be almost impossible, as the point in which low earners and unemployed are boosted to work more without the high earners withdrawing and working less is very subtle and elusive. Estonia has managed to increase societal welfare; reducing the tax burden on low-income individuals spurred a substantial labor participation response and increased welfare amid them, whereas high-income individuals experienced only a modest reduction in employment and welfare (Staehr, 2008). Belgium, on the other hand, missed the delicate equilibrium point as the *Jobkorting* introduced by the Flemish government failed to increase general welfare and, *a fortiori*, the welfare of those whom it targeted: Joint assessment of income (for couples) for both purposes of taxation and benefit eligibility had unambiguous negative effects on the labor supply of secondary earners, mostly women. Furthermore, the increase in hours worked coming from new entrants was almost outweighed by reduction in the working effort of the population already in employment (Orsini, 2006). The tax credits were too modest to enhance low earners' employment efforts (Vanleenhove, 2011).

Another quandary stems from taxation of capital versus labor, since the size of income tax relative to other types of taxes (that is, the tax mix) may influence policy makers' ability to maintain high social expenditures (Kato, 2003, cited in Ganghof, 2005). On one hand, high taxation of labor may raise

labor costs for employers and reduce employees' incentives to take on work; it may also compromise the economy's competitiveness in the international arena. On the other hand, taxing capital too highly is very risky in the age of footloose capital that moves quickly and freely across borders and continents. Nations strive to attract as much foreign direct investment as they can and to keep capital and industries at home. One way to realize that is to provide a healthy, educated, and innovative workforce, so governments should invest in their citizens' human capital. A complementary measure is a favorable, business-friendly environment such as low taxes on capital and investment revenues. Estonia resolved this dilemma via an elegant design of taxation whereby personal income is taxed at a flat rate regardless of origin, be it labor, rent, dividends, etc. Consolidating income from all sources gave rise to an efficient and simple system that many countries endeavored to replicate (Funke, 2002; Funke and Strulik, 2006; Staehr, 2008). A 0 percent rate of corporate tax (since profits, whether retained or reinvested, are not taxed prior to distribution) induces a favorable environment for investment and capital that most countries can only dream about (Funke and Strulik, 2006). Belgium is almost an antipode of Estonia as it espoused a multilayered, intricate tax reform comprising many components, some of which have been at odds. Belgium embarked on a long process to lessen harmful labor-market effects of high labor income tax to make the country a more attractive site for direct investment and for multinational enterprises to declare their profits (Carey, 2003), with partial success.

Denmark has also been engaged in a lot of trial and error, giving rise to a patchwork quilt tax system, quite the opposite of the simple Estonian one. Denmark phased in tax reform between 1994 and 1998 that rendered it the first Nordic nation to move away from global income tax, wherein a single progressive tax schedule is applied to the sum of the taxpayer's income from all sources, toward a system of so-called dual income taxation, wherein taxation of capital income is separated from that of other sources of income. As opposed to traditional bureaucratic "command and control" methods, Denmark ventured to use environmental taxation as an economic or market-based instrument for environmental regulation, hoping not only to abate pollution but also to reduce labor costs and taper unemployment. Denmark has imposed energy taxes on electricity, oil, and gas. Those were highly criticized, since they have been paid not only by lax, profligate users, but also by stringent users, which casts doubt on their ability to induce frugality and thrift with respect to energy use. Like Belgium, Denmark has used energy taxes to generate new public revenues that would enable a general reduction of top and bottom levels of

income taxes, rewarding the contribution of top earners better while boosting low-income employment (Kloka and others, 2006). Fearing that lower labor costs would be offset by loss of international competitiveness that would arise with a unilateral increase in the price of energy in Denmark, a fair share was earmarked as direct subsidies for energy conservation projects, decentralized power/heat generation, and biofuels. A further large share went to investment subsidies aimed at completing the countrywide system of district heating. It is impossible to gauge the impacts of the Danish reform due to its complexity and the fact that growth and employment are contingent upon many factors that are impossible to extricate, such as the global business cycle, energy crises, and so on. Denmark resorted to a "fat tax" in pursuit of a healthier population, making healthier nutritional choices, and enjoying greater longevity. The tax has been short lived and withered on the vine. It was cumbersome bureaucratically and expensive and failed to yield desired outcomes as frustrated Danes went to buy the "forbidden goods" in neighboring countries. Food producers had no incentive to produce leaner food products since the proportion of fat was estimated roughly—not measured and calculated exactly for each and every product. Barely a year into implementation at the end of 2012, the Danish parliament rescinded the fat tax. When the fat tax was obliterated, the tax ministry also renounced its intention to introduce a sugar tax, grasping that it takes more than a tax to subjugate a craving for fat and sugar and that such taxes may rather trammel Danish industry and competitiveness, which may raise unemployment (Stafford, 2012). At the end of the day, both Danish and Belgian policy makers had to come to terms with the fact that quite often, people will not readily change their behavior and preferences, so simple pecuniary measures will not do: Low earners with poor human capital are unlikely to rush into the labor market.

Taxation will remain a tall order as governments struggle to juxtapose employment with welfare, to counterbalance a friendly environment for capital with favorable conditions for employers and employees, and to inspire desired behavior without hampering competitiveness but paying heed to equity and societal cohesion.

When it comes to economy, taxation, and government expenditures as opposed to revenues, humanity has been vacillating since ancient times. The distribution of national wealth is an issue of only the past 150 to 200 years or so, while the redistribution of international wealth is of even more recent origin. In the near future, those issues will continue to loom large mainly with respect to the current global crisis; it looks as if the world is not out of the woods yet.

SOCIAL-ECONOMIC SERVICES

Energy Management, Planning and Zoning, Industry and Trade

In this chapter we discuss a variety of socioeconomic services and the transformation they faced across a selected number of countries in recent decades. We begin with governmental policies for the management and storage of energy (fossil fuels, solar and wind energy, nuclear energy, and so forth) and natural resources, and move forward to discuss planning and zoning as well as industry and trade. We will pay specific attention to water and other natural resources management policies. We also consider that industrialization in the modern world, and in its slipstream the intensification of international trade, has been among the prime explanations for the growth of government.

Major analytical and comparative questions are few. For example, how important has industrialization been in the development of the Western world? Is it of equal importance in the non-Western world? What policies have governments pursued to both support and constrain industrial development? Attention will be given to the role and position of international organizations (World Bank, International Monetary Fund, World Trade Organization) in relation to the impact of sovereign states. Finally, massive urbanization occurred in the Western world at the same time as industrialization. Living conditions in the rapidly growing towns and cities were such that local governments had to intervene and cater to expanding populations with housing, zoning, and public health policies. Some countries had

such policies for centuries (for instance, the Netherlands since the late sixteenth century), but they became widespread from the late nineteenth and early twentieth centuries on. Also, industrialization required that towns had to be connected by roads better than the dirt roads characteristic of the premodern world. What government policies exist to spur investments in infrastructure (roads, canals, railroads)? For each of these three areas (energy management, industry and trade, and planning and zoning) we will discuss the structure, culture, administrative types, and recent reforms.

The chapter will then be concluded with another comparative look into segments of socioeconomic differences amongst nations and cultures. The sphere for comparison is again immense, and no complete or detailed comparison is possible in a single chapter—but it is still a glimpse into one of the most prominent and influential roles of the modern state, the role of managing our natural resources and hence contouring the terrain of planning, trade, and industrial progress.

Energy Management

In many places across the globe people depend upon a reliable energy supply from various sources (water, gas, oil, wind). Energy supply is one of those fairly recent "kids" on the block of government-run or government-regulated enterprises. Indeed, energy policy and management date back to the nineteenth century, and in various places around the world we have come to the point that we almost take it for granted. Should energy supply be regulated and managed by governments, by private companies, or by a mix of public and private providers?

Russia: The Kremlin's Bear Hug

After the Soviet Union collapsed in the early 1990s, most Western economists prescribed a wholesale "shock therapy" comprising price decontrol, a stable currency (made possible by small budget deficits), hard budget constraints on state-owned firms, and rapid privatization of state-owned enterprises (unless stated otherwise, information in this section from Black and Tarassova, 2003; Woodruff, 2006; Ahrend and Tompson, 2005; Goldthau, 2008). Thereafter, enterprises had been practically handed out to oligarchs who often stole much of the purchase price from the government or diverted it from the enterprise. The World Bank (2002) bluntly declared that the highly corrupt one-at-a-time sales of Russia's

largest enterprises had been "universally regarded as a poor choice of a privatization strategy."

Privatization of enterprises has both direct and indirect effects on economic performance, so a hostile business environment has undermined incentives to restructure privatized enterprises and create new businesses to generate extra profits. Against a backdrop of extensive corruption, organized crime, a punitive tax system, and an unfriendly bureaucracy, there was little evidence of productivity improvement in privatized firms compared to their "corporatized" (but still state-owned) counterparts by the end of 2000. However, there was some evidence of negative indirect effects in terms of internal changes in privatized firms.

First, oligarchs turned out to be major corrupters of government, so an already corrupt government became even more so. Second, rampant corruption with regard to privatization, massive transfers of wealth to a limited number of well-connected insiders, lack of any significant benefits to ordinary citizens from voucher privatization (which had been promoted as returning the country's wealth to the people), spiking poverty and unemployment, and dropping real wages for most of those who kept paying jobs prompted a political backlash against economic reform. Third, oligarchs joined forces with managers of privatized enterprises and corrupt government officials to oppose many institutional reforms cardinal to sustainable economic growth. The conventional wisdom stresses the importance of market-supporting institutions; absent such institutions and in light of the Russian experience, the World Bank has qualified its strong pro-privatization stance.

Russia owned 26.6 percent of the world's proven gas reserves by 2005, and 6.2 percent of the world's proven oil reserves; it accounted for 21.6 percent of global gas production and for 12.1 percent of global crude oil production (British Petroleum, 2006). Regardless of takeovers, the Russian state did not manage to preside over domestic oil production wholly; the Kremlin has been able to "steer" the oil industry for political purposes only indirectly via tax incentives, export regimes, pipeline access, predetermined auctions on new fields, and the like. In the olden days, the Russian market had been dominated by 10 vertically integrated oil companies controlling 95 percent of Russia's crude production and more than 80 percent of its refining capacity. The Russian state now controls a significantly higher share of the domestic oil industry than it did during the 1990s. Still, state-controlled companies have accounted for around only 25 percent of the country's oil production and around 16 percent of its refining capacity due to a series of takeovers of private companies by state-owned Rosneft and Gazprom.

Somewhat octopus-like, Gazprom owns a vast array of holdings in sectors such as banking, insurance, agriculture, mass media, and construction. Since Gazprom must closely coordinate its activities in all spheres with the authorities, it can sometimes be difficult to identify where the state budget ends and Gazprom's begins. Even company officials acknowledge that Gazprom operates in many ways as a quasi ministry. Regardless, the Russian domestic oil market is fairly competitive with prices determined by world markets and by the taxation policies of the Russian government.

Russia holds the world's largest gas reserves, emerging as the most important supplier to Western and Central Europe where it has covered up to 100 percent of imports for some countries. This dependence will become even more pronounced in the near future when depleted European resources need to be compensated by higher imports—also from Russia. Since exploration of gas fields and pipeline construction are extremely expensive and time consuming, producers and consumers engage in long-term contracts that usually cover 20 years or more and entail destination clauses to prohibit secondary trading. Based on these take-or-pay contracts the producer is able to invest in a multibillion-dollar project, as there is a constant and reliable return on investment. In addition, gas is a regional play transported almost exclusively via pipelines. If either the producer or the consumer wants to opt out (exit) and start dealing with an alternative contractual partner, he has to make a high additional investment to build a new pipeline. Given extremely high upfront costs it becomes very costly for any involved party to leave an established bilateral contractual gas relation. A quick look at the dense pipeline grid connecting Europe and Russia reveals that neither side can be interested in dumping all the money each has invested; nor do they have a real choice. Hydrocarbon sales account for a major part of state revenues; the total share of government revenues stemming from hydrocarbon sales has more than doubled during the past four years, amounting to almost 40 percent in 2006 (IMF, 2006). Oil and gas have made up about 20 percent of Russian gross domestic product (GDP) (World Bank, 2006). The heavily regulated Russian home market forces Gazprom to adopt aggressive pricing strategies in transactions with foreign markets (International Energy Agency, 2004).

Russia is a highly inefficient user of energy, using 3.2 times more energy per unit of GDP than the EU-25 (the 25 European Union member states), most of this as gas (accessed 2/2013). Domestic Russian gas prices are only a fraction of prices charged on foreign markets, amounting to only 17 percent of Western European gas prices in 2006; 29 percent when taking into account transit charges (www.ubs.com/investmentresearch). Gazprom earns

virtually all its profits from exports to Western Europe although this market only accounts for 25 percent of total production. In turn, if accessible foreign markets are not attractive for some reason, Gazprom tries to render them more profitable and raises prices if it can. In case a country is unable to pay the new price, Gazprom accepts in-kind payments, including shares of national or regional gas providers or pipeline grids—assets it would otherwise have to buy as an integral part of its expansion strategy. Gazprom uses its control of the domestic pipeline grid to restrict third-party access, and by doing so it prevents independent producers from exporting gas. Private gas companies have therefore little incentive to invest in upstream projects. After heavily subsidizing its former Soviet allies throughout the past 15 years, Gazprom has increased gas prices in the Commonwealth of Independent States (CIS) countries and pushed to equalize them, net of transit fees, along with those it charges its Western European clients. This policy has resulted in several gas disputes with neighbors such as Ukraine and Georgia.

Germany: Renewable Energy Sources Come to the Throne

When it comes to corporate culture in Germany, Shonfield (1968) coined the term "alliance capitalism" to portray collaborative relationships between commercial entities; success has relied on concerted orchestration of large resources for common goals. The German Energy Supply Industry (ESI) has been embedded in that alliance, having had powerful ownership links with major financial and industrial interests in Germany. Already before 1990, the German ESI, one of the industrial pillars of Europe's largest manufacturing economy, had been partly privatized and later on opened to foreign investors. With its huge turnover, vast profits, and monopoly status, the ESI grew into the major cash cow of the German economy. Its political status was consolidated by links to state bodies at all levels, having shared revenues with German municipalities by way of generous concession fees (information in this section from Lauber and Mez, 2004; Schumacher and Sands, 2006; Huber, 1997; Jahn, 1992; Ristau, 1998).

Electricity regulation in Germany has hinged on a mix of public and private law. The Energy Supply Industry Act of December 1935 laid down the groundwork for a cheap and secure electricity supply, circumscribing the state's control of the sector for more than 60 years. The Monopolies Act has been yet another noteworthy law in that regard because it exempted electricity supply. Contracts for concessions, territorial boundaries, supply to special customers, technical conditions for feeding surplus electricity into

the grid, reserve deliveries, and other arrangements have all been based on private law.

Numerous vain attempts at reforming Germany's energy sector came to a head during the Chernobyl disaster in 1986. Following reports warning of a climate catastrophe, Chancellor Kohl declared in March 1987 that the climate issue represented the most important environmental problem. Within two years, opposition to nuclear power increased to over 70 percent while support barely exceeded 10 percent.

Electricity Feed-In Law for generation from renewables was only one of several measures taken in the late 1980s to create markets for renewable energy sources (RES-E) technologies. Those steps included the 100/250 megawatt (MW) wind program, the 1,000 solar roof program, and establishing a legal basis for utilities to pay higher costs for RES-E than were "competitive" in the distorted marketplace that ignored external costs for practical purposes. Under the 1,000-roof program, applicants received 50 percent funding of investment costs from the federal government plus 20 percent from the state (*Länder*) government between 1991 and 1995, equipping 2,250 roofs with photovoltaic modules that led to about 5 MW of installations (Staiss 2000, pp. 1–140 referenced in Lauber and Mez, 2004). In terms of wind energy, a program to subsidize 100 MW of wind turbines, which later was augmented to 250 MW, had been legitimated by the need to gain practical experience with different approaches under real life conditions.

The 1990 Feed-In Law required electric utilities to connect RES-E generators to the grid and to buy the electricity at rates of 65 percent to 90 percent of the average tariff for final customers. Generators were not required to negotiate contracts or otherwise engage in much bureaucratic activity. Together with the 100/250 MW program and subsidies from various state programs, the Feed-In Law gave considerable financial incentives to investors, although less so for solar power due to the latter's high cost (Hemmelskamp, 1999 referenced in Lauber and Mez, 2004). These incentives spawned markets, expanding wind-energy systems from about 20 MW in 1989 to over 1,100 MW in 1995 (Advocate General Jacobs, 2000). Due to an intense battle between politicians, conventional electricity generators, and numerous industries with vested interests, between 1996 and 1998 markets for wind turbines stagnated. However, when it became clear that feed-in rates would remain unchanged, the turbine market expanded apace and large firms entered into the business of financing, building, and operating wind farms. Turbines have been privileged under the construction code that has compelled local communities to appropriate zones for

wind power, stressing public information; training in architecture has been reformed accordingly.

The Renewable Energy Sources Act of 2000 has repealed and supplanted its Feed-In Law precursor, endeavoring to double RES-E production by 2010. In many respects, the law brought improvements for generators in terms of rates and security. It also stated unequivocally that RES-E compensations should take external costs of conventional generation into account and support an industrial policy aiming at the long-term development of renewable energy technologies.

California: A Calamity Precipitated by Deregulation

A "utility consensus" prevailed between the 1920s and the 1970s when natural monopolies had dominated the United States and investor-owned electric utilities were regulated to substitute for competition. The regulatory approach espoused in the United States granted individual companies exclusive franchises to provide power within specific geographic areas as long as their rates were regulated by state regulatory commissions based on the cost of providing service including a reasonable return on investment. California's three investor-owned utilities were Pacific Gas and Electric Company (PG&E), Southern California Edison Company (Edison), and San Diego Gas and Electric Company (SDGandE). The California Public Utilities Commission (CPUC) was erected in 1911 to regulate these companies and guarantee service to customers at "just and reasonable rates" (information in this section from Duane, 2002; Hirsh, 1999; Clark, 2001; Clark and Lund, 2001; and Wolak, 2003).

The Public Utility Regulatory Policies Act (PURPA) of 1978 challenged "the monopoly control enjoyed by regulated utilities." Section 210 of the act allowed "qualifying facilities" (QFs) that either were run on renewable energy sources or burned fossil fuel more efficiently through co-generation. PURPA had little impact in most states as industry-captured regulatory commissions protected monopolies' vested interests. Notwithstanding, California's aggressive response to PURPA yielded the largest number of nonutility-owned QFs in the country, which turned out to be an institutional precursor of the California crisis. Many of the new nonutility generating units were cheaper to build and operate than new large-scale utility facilities. Such extensive decentralization set the stage for further deregulation. The California experiment culminated in a series of legislative steps initiated by the CPUC but taken on by the California state legislature to deregulate and restructure electricity supply from 1992 to 1995.

Following passage in the 1996 legislative session of the Electric Utility Industry Restructuring Act (Assembly Bill [AB] 1890), two independent bodies were established in order to run the California system: (1) the California Power Exchange (PX), a single "transparent" market where all purchases and sales were compelled to go; and (2) the Independent System Operator (ISO), intended only to ensure transmission integrity by running the transmission system for the utilities that continued to own the transmission system itself.

The PX was structured as a day-ahead market where buyers and sellers would submit bid curves indicating how much power they would be willing to buy or sell at a series of prices. Sellers realized that the ISO would pay higher prices than the utilities would pay in the PX if there were a desperate need to buy more power to keep the grid operating. Sellers migrated from the PX day-ahead market to the ISO real-time market whenever it appeared that the ISO would need to buy power at the last minute the next day. Oftentimes the ISO had to buy power for delivery on the same day or even the next hour. By functioning as a market rather than a transmission system manager, the ISO ceded infinite market power to sellers. Buyers could gain from last-minute competition whenever there was surplus power in the market, but sellers were in the driver's seat under conditions of scarcity.

During the four-year transition from 1998 to 2002, the utilities were allowed to collect more revenues from ratepayers than was necessary to recover their past investments. AB 1890 also froze residential and small commercial customers' rates. Those safety valve provisions allowed utilities to recover costs higher than the frozen level, so they transferred billions of dollars to their parent corporations and affiliates from April 1998 to April 2000. Customers were allowed to shop around and change providers, but there was very little incentive to do so: Nonutility retail providers were bound to pay a Competitive Transition Charge (CTC) toward the utilities' standard costs, while existing utilities were apprehensive of long-term contracts with customers they may not be able to retain as soon as the transition period ended. The utilities sold off nearly their entire fossil-fired generation systems, one-third of the total generating capacity installed in the state. The $3.3 billion earned on the asset sales were fed by the utilities to their parent corporations (filling shareholders' pockets) rather than to ratepayers.

Competitors started to withhold power physically since this meant windfall profits in case the ISO called them with an urgent need for their power. Benign weather conditions that boosted low-cost hydropower onto the California market masked the growing threat of scarcity when economic growth and demand boomed. From May 2000 on, SDGandE customers

reeled under doubled utility bills that threatened the regional economy. PG&E and Edison had been losing money due to the rate freeze, and in September 2000 were forced into bankruptcy.

On November 1, 2000, the Federal Energy Regulatory Commission took some mitigating measures, but its proposed remedies were too little and too late. During the system's free fall in the winter of 2001, the state stepped in through its Department of Water Resources (DWR) to buy power on behalf of the cash-strapped utilities, after sellers had insisted on a "creditworthy" buyer. The "shortages" that caused rolling blackouts were an institutional artifact of the market structure rather than a physical phenomenon. Three rolling blackouts, for example, occurred during a month when the daily demand for electricity was near its lowest annual level. First intended as a temporary measure, the bills continued to soar and the state DWR picked up the tab to keep the lights on. Based on an estimated original cost of $43 billion over the life of signed contracts, California committed to pay roughly twice the actual unmanipulated market value of electricity.

The state has faced a continuing fiscal crisis and insolvency as California taxpayers and ratepayers have been paying for the electricity predicament in mounting electricity bills, higher taxes, a weaker economy, poorer schools, more children without adequate health care, more crowded and dangerous roads, more crime, and closed parks. The public provides the money, whereas the private sector provides the monopoly power to keep the lights on; since no part of the system is owned or controlled by the public, for control is buried in an insular, patronizing bureaucracy, the system is highly unlikely to be responsive to public concerns. The California electricity market illustrates how deregulation might transfer wealth from consumers to generators and traders, improving neither efficiency nor social well-being; history and technical understanding demonstrate that it is an industry too susceptible to abuse to be left free of regulatory oversight.

India: A Public Leopard with Private Spots

Since 1991, the Indian economy has undergone a quiet economic revolution aimed at restructuring its basis. Liberalization evolved piecemeal and did not skip the power supply industry (information in this section from Jenkins, 1999; Chong, 2004; Reddy, 2001; Hansen and Bower, 2003; Joseph, 2010). Reforms with respect to power supply industries share some traits such as unbundling of vertically integrated utilities, change from public to private ownership, evolution of a competitive power market, and establishment of independent regulatory bodies. The main thrust has been to

engender a vibrant power sector while minimizing government spending and protecting consumer interests.

British colonial administrators decentralized electricity infrastructure in India during the early twentieth century principally to support British industrial concerns and cater to ruling-class families in the major cities. The Indian constitution grants joint responsibility for managing the electricity sector to the central and state governments. The legal and regulatory basis for the management of the sector has derived from the Indian Electricity Act (1910), the Electricity Supply Act (1948), the Electricity Regulatory Commissions Act (1998), and the most recent one, the Electricity Act (2003). The sector has been fraught with ongoing theft and corruption, and the pricing structure has been garbled and biased due to vested interests of consumers, such as those in the agricultural sector who pay subsidized prices or nothing at all. The central government has generated approximately 30 percent of the Indian capacity over the last 10 years, all of which has been managed by three public companies erected after amendments to the 1948 Electricity Supply Act: National Hydel Power Corporation, National Thermal Power Corporation, and Nuclear Power Corporation.

The 1948 act had allowed states to create generating companies; by the late 1950s, all state governments established State Electricity Boards (SEBs). The 1998 act instituted an independent regulatory commission at the federal level and allowed each state to set up State Electricity Regulatory Commissions (SERCs). The 2003 act mandated each state to have a SERC, vesting them with responsibility for determining the tariffs to be charged to different classes of customers and the tariffs for and functioning of intrastate transmission. This World Bank-led phase of the late 1990s and early 2000s inaugurated an era of unbundling: SEBs have started to separate generation, transmission, and distribution functions and forge SERCs. Ostensibly separate from politics, these commissions still did not manage to change pricing.

The three Public Sector Units (PSUs) were able to sell electricity to the states alone; when SEBs faced shortages, the proportion allocated became a bone of contention. SEBs insolvency, combined with politicians' inability to commit to policy reforms at a time when consistent and reliable electricity was most needed and poor quality electricity, prodded industrial consumers to exit the state-run sector and set up their own on-site facilities to generate power. Private electricity companies came about owing to the 1991 legislative amendments that had permitted private investment, including foreign investment, in electricity generation plants. Industrial groups were allowed to build their own captive power plants to produce electricity for their own consumption.

Over the past decade, the Indians have aggressively solicited international independent power producers (IPPs) in order to persuade them to invest in new generating capacity. IPPs have been reluctant to do so mainly because most SEBs had a history of not paying for power in a timely manner. Foreign firms have been dissuaded by their past experience of dealing with India's multilevel and ineffective bureaucracy, high taxes, and unremunerative tariffs. Problematic and insolvent SEB was a leitmotif in the emblematic Enron mishap. In June 1992 Enron had started to build a power plant in Dabhol, in the western Indian state of Maharashtra. In 2000 the plant began supplying the Maharashtra SEB. Pricing issues arose immediately as the charge for the power supplied by the Dabhol plant was higher than what the Maharashtra SEB paid to the state-run facility. In December 2000 the Maharashtra SEB stopped purchasing power from the Dabhol plant. Back then, generators could only sell directly to SEBs within a single-buyer model that enabled them to sell solely to a given state with no option for cross-border generation. The corollary has been a shutdown of the plant in May 2001 while Enron has cited over $1 billion in lost costs.

The ironic outcome of ongoing theft and corruption plaguing the electricity sector has been enhanced by electricity generation by the private sector and new opportunities for private distribution. Instead of hinging upon ineffective and unreliable SEBs, industrial actors have chosen an exit strategy and started to generate their own captive power. This has been a further upshot of the open access clause in the 2003 Electricity Act that took away the authority of the SEBs to veto the transmission of electricity through their lines, allowing instead any surplus electricity generated by these captive power plants to be sold to the grid. As a result, multiple generators and distributors compete for customers in a bulk market. The detracted authority of SEBs has fostered a parallel economy, which has emerged alongside the state sector. This "dual-track economy" by which market-based electricity is introduced alongside the state-run sector allows politicians to promote market development without jeopardizing the support of a key political constituency.

Not always do partial reforms hinder the adoption of further reform. This is true chiefly in sectors where some groups have an exit option: Partial reform in the Indian electricity sector rather boosted further privatization and sparked competition in the market. The politically feasible Indian modus vivendi preserved the state sector in the electricity market (each state has been left to decide subsidy issues), allowing industrial consumers to exit and fend for themselves. An emergent market-based electricity sector has been a welcome collateral effect of that process.

Planning and Zoning

Planning and zoning are closely related to resource and energy management. For example, managing available water resources is extremely important in urban areas. In Chapters 2 and 3 we discussed how the landmass of the earth has become almost completely circumscribed by jurisdictions from the national down to the local level. In a situation where there is no longer common land, planning and zoning have become major government responsibilities.

Zimbabwe: Land Reform in a Ruptured Ex-Colony

Land reform has been brought back to the fore of the developmental agenda in the last two decades, owing to resurgent interest in land distribution as a means to alleviate poverty and better rural livelihood. Recent land occupations, extensive land reform, and agrarian change in Zimbabwe epitomize Africa's land question (information in this section from Chigumira, 2006; Chaumba and others, 2003; Chaumba, 2006; Wolmer and others, 2003). Upon becoming independent in 1980, Zimbabwe (formerly Rhodesia) inherited racially skewed land distribution. About 6,700 white-owned farms and a number of large agroindustrial estates occupied over a third of the country's land area, much of it areas of higher agricultural potential. Prior to independence, white settlers had occupied the more fertile land suitable for rain-fed agriculture, while the natives had to settle for less fertile and unproductive communal areas. That disparity had been an upshot of colonial legacy of massive land expropriation by the white settler minority.

Land reform was constrained by the constitutional provisions of the Lancaster House agreement signed in 1979. All prospective agrarian reform was designed to increase farming efficiency through careful planning. Soon after independence, the government turned a blind eye when masses of squatters occupied abandoned and vacant land, asserting their claims on ancestral land and rejecting the colonial state's technical prescriptions and proscriptions on access to and use of land. That transitional window of opportunity to dissolve colonial arrangements closed as soon as the Rhodesian-style top-down, interventionist, and technically driven approach to resettlement planning took hold again. Throughout the 1980s, political posturing around land issues and reform of traditional institutions alongside well-orchestrated bureaucratic and technocratic response, informed by modernist views of development, stymied resettlement.

The government of Zimbabwe embarked on the Fast Track Land Reform Program (FTLRP) in July 2000 to redistribute land to the "land hungry" after countrywide, large-scale "occupations." This program needs to be understood in broad political, economic, and institutional context. From the 1990s onwards, frequent droughts afflicted Zimbabwe, aggravating rural poverty. The political euphemism of the reform was "Land is the Economy and the Economy is Land." The program was based on compulsory acquisition of land for resettlement purposes from the white commercial farming sector, private companies, and absentee landlords, without paying compensation.

To increase agricultural production and reduce rural poverty, the FTLRP cast two models for resettlement, namely the A1 and A2 models. The A1 resettlement model has been a village type of resettlement where peasants have been allocated homestead areas, arable land, and grazing areas as distinct blocks of land in a particular area, and grazing has become communal. Roads, water sources, and natural resources have been common property to be shared by those in the scheme. That model has targeted landless people in order to decongest communal areas, and 20 percent of the land was reserved for war veterans.

The A2 model aimed to increase the number of black indigenous commercial farmers; it resembled a self-contained unit where an individual farmer has occupied a farm and was fully in charge of it. The farmer received no state funding. All citizens of Zimbabwe could apply to be resettled according to this model, provided they had entrepreneurial skills, some form of agricultural experience, and financial resources. Politically, the government was in dire straits after its draft constitution had been rejected at the February 2000 referendum. In the aftermath, the government amended the constitution in April 2000 to allow for compulsory acquisition without having to pay compensation.

For the first time since independence, the ruling party, Zimbabwe African National Union-Patriotic Front (ZANU-PF), faced a strong electoral challenge in the form of the Movement of Democratic Change (MDC) at the 2000 general elections that followed the referendum and the 2002 presidential elections. This prompted commentators, the media, and scholars to view FTLRP as a political campaign to preserve the status quo that did not have the rural poor in mind. Large-scale occupations of white-owned commercial farms across the country spearheaded by the War Veterans' Association with the tacit support of government were initially cast as political "demonstrations" against the government's and donors' failure to address the charged "land question" after 20 years of

independence, and anger at the rejection of the new constitution. Explanations of the farm occupations have tended to cast them as either spontaneous rejection of the bureaucratic process of land reform or a state-orchestrated process. There were nonetheless further motivations for farm occupations: top-down directives to bolster support for ZANU-PF in its rural heartlands, localized desires to restitution of ancestral land, and opportunist poaching, to name a few.

On invaded farms, invaders engaged in illicit activities that rapidly became normalized under the government aegis. They closed farm roads, cut down trees, stole and mutilated cattle, started fires, looted property and sugar cane, and even ordered farmers, farm workers, and neighboring villagers to attend political rallies while defying police orders and appropriating police vehicles.

The program has been condemned internationally, regionally, and locally for land occupations, lack of rule of law, disrespect for property rights, and inadequate planning and financial support. In response to the FTLRP, the United Nations Development Program (UNDP) sent two mission teams to assess the situation and propound a sustainable program. An alternative land reform program termed the Zimbabwe Joint Resettlement Scheme was also proposed by the Commercial Farmers Union and the private sector. The government accepted the UNDP initiative in September 2001, but only prima facie as it was unwilling to honor the agreement, and farm "occupations" continued undisturbed.

The FTLRP has taken its toll on Zimbabwe. Due to loss of production on many resettled farms, Zimbabwe has shifted from being a net exporter of food grains to a net importer. From 1995 onwards, Zimbabwe's GDP had already been in a downward spiral alongside additional key economic indicators. From 2000 to 2004, things went from bad to worse with plummeting foreign currency inflows that left the Zimbabwean industries unable to import raw materials for the production of agricultural inputs. The corollary was a shortage of agricultural input including fertilizers, agrochemicals, seeds, and equipment. Aside from political upheavals, the FTLRP caused an economy already in the hole to sink deeper.

New Zealand's Resource Management Act: A Spearhead of Sustainable Development

Sustainability had been looming large in the preceding two decades at United Nations conferences and learned symposia, but hitherto no modern nation espoused it unequivocally as an underlying principle of the people's

relationship with their natural environment (information in this section from Burton and Cocklin, 1996; Memon and Thomas, 2006; Berke and others, 2006; Perkins and Thorns, 2001; Kerr and others, 1998). New Zealand ventured into uncharted waters when it adopted the Resource Management Act (RMA) in 1991 in the midst of a 15-year period of neoliberal dominance in the form of a conservative National Party government traditionally backed by farmers and businesses. The RMA had been among the first planning legislation in the world to attempt the principles of sustainable development, and it substantially changed the basis of urban planning that prior to 1991 had derived from the provisions of the Town and Country Planning Act 1977 originally hailed from Britain.

For over two decades the RMA has been the principal legislation governing the use of New Zealand's land, air, water, ecosystems, soils, geology, and the built environment. It repealed 59 erstwhile statutes and was intended to provide a framework for simplifying environmental management. The *raison d'être* entailing new legislation had been overlapping responsibilities of different agencies, lengthy and complex consent procedures that curbed public involvement, and poor accountability.

Three unresolved policy dialogues have been directly implicated in the management of water in New Zealand, not unlike other former British colonies. The first one concerns intergovernmental relations both hierarchically (between national, regional, and local jurisdictional authorities) and laterally (between regions and between localities in the same region). The RMA has laid down a national environmental policy whose implementation has been largely devolved to regional and local governments. The second policy dialogue concerns the relationship between governments and markets. The RMA supplanted the customary use principles that had relied on traditional common law doctrines. It enabled experimentation with market-based methods of water resource allocation and reallocation, following close on the heels of a decade in which privatization had become commonplace in New Zealand after the government had ceded ownership of most of its resource base. The third policy dialogue had to do with appellate court decisions that brought to the fore unresolved issues between the New Zealand government and the Māori people regarding ultimate title to and authority over all natural resources, including water. The RMA has set forth devolved intergovernmental arrangements whereby the central government was supposed to establish national goals and policies to be carried out by subnational governments. District councils were required to adopt plans intended to promote sustainable management of natural and physical resources.

The RMA was an attempt to do away with zoning, assuming that the governing bodies closest to resources were the most appropriate to govern the use of those resources, and that it was more efficient to focus on adverse environmental effects of some activities rather than the activities per se. Central government had set policy while casting national environmental standards whereas local government agencies had latitude in choosing any policy mechanism they considered most befitting. Since the RMA had embraced the principles of environmental impact assessment, plans established an effects-based policy framework against which development proposals and permit applications would have been assessed. To maximize flexibility when applying for development permits, rather than prescribe activities, heed was paid to prospective effects by postulating predicted outcomes premising environmental "bottom lines" would have been met. This assumption, however, has not been without its flaws. The law had elaborated the meaning of "effect:" any positive or adverse effect; any temporary or permanent effect; any cumulative effect regardless of scale, intensity, duration, or frequency; and any potential effect, whether it was of high or low probability. The assessment of effects should have included visual and physical disturbance, socioeconomic and cultural effects, and information as regards alternatives and mitigation methods.

Furthermore, the term "sustainable development" is a contestable one and capable of various definitions and interpretations. The act has not clarified what sustainable development might mean, and thus far, there is no articulate policy vision from central government. Instead, communities should have decided for themselves what it meant in line with one of the fundamental tenets of sustainable development; that is, to make decisions as close to the issue as possible.

The RMA professed the need for local government to extend the degree of public involvement and participation in the planning process; its appendix has specifically directed regional and local authorities to consult with the leadership of local Māori groups that might have been affected by policies and corresponding plans. Absent national guidelines, regional and local governments have demonstrated diverse perspectives on the issue of how free they were to overrule Māori objections to resource consent applications.

Courts have been obfuscating matters further rather than resolving them. A court ruling, for instance, made clear that it was the obligation of the project proponent and not the governmental authority to identify germane Māori groups and initiate consultation with them concerning the consent application. Such a stipulation has lent itself to inadvertent if not sheer abuse

because, akin to other common law nation-states of the Pacific Rim, Māori groups tend to be less well off than the average population. Māori groups can rarely afford to participate at all in resource consent proceedings to bring their views forward, and when they do participate, they cannot hire the kind of technical expertise that development proponents have at their disposal to convince government decision makers.

Cooperative planning predicates committed subnational governments willing to comply with national planning legislation, but at the same time those governments may not have the capacity to do so. If the central government funds its central agencies insufficiently, subnational governments are unable to meet national mandates or implement national policies accordingly. Such deficiencies have been evident in some local authorities where relationships between Māori people and the (nonindigenous) local community have been strained.

Inasmuch as the RMA represents, prima facie, a radical change to land-use planning, practically not much has changed on the ground. Planning and resource use have always been the centerpiece of local politics—where outcomes are determined. The failure of central government to provide policy direction and advisory support as well as adequate funding for its agencies has brought to bear on implementation when it came to the stipulations laid down in the RMA. Regions and districts have therefore varied in terms of planning processes and outcomes contingent on patterns of local political culture, economic activity, population shifts, ethnic composition, and mobilization of local groups through both "not in my backyard" and other types of organizations.

Brazil: Frontiers, Landlords, Squatters, and a Vacillating Government

Early in the 1960s, the Brazilian government initiated a huge development program to integrate the Amazon region into the national economy (information in this section from Mertens and others, 2002; Alston and others, 2000; Alston and others, 1999a, 1999b; Cullen and others, 2005; Dias Martin, 2006; Pacheco, 2009) and to address political pressures for land reform. The Land Statute of 1964 proposed expropriation as a major part of the land reform it put forth. This *Estatuto da Terra* called for better distribution of land through appropriation and indemnification of unproductive properties and their distribution to rural workers. Until 1985, the basic instrument of land reform was colonization projects on government land, especially in the Amazon. The Landless Workers' Movement—*Movimento dos Trabalhadores Rurais Sem Terra* (MST)—spearheaded occupations as they hinged on

constitutional provisions that allowed for confiscation of private property in case it was not cultivated or when the owner was in violation of labor or environmental regulations.

Various Brazilian constitutions (and the most recent one of 1988) abrogated the rights of titleholders and gave squatters preferential privileges. Not only could squatters occupy and claim government land, but they were also allowed to occupy up to 50 hectares of vacant private land. Squatters could obtain title through adverse possession, if they occupied and developed their lots for five consecutive years without opposition from owners. In case owners protested that occupation and had the squatters evicted, squatters had the right to be compensated by landowners for any improvements they had made.

The National Institute for Colonization and Agrarian Reform (INCRA) was founded in 1971 to administer formal colonization projects on behalf of the federal government. A parallel state agency, ITERPA, was established by Pará (the eastern Amazon state, the second largest in Brazil) in 1975 to coordinate settlement and process title applications. INCRA furnished the constitution with provisions whereby tracts with more than their legally required 20 percent forest reserve were regarded as unproductive. Extensive uncultivated land on a property was presented before courts as cause for suspending claims of aspiring titleholders. Between 1970 and 1985, the population of Pará grew from 2.2 million to 4.3 million owing to migration to the Amazon frontier.

In 1985, the Brazilian government implemented the National Plan for Land Reform (PNRA) to redress extremely high levels of land ownership concentration. Unlike previous failed attempts, for the first time expropriation of private land was to be the main instrument by which to obtain land for settlers. Under the new policy, the government's land reform agency, INCRA, was to expropriate private land that was not being put to beneficial use. Once expropriated, the agency was to create a settlement project and enroll families of landless peasants it had previously registered in a cadaster. Families were expected to wait until their time came to be assigned land. In practice however, landless peasants realized that implementation was extremely slow and that individuals and groups could expedite the process to their advantage by invading land that met INCRA's criteria for expropriation. Invasions had often escalated into a conflict with landowners, which led INCRA to expropriate farms and settle the squatters on them as a means to solve the problem.

During the late 1980s, the process of invasion and expropriation evolved slowly and unsystematically with separate groups invading farms

throughout the country, sometimes successfully and sometimes not. Incongruity between civil law, which has provided for the sanctity of title and has been enforced by the courts and the police, and constitutional law enforced by the federal government that added a beneficial-use requirement as a condition for title enforcement, has engendered absurd sticking points. Responsibility for enforcing constitutional law and implementing land reform policies has lain with INCRA, whereas responsibility for civil rights has been vested in courts and enforced by the police. Squatters had repeatedly invaded an allegedly unused tract of private land and then lobbied INCRA to intervene on their behalf. INCRA checked whether the farmer had clear, legal title and whether the farm had been used productively (usually whether it had been cleared of forest). INCRA could expropriate land and hand it over to squatters whenever a farm was deemed unproductively used.

Burgeoning empirical evidence suggested that compliance with the beneficial-use requirement of the constitution intensified deforestation, since squatters were less likely to invade and resist eviction from farms that had been largely cleared of forest. Farmers had a penchant for deforestation in order to secure their property rights because INCRA was less apt to expropriate farms that had met the social-use criteria stipulated in the constitution. Ultimately, the PNRA set up rather ambitious goals such as that of settling up to 1.4 million families in five years. Yet after five years only 90,000 families had been settled and very little progress was achieved in terms of land regularization and titling. Brazil still holds the largest continuous tropical forest in the world, but it has also lost the greatest extent of forest compared with its tropical counterparts.

The Brazilian government could not get away with its modus operandi, which has caught the attention of environmentalists. Many nongovernmental organizations (NGOs) dealing with agrarian reform and conservation had been born, revived, and greatly strengthened by the time the Brazilian military government went down in 1984. Poor land stewardship on the part of farmers became a unifying theme for both the land reform movement and Brazil's environmental movement. Environmental aspects have been addressed through pilot projects under the National Environment Fund that promoted agricultural practices that diminish deforestation but foster livelihood. Some environmental groups have questioned whether rural poverty could be solved within the confines of settlements. In light of progressive degradation of land occupied for agrarian reform, Brazil's National Environment Council decreed in 2001 that areas under consideration for agrarian reform should be licensed

environmentally prior to settlement. Environmentalists and land reform groups have started to collaborate, adhering to a landscape-planning perspective that has taken into account multiple land use options. Organized land reform groups have taken on technical assistance to orient land use on settlements in a way that respects environmental objectives and have sought to establish means to legally challenge land titles irrespective of the percentage of uncultivated land.

Laos: The Desperate Ecocide of the Poor

The Lao People's Revolutionary Party (LPRP) was founded on March 22, 1955, four years after the Indochinese Communist Party had dissolved; its name was changed at the Second Party Congress in 1972. The economic reforms of the 1980s known as the New Economic Mechanism (NEM) signified a policy change that undertook to replace the socialist command-and- control economy with a market one. Alongside an "open door" policy toward both the domestic private sector and foreign direct investment (FDI) and supporting legal and regulatory framework for these measures, NEM sought to privatize most state-owned enterprises (information in this section from Ducourtieux and others, 2005; Ducourtieux and Castella, 2006; Stuart-Fox, 2005; Lestrelin, 2010; Lestrelin and others, 2011; Fujita and others, 2006; Rigg, 2006; Vandergeest, 2003). Laos suffers from high levels of poverty but enjoys remarkable ecological wealth. Since 80 percent of the population relies on agriculture for a living, land use planning comes to grips with challenges of sustainable development.

Embracing precepts of market economy in 1986, the government dismantled collectives and state farms, giving tax breaks instead as an incentive for private farmers to make productive use of their agricultural land. In 1994, the Focal Site Strategy established "integrated rural development clusters" in the most deprived areas of the country in order to create "growth zones" or "development poles" that became "centers of change and learning" facilitating transition from subsistence to market. Villagers were drawn down from the hills, sometimes involuntarily, and settled in areas where land was scarce and the best land was already claimed. The government provided for communal forest lands through legislation that defined official village boundaries and transferred their management to individuals. The government began to issue land title deeds to private landholders in the mid-1990s to ensure formal rights to land while promoting its productive use.

Being apprehensive of upland deforestation and shifting cultivation, the policy demarcated forest conservation areas throughout allocation of

agricultural land. The Laotian state catered for a protected area system of 18 National Forest Reserves covering 28,200 square kilometers that were expanded later to 20 areas accounting for some 30,000 square kilometers or 12.5 percent of the country. The Land and Forest Allocation policy was consolidated by the Forestry Law in 1996. It recognized communities' and individuals' rights to use and manage lands particularly in rural areas and distinguished village land into agricultural and forest land whether wooded or not. The land zoning system set forth by the law classified forested land in villages into five categories:

- "Protection forest" where human activities are prohibited to prevent soil erosion and related natural disasters, and protect water sources and national defense areas;
- "Conservation forest" where human activities are prohibited in order to preserve fauna, flora, biodiversity, and areas of cultural, educational or scientific interest;
- "Regeneration forest" reserved for natural reforestation of young fallow forests;
- "Production forest" where there is limited permission to log forest products;
- "Degraded forest" allocated for tree plantation, livestock farming, or permanent agriculture but allowing no shifting cultivation.

Forestless land has also been further subdivided into farming areas composed of field farms without rotation (such as rice fields, gardens, and other cash crops) and pastureland. The classification of the Land Use Planning and Land Allocation program (LUPLA) has become the main "area-based" instrument outlining rural development and natural resource management in Laos. Land tenure security enabled farmers to invest in their land and encouraged communities to protect the forest by managing the area in a sustainable manner and removing large portions of the village's land from the slash-and-burn cycle to turn them instead into controlled reserves. That reallocation was also supposed to boost government's revenues owing to property taxes.

The program has proven ineffective or even counterproductive to the political aims of poverty alleviation and environmental preservation; the traditional land tenure prior to reform may have been better capable of carrying out the political goals mentioned. LUPLA aggravated local land tenure disparities because early settlers and local elites exploited their social position and influence within the village to register large tracts of land to the

detriment of less established and powerful residents. Non-elites remained largely excluded from crucial stages of zoning and planning because land allocation tended to freeze existing disparities in access to land resources as a function of the bargaining power of each individual household.

Land allocation artificially accelerates rotations that lead to soil degradation in terms of increased weeding at the cost of other economic or social activities, reduced yields, greater agricultural risks, and worse poverty for slash-and-burn farmers. Forest industries have been allowed to make deals with local administrations to classify zones worth exploiting as production forest while farmers have been turned away in exchange for a symbolic compensation of 2 percent of the value of the wood cut. Reallocating land and forest has become the primary cause of displacement and impoverishment in Laos, inducing out-migration due to the loss of livelihood. The poorest farmers who had been evicted from the countryside in droves were barely absorbed by other economic sectors. Village boundaries were cast hastily, and not through mutual consent that could resolve conflicts over resources.

The neo-Malthusian model posits a "downward spiral" of poverty and environmental degradation: Population growth, limited access to land, and lack of resources to invest in conservation drive the rural poor to intensify their pressure on the environment. Degradation further limits natural resources and increases poverty. Although its scope and antecedents are a bone of contention, deforestation in Laos continues hand over fist. LULPA has been criticized for its negative impacts on rural livelihoods such as agricultural land pressure, decreased food security, worse poverty, cultural trauma, and uncontrolled migration. Limited local participation has been hardly conducive to sustainable land zoning, planning, and allocation. Land use planning failed to advance sustainable development and public participation as a means to settle individual differences with respect to social and environmental values.

Industry and Trade

Whatever their size, the states of sedentary societies have been involved in the economy from the beginning. The nature of that involvement was extractive since states levied taxes on produce, craft, industry, and trade. For most of history, states governed an agricultural economy, but in the past two centuries or so the emphasis shifted in Western countries to industrial production and—more recently—to the service sector and information exchange. In the process states and their governments no longer just extract

resources from society, but actually and actively shape the economy by means of regulation driven by specific political beliefs. Initially, these beliefs centered on strong state intervention embedded in the idea of social and bureaucratic engineering. In the past three to four decades the role and position of the state has been moving toward establishing conditions for the liberalization of industry, trade, and the economy in general. Especially with regard to industry and trade, we really live in a globalized world.

Morocco: Liberalization of Trade and Tariff Reforms

After it regained independence in 1956, Morocco's economic development strategy was based on import-substitution industrialization and agricultural self-sufficiency in a highly protected domestic market that imposed high tariffs and quantitative restrictions on imports (information in this section from Currie and Harrison, 1997; Dennis, 2006a, 2006b; Migdalovitz, 2010; Philippidis and Sanjuán, 2007; Cammett, 2007; Crombois, 2005; CIA Factbook, 2012; Löfgren and others, 1999). During the 1970s, the Moroccan government expanded growth through high levels of public spending financed by receipts from phosphate exports and foreign borrowing. The balance of payments crisis in 1978 brought in its wake a stabilization program supported by the International Monetary Fund.

Following a second crisis in 1983, authorities took emergency measures whereby all imports were subject to licensing. In consultation with the World Bank and with the support of a Trade and Industrial Policy Loan, the government introduced structural adjustment measures designed to eliminate the bias against export activities, liberalize the import regime, and enhance the allocative role of the financial sector. Quantitative restrictions, the principal instrument of protection for domestic goods, were dismantled piecemeal. Since existing quotas had been transformed to tariffs, tariff reductions went ahead quite sluggishly. From 1983 onward, changes to the industrial code were undertaken to promote exports, and the exchange rate was devalued. In the reform process, most goods were gradually transferred from List B (imports requiring prior authorization for import) to List A (imports requiring no prior authorization). List C of all prohibited import items was abrogated in 1986.

Trade reform substantially reduced coverage of import licenses (quotas) from 41 percent of all imports in 1984 to only 11 percent of all imports in 1990, but the major attainment of the tariff reform was to shrink dispersion in tariff protection within manufacturing sectors. Although average tariffs declined only slightly from 32.5 percent in 1984 to 28.6 percent in 1990, the maximum

tariff fell from 165 percent to 45 percent during that period. Average import penetration hardly increased at all due to domestic contraction and devaluation, but the extent to which different manufacturing sectors had been affected varied tremendously. In textiles, clothing, leather products, and beverages and tobacco, significant reductions in both tariff and quota coverage led to dramatic increases in import penetration. However, Morocco has demonstrated mixed progress in tariff liberalization. While average most-favored nation (MFN) rates had been liberalized from 65 percent in 1993 to 21.7 percent in 1997, later on tariff rates increased, remaining around 30 percent in recent years. Morocco has clearly faltered as regards trade liberalization in general and tariffs in particular.

Morocco has had the most restrictive MFN tariff regime in the Middle East and North Africa (MENA). MENA is one of the most trade-restrictive regions in the world; that places domestic Moroccan producers, including exporters, at a competitive disadvantage by denying access to cheap imports and inflating final prices of imported goods to consumers. Still, export-processing zones combined with a network of preferential trade agreements have cut actual tariffs faced by some producers.

After many years of inward-looking economic policies, Morocco has embraced trade-led growth through regional and preferential free trade agreements (PFTAs). Morocco is a member of the Arab Free Trade Area (AFTA) and has bilateral trade commitments with countries in MENA, but its principal trading relation lies with the European Union (EU) under the European Free Trade Association. Moroccan-EU trade relations are under the aegis of the Euro-Mediterranean Partnership, a series of bilateral association agreements between the EU and MENA countries. The Moroccan-EU Association Agreement has been in force since 2000 and promised free trade of industrial products by 2012, but most trade covered in this agreement had already inured by previous accords, while progress in services, agriculture, and investment has been partial at best.

Morocco also lags behind in terms of industrial upgrading. Industrial upgrading refers to different processes such as increasing the skill content of local production (people and factories alike), moving into market niches that are relatively insulated from competition on global markets, and expanding the range of activities in a given value chain carried out within a firm or a cluster of firms. The Multi-Fiber Arrangement (MFA) imposing quotas on the amount developing countries could export to developed countries had governed the world trade in textiles and garments; in 2005 it was rescinded and world markets were tightened. Competition from China makes exports of higher value-added manufactured goods, improved

efficiency, and reduced speed to market essential for countries such as Morocco that can no longer compete on the basis of low wages. The private sector in Morocco that has always cultivated close ties with the monarchy prodded the government into action in terms of upgrading processes, but it seems that the state rather than business associations should serve as the locomotive of such an all-encompassing process.

The ending of the MFA also entailed Morocco to diversify economically, one of the upshots of which has been the free trade agreement (FTA) between the United States and the Kingdom of Morocco signed in March 2004. Supporting the U.S.-led coalition in the wake of the Iraqi invasion of Kuwait and in light of its hardline policy on "global terror," the close ties with the United States that Morocco enjoyed as a moderate Arab state have strengthened during the last years. In 2004, President Bush designated Morocco a major non-NATO ally. Being a part of NATO's Mediterranean Dialogue, Morocco had hosted NATO military exercises and joined NATO's Operation Active Endeavor monitoring the Mediterranean Sea for terrorists. Morocco has become the second Arab country after Jordan and the first in North Africa to sign a PFTA with the United States.

Trade liberalization has had detrimental effects concerning the rural poor. Large portions of Morocco's gross domestic product (18.8 percent) and its labor force (44.6 percent) still depend on agriculture and are vulnerable to rainfall fluctuations; only 19.8 percent of the labor force works in the industrial sector. Agro-food liberalization brings potential trade and growth gains to Morocco. Nonetheless, additional "gains" to Moroccan agro-food markets from the enlargement of the EU and the inclusion of multilateral tariff reductions are offset by losses: While Morocco's specialization in "typical" Mediterranean vegetable, fruit, and nut products reaps gains, the crop sector that sustains many of the rural poor contracts. Trade liberalization disfavors the rural poor, especially in rain-fed areas; governments should thus undertake proactive measures to upgrade the rural labor force in terms of their skills and resources. Furthermore, Morocco has a rigid labor market that makes it extremely hard to lay off permanent workers and hire a temporary, low-skilled workforce. Those barriers to entry experienced by firms on top of red tape and corruption impede Morocco's structural adjustment.

The Czech Republic: Cars, Motors, and Foreign Direct Investment (FDI)

Privatizing state-owned enterprises (SOEs) was considered one of the most important issues at hand when post-communist economic systems needed

to be transformed into market-based systems. When it came to East-Central Europe, privatizing most economic activities (i.e. industry, agriculture, services) while developing a solid private sector was the centerpiece of all economic transition plans (information in this section from Pavlinek, 2002a, 2002b; Estrin and others, 2000; Armstrong, 2002; Arnold and others, 2007; Rugraff, 2010). The Czech Republic was not an exception; within a few years after the end of the communist regime in 1989, the government of the former Czechoslovakia privatized many SOEs, liberalized prices and wage setting, and opened the country to foreign trade and foreign direct investment (FDI).

The Czech Republic had been part of the Western, industrialized, Austrian-ruled part of the Austro-Hungarian Empire; after its separation from the Slovak Republic in 1993 the new Czech Republic was seen as one of the more promising economies in Central Europe. The Czech Republic has been one of the most successful Central and Eastern European countries in terms of the stock of FDI per capita. Many of the world's most prominent multinational companies have established themselves in the Czech market, as the Czech Republic has astutely availed itself of its pivotal location at the heart of Europe.

The Czech motor vehicle industry has been the icing on the FDI cake. During the Communist period, Czechoslovakia developed a carmaking tradition with the companies Skoda, Tatra, and BAZ, but the quality of motor vehicles and components was low compared with Western standards. Motor vehicle companies reflected political priorities and did not correspond to the criteria of economic efficiency to be found in mature market economies. Moreover, when the Czech Republic disintegrated from its former political and economic allies, it paid a price of losing important commercial and industrial ties. On the other hand, breaking those links has been conducive to stabilizing the country's economy and reorienting its trade.

FDI was part and parcel of the endeavor to compensate and supplant those lost ties, but not from the very outset. Initially, the privatization project purported to transfer ownership to the population either directly through stock ownership or indirectly through investment funds in order to set up so-called people's capitalism. Owing to the cheap value of national assets, the problem of the former German minority, and nationalist attitudes on the eve of the splitting of the federation, key political leaders disapproved of the entry of foreign capital into Czech companies and refused to endorse even joint ventures. In 1992 the government had decided not to provide any tax incentives for foreign investors despite perceived lack of domestic capital, but after the elections a new one was set up. The new government had

encouraged as many large companies as possible to participate in its voucher privatization scheme, but absent legal and institutional framework to support such transfer of ownership, that "Czech way" of privatizing failed to bring about structural adjustments and rather confounded economic difficulties in the second part of the 1990s. During the second stage (1992–1997), foreign investors were not offered any incentives to invest and domestic investors were preferred for the most part. The concluding phase after 1997 has been underlain by strong governmental incentives and support for FDI such as corporate tax relief, zero customs duty on imported equipment, special job creation grants, job training grants, and low-cost development land.

Foreign-owned firms and joint ventures introduced new management practices, work organization, and quality control. Measures were taken to cut costs and increase labor productivity by minimizing unnecessary waste and making better use of the workday. The previous socialist work organization and shop floor practices gave way to capitalist ones. Planned organization of production superseded the anarchy of production associated with state socialism. Much of the authority enjoyed by workers under the socialist system was curtailed. More efficient horizontal and vertical organization of the workplace enhanced the authority of the foremen and prompted managerial control. Western production concepts and management practices such as just-in-time were also instilled. Not only has productivity increased but also other parameters pertaining to production have been improved; personal accident rates, for instance, dropped off overwhelmingly.

In no other setting have those proceedings had more bearing than in the automotive industry where they have saliently taken hold. A motor vehicle is a sophisticated product that is made up of thousands of parts and components: A small car is made up of 15,000 parts, and a luxury car necessitates between 25,000 and 30,000 parts. The motor vehicle manufacturers do not possess the know-how to internalize all operations, so they generate de facto vertical spillovers by buying products from suppliers. When manufacturers invested in the Czech market (through either ownership or joint ventures), they did so chiefly in local component suppliers in order to internalize their production and chain of supply, so those component companies have been upgraded. Unlike low-technology and labor-intensive industries such as footwear, clothing, or furniture, in the motor vehicle industry the quality of the final product depends not only on the quality of the different parts and components, but also on the motor vehicle manufacturers' capacity to coordinate their production process with that of their suppliers. Motor vehicle manufacturers are therefore stimulated to exchange information, management practices, and know-how with their

suppliers. Apart from management methods and technology transfers, multinational foreign partners have provided Czech component suppliers with access to their worldwide sales and distribution networks.

Volkswagen has been the quintessential propitious partner: In the original partnership deal with the Czech government, Volkswagen committed to source out from Czech suppliers and to develop the component industry further. Volkswagen encouraged local production of less sophisticated and less expensive components while taking advantage of their bargaining power vis-à-vis small and medium-size companies. The local sourcing ratio in the Czech Republic has been among the highest in developing and transition economies.

Preparing for the country's accession to the EU in May 2004, the Czech Republic liberalized services to become more receptive to foreign entries. FDI inflows into the services sector are associated with improved availability, range, and quality of services, which in turn contribute to improved performance of manufacturing firms using those services as inputs. FDI has jump-started the Czech manufacturing industry not only directly but also by ameliorating its ancillary service industry.

Canada: Trade Agreements with the Northern Empire

A country's trade and the relative size of its exports and imports rest on many variables such as exchange rates and overall economic growth in its trading partners, to name but a few (information in this section from Schwanen, 1997; Trefler, 2004; Gaston and Trefler, 1997; Clausing, 2001). Often market reforms come about in the wake of major macroeconomic disturbances, so it is hard to single out the impacts of macroeconomic shocks, market reforms, and trade liberalization, and even more so in developing countries where trade liberalization is typically part of a larger package of market reforms. Since it is easier to assess trade liberalization policies in industrialized countries where free trade experiments are more common, the Canada-U.S. Free Trade Agreement (CUSFTA) might prove to be apposite.

The Canadian federal government has implemented three major trade agreements since 1989: CUSFTA, the North American Free Trade Agreement (NAFTA, 1994), and the liberalizing measures flowing from the Uruguay round of multilateral trade negotiations that created the World Trade Organization (WTO, 1995). For Canadians, NAFTA was not so much a new agreement but rather extended a prior one that had been in place since January 1, 1989, and was merely supplemented later on with Canada-Mexico trade flows.

During the 1988–1995 period Canada's export performance was a bright spot in an otherwise floundering economy. It was hard therefore to distinguish those jobs that had been lost to the FTA tariff cuts from those lost to other factors such as the recession, the Bank of Canada fight against inflation that had led to high interest rates and a strong Canadian dollar, deindustrialization, and deteriorating labor costs and productivity in Canada relative to the United States. Alongside growth in export, import had also been on the rise over that period, in contrast to the experience of the Great Depression of the early 1930s and the more recent recessions of 1970, 1975, and 1982, when the share of Canada's demand satisfied by foreign goods had dropped. Canada had witnessed an upward trend in trade as a share of GDP since the mid-1960s, but it accelerated following CUSFTA and NAFTA.

The FTAs have been under attack from the very outset regardless of substantial evidence of increased trade due to the agreements, particularly for those goods undergoing the largest tariff liberalizations. The call to renegotiate or even abandon the agreement rallied support especially after the 1993 electoral defeat of the Conservative party that had engineered the agreement.

Numerous empirical studies were undertaken to weigh the effects on trading patterns, productivity, employment, FDI, and so on; findings have often been discrepant. Taking into account the effects of both CUSFTA and NAFTA between 1989 and 1995, Schwanen (1997) found changes in Canadian trade patterns. Trade with the United States had mounted much faster in liberalized sectors in comparison with nonliberalized ones. Gaston and Trefler (1997) found to the contrary that both export and import had contracted for most of the FTAs period, whereas employment had contracted in every tradables-sector industry.

Researchers pointed the finger at the recession on both sides of the border rather than at the FTAs. Five years into effect, Canada lost a staggering 390,600 jobs in the tradables sector. Correspondingly, between 1988 and 1993 high- and low-tariff industries experienced employment cuts of 24.2 percent and 14.8 percent respectively. Despite the fact that heavily unionized industries experienced shallower tariff cuts, they still lost a disproportionate number of jobs, 19.8 percent compared with 15.2 percent for less-unionized industries. This explains why the Canadian Labor Congress has been the most vociferous opponent of FTAs.

In perfectly competitive markets, lower protection stimulates imports and decreases demand for domestic labor, which in turn reduces earnings and employment. In imperfect markets, on the other hand, trade and

protection can affect strategic interactions between firms, bearing on firm performance and subsequently on earnings and employment. It has been suggested that FTAs tariff cuts account for no more than 15 percent of job losses, but the measures against inflation taken by the Bank of Canada (coinciding with the 1986–1988 FTA negotiations) may account for more than 85 percent of jobs lost. The Bank of Canada had raised the spread between Canadian and U.S. interest rates and strengthened the Canadian dollar, measures that were denounced by Canadian businesses for engendering recession. North American structural change has had a pervasive effect owing to the strong relationship between Canadian earnings and employment and U.S. industry employment levels.

Canada's exports to Mexico rose by 39 percent (in Canadian dollar terms) during the 1993–1995 period, nearly the same growth as in the two years preceding NAFTA. Increase was slightly faster than that of Canada's exports to the United States over the same period, but exports to non-NAFTA countries rose even more rapidly. Granted that U.S. exports to Mexico rose only by 11 percent in U.S. dollar terms between 1993 and 1995 and Mexico's imports from all sources dropped precipitously in 1995, Canada's performance in the Mexican market was impressive. In May 1995 Mexico raised tariffs on a large number of goods imported from non-NAFTA countries to 35 percent, an increase that Canada and the United States have been spared. Canada's imports from Mexico rose by 44 percent between 1993 and 1995, considerably more than imports from U.S. or other sources (33 percent each). Already before NAFTA, most Mexican products faced low barriers in Canada.

According to theories of intra-industry trade, adjustment patterns to trade liberalization hinge upon determinants such as economies of scale and differentiated products (Feinberg and Keane, 2001). It has been found that firm characteristics account for adjustments and production-location choices of multinational companies rather than the attributes of the industry. Canadian tariffs had a small impact on U.S. multinational company sales into Canada, as opposed to the conventional wisdom expressed by free-trade opponents averring that free trade with the United States would "hollow out" Canadian industry. Such findings implied that government action designed to protect vulnerable sectors from trade liberalization might have been altering patterns of domestic competition rather than helping entire industries (Feinberg and Keane, 2001). Clausing (2001) suggested that there had been very little evidence of trade diversion from non-member countries; Gould (1998) similarly noticed that trade with countries outside North America had also grown following NAFTA. In light of their findings that

FTA gains had not been at the expense of other countries, both researchers advocated forging ahead with free trade worldwide.

Mexico: The Poor Cousin of NAFTA's Triad

From the mid-1980s until 2002, the value of the world trade more than quadrupled and foreign investment increased by a factor of 15. The WTO came into being in the 1990s during the heyday of global, regional, and bilateral agreements such as NAFTA (North America Free Trade Agreement) (information in this section from Gallagher, 2004; Esquivel and Rodríguez-López, 2003; Hanson, 2003; Moreno-Brid and others, 2005; Ramirez, 2003; Lederman and Maloney, 2003).

Between 1940 and 1985, Mexico had protected its industrial sectors through a set of tariff and nontariff barriers in order to create new industries and foster those already existing, virtually operating as a closed economy. In 1985, against a backdrop of falling oil prices and a debt crisis, Mexico started to liberalize its trade by joining the General Agreement on Tariffs and Trade (GATT) that both cut tariffs and eliminated many nontariff barriers.

In 1989 Mexico made it easier for foreigners to own assets in the country and began integrating itself with the world economy, becoming one of the more open economies in the world by the end of the previous millennium. The United States, Canada, and Mexico signed NAFTA in December of 1992, and it came into effect on January 1, 1994. This agreement was the first asymmetric free trade agreement in terms of the income levels of the participating countries. NAFTA culminated a radical change in the country's development strategy, serving not only as a trade-boosting venue but also representing a shift toward the so-called Washington Consensus (in Williamson's meaning; see previous chapter) which apart from trade liberalization had prescribed scaling down state intervention in the economy.

The aim of that policy shift had been twofold: First, it was assumed that together with drastic macroeconomic reforms and rapid, unilateral trade liberalization NAFTA would encourage local and foreign investment in the production of tradable goods so as to exploit Mexico's potential as an export platform to the United States. Such ventures were supposed to set the Mexican economy on a noninflationary, export-led growth path driven by sales of manufactured goods mainly to the United States. Secondly, the government of President Salinas (1988–1994) had a politically decisive objective to impose via NAFTA international, legal, and extralegal

constraints that would deter any attempt by subsequent governments in Mexico to return to trade protectionism.

NAFTA was implemented in its entirety only in 2009, but from the very outset the agreement had already been associated with significant, long-lasting effects on economic growth, trade and investment flows, employment patterns, wages and salaries, environmental standards, and labor law throughout North America and particularly in Mexico. Evaluating the economic and social impact of NAFTA on the Mexican economy has been difficult in view of its phased implementation and the need to disentangle the effects of NAFTA from those of non-NAFTA factors. That enmeshment of factors resonated in the dispute around the 1994–1995 peso crisis. Critics of NAFTA argued that it had ballooned the Mexican trade (and current account) deficit in the early to mid-1990s, while others cast aside those allegations. Either way, apart from political and social upheaval, the peso crisis led to a drop in real GDP of 6.2 percent in 1995 (almost 8 percent in per capita terms)—the worst plunge in economic activity since 1932.

The *maquiladoras* were a key element of Mexico's industrial strategy. Those labor-intensive, in-bond export-processing plants that had been mushrooming since 1966 along the northern border were offering tax-free access to imported inputs and machinery as well as exemption from sales tax (now VAT) and income taxes. The sales of these *maquiladoras* on the domestic market had been limited to a low percentage of total sales in order to prevent them from overflowing the local market. In 1988 exports had been equivalent to 49.7 percent of the total value added by the manufacturing industry; in 1994 this figure climbed to 71.9 percent, and by 2003 it had even exceeded by 61 percent the manufacturing industry's value added. It has nevertheless been impossible to ascribe such telling numbers to NAFTA alone. Mexico's domestic market had collapsed in 1995 ("the tequila crisis") while the peso depreciated vis-à-vis the U.S. dollar. Although depreciation had tapered off by 2004, the real exchange rate was still 7 percent lower in relation to the level 10 years earlier.

From 1985 to 1994, Mexico had ranked fifth among countries with the largest increases in their share of manufactured exports; during the period 1994–2001, it moved to second place, just behind China. The *maquiladoras* were a key force behind this export drive. In the early 1990s they provided more than half of Mexico's total exports of manufactured goods, and more than 40 percent of Mexico's total exports. Other important actors behind the boom were those foreign firms that had already been well established in Mexico alongside enterprises that arrived as part of the vast inflow of FDI triggered by trade liberalization, NAFTA, and privatization. The

manufacturing industry absorbed 53 percent of all FDI inflows to Mexico during 1994–2004 with investment concentrated in three subsectors: metal products; chemical products; and food, beverages, and tobacco (48 percent, 16 percent and 18 percent, respectively).

Wage inequality in Mexico increased sharply from 1980 to the mid-1990s, and then it did not change for a long time. This prima facie zero effect since the mid-1990s has been the result of two countervailing forces: Technology was responsible for the sharp increase in wage inequality in Mexico in the pre-NAFTA period. Absent technological change, trade liberalization would have reduced the wage gap in an unskilled-labor-abundant country such as Mexico.

Prior to NAFTA, the effects of technological change on the wage gap had outweighed those of trade liberalization, increasing wage inequality. In the post-NAFTA period, the effect of trade liberalization on the wage gap was almost zero, but technological change again pressed for an increase in the wage gap. Not unlike other developing countries, technological change has pressed for an increase in returns to skills, while trade liberalization has benefited low-skilled workers. These two effects work in opposite directions, so wage inequality depends on the relative magnitude of both effects.

Many researchers have pointed to the fact that trade liberalization and NAFTA have been helpful in terms of technological transfer and techno-logical progress, but it was not even nearly enough to bring Mexico on par with its North American counterparts. Mexico still suffers from low levels of innovation effort; its private sector, universities, and public policies interact inefficiently and cannot beget economically meaningful innovation.

With respect to the U.S.-Mexico border, Fernández-Kelly and Massey (2007) have argued that NAFTA represented the latest attempt to tear down barriers to capital mobility while circumscribing workers. During the 1970s, North American banks had been awash in petrodollars, which they were more than happy to lend to Latin American governments. Being in a pickle, many countries had been unable to repay these loans, so U.S. banks and federal officials used NAFTA to transform risk into opportunity for capital investment. European markets have been consolidated through multi-lateral policies designed to harmonize social policies, equalize economic infrastructures, and guarantee workers' rights and mobility within the trade zone. Such provisions have been missing in NAFTA since its U.S. backers have insisted instead on restrictive border policies and a unilateral right to prevent Mexican workers from migrating. NAFTA enabled financial insti-tutions and manufacturers to invest and make profits in Mexico, so it had more to do with controlled trade rather than free trade.

Privatizing Mexico's collective farms under neoliberalism and eliminating agricultural subsidies under NAFTA also increased the number of displaced peasants seeking economic opportunities elsewhere. Those processes culminated in a tide of migrants who continued to arrive at the border and cross into the United States. When security measures became harsher (especially after 9/11), they did not return to Mexico in the same numbers as before. After 1986, unauthorized migrants reduced cyclical movements to spare themselves the greater costs and risks of reentry and settled in the United States instead. As the inflow of undocumented migrants has continued unabated, many are too apprehensive to return to their home country in fear of detention upon reentry to the United States, so the number of illegal and semilegal Mexican immigrants abiding in the United States has soared rather than stagnated. Such illicit migrants and their children have been increasingly at risk of forming a new Latino underclass of people with few rights and avenues for successful integration into the larger American society.

Borders force workers to remain fixed in space, hemming in the most vulnerable sectors of society while becoming permeable for those in positions of power. When it comes to Mexico, NAFTA and the macro-economic reforms accompanying it have been neither the panacea claimed by its supporters nor the disaster predicted by some of its opponents.

Comparing Energy Management, Planning and Zoning, and Industry and Trade across Nations

In this chapter, several socioeconomic reforms taking place in different parts of the world have been vetted. Reforms that concern energy management, spatial planning, trade, and industry permeate every citizen's life in one way or another. Traveling across borders and cultures, reforms, processes, and outcomes seem to diverge since culture forges institutions; those, in turn, underlie processes, behaviors, and reforms, point the direction, and project future developments. Variance notwithstanding, few thrusts can be traced from which some common ground and conventional wisdom may be carved out at least tentatively.

The "Washington Consensus" has been a shorthand for the shared views of international organizations such as the International Monetary Fund, the World Bank, U.S. Treasury, and the OECD portrayed as the best means to reach a long-term economic growth desideratum; privatization and deregulation have been among its rudiments. When it comes to the

energy sector, such directives may not hold water. Electricity generation has some technological traits that do not favor decentralization and deregulation. Electricity needs to be consumed once it is produced, so shortages cannot be alleviated through storage. Moreover, the interconnect-edness of the electricity grid means that shortages on any part of the grid could threaten the stability of the entire system, of which the California case has served as a case in point. When the electricity system of California was decentralized and deregulated from the mid-1990s, many new generators took on opportunistic behaviors. Since any generator controlling any amount of generation capacity necessary to meet the demand at a given moment can threaten to black out the entire grid by withholding power from the market, he can demand an infinite price for the last (necessary) units of electricity because all consumers' demand will go unmet if that price is not met. The California grid has not been successfully dovetailed. In the aftermath of this legislative and institutional experiment, California citizens picked up the tab, so they now pay much more money in real terms for less reliable and less responsive electricity supply (Duane, 2002).

India has been in many respects an antipode of California. It started to restructure its electricity sector in the late 1990s via devolution and delega-tion from federal to state level. From 2003 onwards, a process of unbundling generation, transmission, and distribution functions has been carried out. Due to political and institutional sensibilities, the private sector has not been allowed to impinge upon entrenched vested interests of the public sector. Market-based electricity has emerged piecemeal alongside the state-run sector. By fostering this parallel economy, the Indian government has not stifled private initiative altogether, but has rather left some room for innovation and thrift vis-à-vis its obsolescent, inefficient, and corrupt state-run sector. Russia represents a case of privatization gone sour. Corrupt polity, hostile business environment, and unfriendly bureaucracy have not left much chance to restructure either the whole energy sector or the firms involved. Germany has managed from the late 1980s on to encourage and integrate into its grid renewable energy sources (RES-E). Incentives have been given to investors, federal and state levels have communicated and collaborated with local communities, public information has been issued, and even training programs for architects have been reformed. The German case exemplifies that it is still possible in the presence of vested interests, such as those of certain industries and conventional electricity generators, to successfully inaugurate a substantial reform, provided that politicians, bureaucrats, businessmen, and the public at large are highly committed and willing to cooperate.

In Zimbabwe, Brazil, and Laos land reforms have been issued to achieve roughly the same goals of redistribution and poverty alleviation among the "landless," but new settlers have lacked savvy, know-how, resources, and technology to make the most of their land. Having to make do with what they have, they are caught in a vicious cycle of ecocide in which they are overexploiting their land either by cultivating it until its fertility diminishes or they are lured by opportunists to deforest their land and sell the woods for pennies, a small fraction of their market value. As time goes by, the land and its occupants become poorer and poorer. Massive land degradation has been evident in Laos during the last two decades, but deforestation has been even more alarming, especially for environmentalists from all around the globe. Many NGOs have been active in Brazil and Laos not only for the sake of the rain forests per se, but also because of "hot spots"—delimited areas populated by very high density of biodiversity including endangered species. In Brazil, there has been some progress, as settlers, environmentalists, and government started to join forces to diversify land use and protect the remaining forest by reducing institutional incentives to cut it down. New institutional mechanisms aiming at spatial planning while preserving the environment have been forged. In Laos, NGOs and environmentalists succeeded very little. The power structure in Laos has not changed much since the seventeenth century. Even during French colonialism (1893–1945), new institutions supplemented existing ones rather than supplanted them. When land was reallocated traditional elites looted large tracts of land for themselves, ripping off non-elites and excluding them from crucial stages of zoning and planning. The land reform purported to protect the forests and alleviate poverty, but absent other economic sectors to absorb the poorest farmers evicted from the countryside, it had opposite outcomes such as soil degradation, displacement, and impoverishment.

Land reform in Zimbabwe was comparable to that of Laos in terms of its outcomes of further impoverishment and land degradation. An epitome of a postcolonial mess, that reform encapsulated top-down dictates, grassroots pressure, political and social uprising, and a government that turned a blind eye to illicit action in order to contain clamor and frustration. The international community and Zimbabwe's private sectors ventured to intervene and offer some guidance and assistance, but Zimbabwe's government refused to defer, and the economy, already in dire straits, continued to wane. The Resource Management Act (RMA) enacted in 1991 in New Zealand has represented a disparate planning and zoning reform in a very different terrain, but not in terms of disappointing outcomes. Although New Zealand is a developed country and not a developing one,

very little has changed on the ground. The case of New Zealand's state-of-the-art law for sustainable development illustrates how a law can become a dead letter when central government fails to impose clear guidelines and adequate advisory support for implementation and to fund its subsidiary and local agencies. Mechanisms for consultation and deliberation with local and indigenous people have been wanting; courts have obfuscated matters even further as they have been vacillating rather than offering clear directives or guidelines. Rather than a wholehearted endeavor, the RMA remained nothing but lip service paid by the government of New Zealand to its constituencies, mainly to the country's indigenous people—the Māoris.

The theme of an open, competitive economy alongside free trade resonates in all the reforms presented in the last section. For many years, Morocco, the Czech Republic, and Mexico had been closed economies based on import-substituting industrialization before succumbing to circumstances. In Mexico and Morocco, a deficit and a balance of payments tipped the scales, while the Czech Republic had to restructure its economy and move from communist command and control to a market-based economic system. Once more, cultural and historic differences unfolded as processes and outcomes took very different forms and routes.

The Czech economy had taken off after a lame start and privatization fiasco and within a few years became a success story. Its past as part of the western, industrialized, Austrian-ruled part of the Austro-Hungarian Empire as well as its long history of vehicle manufacturing were definitely in its favor. Morocco and Mexico have made some economic advances but are still lagging behind for very much the same reasons. Mexico has managed to attract foreign direct investment inflows and expand its trade, particularly its export. In spite of technological transfer from its North American counterparts owing to NAFTA, Mexico has suffered from low levels of innovation efforts due to inadequate private sector, universities, and public policies. In these respects, Mexico has been a far cry from its NAFTA partners. Morocco has a unique preferential free trade agreement with the United States and also trades with the European Union and Arab countries. Still, poor human capital, a centralized economy characterized by favoritism of 500 powerful families by the royal court, and an undemocratic polity hinder further economic development. Contrarily, Canada has been a democratic, prosperous, federal state that has adapted itself to the new contingency quite easily, although it underwent extensive recession similar to that experienced by its southern neighbor, the United States, and by almost the rest of the world. Canada has managed to pull through recession and NAFTA; despite vociferous aversion especially from

unionized workers, the Canadian industry was not "hollowed out" and continued to thrive.

Every reform has its winners and losers. In Canada, low-skilled displaced workers find it harder to attain new jobs as low-tech industries migrate to developing countries; this process is facilitated by footloose capital. This is an adverse byproduct of structural reforms that engender structural unemployment (as opposed to frictional unemployment), because certain types of jobs disappear altogether from the market.

Yet those unemployed in a developed country fare much better than their counterparts in developing countries where there is no governmental safety net whatsoever. In Morocco, the rural poor have been the most evident victims of the reform, but the government is reluctant to accommodate the disfavored workers by upgrading their resources and skills. By the same token, poor Mexicans' fate has taken a turn for the worse. Poor agrarian workers displaced by the sweeping wave of neoliberal reforms find it harder and harder to look for opportunities across the north border—U.S. border policies are more restrictive than ever. When they do venture to cross the border they no longer circulate back and forth, but rather stay in the United States undocumented, illegal, and afraid of being caught. Those unregistered and deprived-of-rights immigrants are increasingly at risk of forming a new Latino underclass in the United States. Land, industry, and trade reforms impair the most vulnerable sectors of society; this common trait resonates in all the reforms mentioned previously. Even in the rich state of California, it is not difficult to imagine how indigent families strive to pay soaring electricity bills since no one can spare electricity altogether. In democratic, developed countries the highly skilled and educated, those who possess high human capital, hold sway. In developing countries, rulers, elites, and their affiliates are the lucky ones.

The whole world has been swept by the neoliberal zeitgeist of our time. NPM and the Washington Consensus are the magic words; open economies, privatization, deregulation, and free trade are the prescribed trajectories. No part of the world has been immune, no one has been spared from reform; it permeates piecemeal but persistently to country after country and to sector after sector.

WELFARE SERVICES AND POLICIES

Health Care, Education, and Social Services

It was in the late Roman Empire that health care started as a service to local populations living near a military compound. After the fall of the Roman Empire, this service was taken over by the Roman church. In Catholic countries this continued to be so until the twentieth century, while in Protestant countries health care transferred to the local authorities from the sixteenth century on. Urbanization and industrialization brought about living circumstances that encouraged epidemics (malaria, typhoid fever, diphtheria, and so forth). From the middle of the nineteenth century, doctors and nurses advocated government policies for public health care. What models of health care exist today in the world?

Next to basic health care, education is a major instrument to assure that each citizen has the ability to practice full citizenship in the public realm and to pursue a worthwhile career. This too was, at least in the Western world, a church affair (until the sixteenth century in Protestant countries and until the nineteenth century in Catholic countries). Currently, there are interesting differences between countries. For instance, in the United States, a nation with an allegedly weak state tradition, 90 percent of education is provided through the public school system, while in a strong state such as the Netherlands, about half the schools are private (and mostly denominational). What variation is there in education policy and systems across the globe?

In this chapter we will also focus on policies for the physically disabled and the mentally ill, the indigent, the sick, the elderly, the unemployed, and so on. Modern social services started around the mid-eighteenth century when, under the auspices of Poor Laws, leisured women, denied of self-expression in education, employment, and politics, manifested their talents in charitable work. Freed from household responsibilities by their maids and servants, they were keen fund-raisers and visited the poor in their homes, in workhouses and hospitals, and in asylums and prisons. This maternal welfare state, as Skocpol called it, was replaced everywhere by a paternal welfare state that focused its support on the breadwinner. What variation is there across the globe in social service policies?

Health Care

The modern state in its fullest expression provides a range of services for which there is no historical precedent, and perhaps health care in the broadest sense of the word represents that modern state best. To what extent do and ought states feel responsible for providing health care? Hubert H. Humphrey, speaking on November 4, 1977, at the dedication of a building named after him in Washington, D.C., said it thus:

> The moral test of government is how it treats those who are in the dawn of life, the children; those who are in the twilight of life, the aged; and those who are in the shadows of life, the sick, the needy and the handicapped.

We could not agree more, and yet there is great variation across the globe, and there is even variation among Western countries. Especially the health care system of the United States is sharply contrasted to that of other countries: "In a society that has long emphasized self-reliance, it is not surprising that the United States leaves its citizens more exposed than their counterparts abroad to the principal hazards of life, such as sickness, poverty in old age, violence, unemployment, and injury on the job." (Bok, 1996, p. 374) The American distrust of government comes at a price: "The real victims are the millions of poor or shelterless or medically indigent who have been told, over the years, that they must lack care or life support in the name of their very own freedom. Better for them to starve than be enslaved by 'big government.' That is the real cost of our anti-government values." (Wills, 1999, p. 21) In this section

we will look at the health care systems of Singapore, the Netherlands, Argentina, and Australia.

Singapore: The "3Ms" triad—Medisave, Medishield, and Medifund

Being a tiny island with no natural resources, Singapore has faced a most uncertain future from its inception in 1819 as a British colonial outpost throughout independence (1965). Such circumstances have forged a strong government-people partnership, which innately disposes people to place the common good above self-interest. Singapore did inherit a largely tax-based and publicly provided health care system (information in this section from Lim, 2004a, 2004b, 2005; Bar, 2001; Pauly, 2001).

When Singapore moved into first-world status, its government replaced government regulation with archetypal middle-class mechanisms of financial constraint and self-regulation that were supposed to be more sustainable in the long run. Although hospital care was free and government clinics were subsidized directly by the government under the previous system, there was no immediate funding problem with the old system; quite the opposite: Health costs fell dramatically as a proportion of gross domestic product (GDP) between 1960 and the introduction of Medisave in 1984. Medisave, the compulsory savings plan, was not an attempt to ameliorate the effects of a laissez-faire health system, but rather a bold venture to inject market forces into government-funded health care.

The inception of the "3Ms" was premised upon self-responsibility alongside the economic principle that health care services should not be supplied freely on demand without reference to price. These 3Ms were an explicit breakaway of Singapore from a British-style national health service, which was perceived as neither viable nor sustainable. Singapore's "no free lunch" philosophy has underpinned its rapid economic growth, so Singapore's government has eschewed egalitarian welfarism in favor of market mechanisms to allocate finite resources.

The Central Provident Fund (CPF) is a national superannuation scheme, which is a compulsory, tax-exempt, and interest-yielding savings account started in 1955 to provide financial protection for workers in their old age. Over the years, the plan has been modified to allow for preretirement withdrawals to purchase homes, buy home mortgage insurance, and even invest in "blue chip" stocks and pay for children's college expenses. Singaporeans contribute approximately 36 percent of their gross salaries to the CPF, half of which comes from their employers. Medisave was created in 1984 as an extension of the larger CPF. Medisave represents

6 to 8 percent of wages (depending on age) sequestered from the individual's CPF account to cover medical expenses such as hospitalization and acute care in later life. It can be used for convalescent hospitals, hospices, and certain outpatient treatments like day surgery, radiotherapy, and so forth. There is an element of risk pooling among family members, as it can be used to pay the bills of one's spouse, children, siblings, or parents. Any unspent balance in Medisave is passed on to the account holder's beneficiaries upon his or her death.

Medishield was introduced in 1990 as low-cost top-up catastrophic illness insurance (with premiums payable from Medisave) to supplement Medisave. Medifund was launched in 1993 as a means-tested public safety net of last resort for the needy. Since the 3Ms formula was not designed to take into account the long-term care needs of the elderly, new plans like Eldercare and Elderfund have been added to finance long-term care of the elderly. The government has periodically topped up (from budget surpluses) the various plans to benefit the less well off and the elderly. The Singaporean system has tried to reconcile the Singaporean ingrained aversion to welfare with the reality that for both economic and political reasons, it must ensure the provision of health services to the whole population, including low-income earners and the poor.

Health care provision comprises a mix of eight public hospitals and five specialty centers, which together account for 80 percent of inpatient beds with 13 private hospitals accounting for the remaining 20 percent. Primary health care is accessible through an extensive and convenient network of private general practitioners (80 percent) and public outpatient polyclinics (20 percent). An estimated 12 percent of daily outpatient attendances are by traditional Chinese practitioners in the private sector. Since 1985, every public sector hospital has been restructured and granted autonomy in operational matters in order to infuse private sector efficiency and financial discipline, but the government retained 100 percent ownership of hospitals. Endeavoring to inject market forces into the system, the restructured hospitals, initially managed by a monolithic government company, underwent further reorganization in 2000, bifurcating into two competing clusters—the National Healthcare Group and the Singapore Health Services, but ultimately reporting to the Ministry of Health (MOH). Until 1999, the MOH upheld a structural approach with strong regulation, organization, and management, assuming that good doctors and facilities would be conducive to good processes and outcomes. For the past decade, Singapore has switched to a broader multidimensional concept while monitoring clinical indicators and medical errors.

The first National Quality Control Circle Convention was held in 1982, and ever since, health care managers have embraced total quality management (TQM) and quality improvement principles. No hospital or specialist medical center in either the public or private sector has been without a quality committee, usually chaired by the hospital's chief executive officer. Such a committee has overseen all quality-related initiatives organization-wide and kept track of key performance indicators. Health care managers lacked the knowledge and tools for objective measurements and evaluations of clinical quality at first, but that has started to change. Hospitals were monitoring a handful of clinical indicators such as unplanned readmissions and nosocomial infections, but absent standardization, no valid comparisons could be made. Owing to growing awareness of progress in the science of performance measurement in tandem with trends in Western industrialized countries, health care providers have adopted a systematic and scientific approach to clinical quality.

Since 1990, all health-related organizations such as hospitals, polyclinics, insurance companies, pharmacies, and the CPF board have been linked by MediNet, an electronic data interchange system comprising six components: central claims processing, national patient master index, procurement, information, service, and notification. This extensive use of information technologies serves valuably to compile accurate and timely clinical data. In 2000, the MOH mandated all acute care public and private hospitals to take part in the Maryland Quality Indicator Project (QIP), which has involved monitoring a set of clinical quality indicators while benchmarking them against national and international norms. Monitoring inpatient mortality, perioperative mortality, device-associated infection in the ICU, and so forth has provided hospitals with comparative feedback in the form of quarterly reports and data analyses that spurred them into action to improve quality. Hospitals in both the public and private sectors have engaged quality managers full time to measure clinical processes and outcomes instead of simply leaving it to individual doctors to decide what works best for their patients.

In 2001, five former national agencies were amalgamated into a new statutory board, the Health Sciences Authority (HSA), to regulate health products (blood, drugs, supplements). In 2002, the MOH set up a Health Regulation Division out of the former Medical Audit and Accreditation Unit, with broad responsibilities for licensing and accreditation, legislative enforcement, surveillance, clinical audit, and quality assurance, including implementing clinical pathways and best practices in disease management.

The question of whether the 3Ms system had managed to contain costs was a bone of contention. Barr (2001) contended that Medisave, the institutional linchpin of the "personal responsibility" attitude, cultivated frugality because everyone who could possibly afford to pay anything was paying something for his or her own health care. Pauly (2001) pointed to the low share of GDP spent on health care compared with other industrialized countries. However, exogenous factors such as the nation's unique ethnic and cultural mix, the healthy diet of the largely Chinese population, and the absence of a significant underclass may account for that alleged thrift. Looking at crude figures, Singapore seemed to have it both ways: Patient satisfaction was reportedly high (85 percent), an average waiting time for elective surgery was two weeks, standards of health were among the highest in the first world, and all of this has been delivered at an affordable 3 to 4 percent of GDP for the last three decades. This responsive, economical, and high-quality health system means that Singaporeans appear to be getting good value for their money.

The Netherlands: Dutch-Managed Competition—Getting the Full Monty

In countries such as the Netherlands, Belgium, and Germany, some of the large-scale health insurance funds owe their existence to local initiatives taken in the nineteenth century, when groups of people with a social conscience (e.g. community leaders, employers, physicians, nurses) worked together to provide more secure financial circumstances and medical care for those in need (information in this section from Companje and others, 2009; Helderman and others, 2005; Götze, 2010; Van de Ven and Schut, 2008; Okma and others, 2010; Enthoven and Van de Ven, 2007; Tuijn and others, 2011; Schoen and others, 2009). In the 1980s, demographic aging had already loomed large, but it was not until the 1990s that the health "dossier" gained a European dimension, when European policy makers paid heed to "social Europe" in addition to "economic Europe." The Treaty of Rome of 1957 endorsed free-market mechanisms and rejected government monopolies not solely for services such as telecommunications, post, and transport, but also for health insurance.

In the wake of European integration, the Netherlands adopted a stringent Competition Act. A new Dutch Competition Authority (NMa) made it clear that it would safeguard any room for competition in health care created by the government, bearing in mind that the search for specialist treatment or a bed in an old-age home no longer stops at a country's borders.

In 1941, German authorities occupying the country coerced their new subjects into a mandatory health insurance plan for low- and middle-

income groups. By the end of the 1960s, the government feared that rising health care costs would jeopardize universal access and inflate labor costs to the extent of raising unemployment to the detriment of the Dutch export-based economy. In light of such concerns, both supply and regulation have been amplified from the mid-1970s forward. Following the economic shock of the oil crisis in 1973 alongside fears of insufficient governmental planning to accommodate an aging population, welfare policies changed in the early 1980s. The Health Care Prices Act (1982) circumscribed physicians' fees and later also their total revenues; medical specialists were forced to forgo fee-for-service (FFC) payments in favor of a "lump-sum payment" per hospital (or institution) for all specialists working in that hospital. Open-ended hospital reimbursement had given way to a budgeting system that was subsequently expanded to all other inpatient care institutions.

In 1986, the center-right government assigned the Dekker Committee to draft a proposal for reform. Issued in 1997, the recommendations of the Dekker Committee ripened into the Health Insurance Act (HIA) of 2006. During those two decades, incremental changes laid the way open for regulated competition. Reflecting the rise of New Public Management ideas in the 1980s and hinging upon the ideas of the American economist Alain Enthoven about "managed competition," the Dekker plan portrayed a market of mandatory insurance with competing health insurers and open enrollment. Seventy-five percent of the plan was meant to be financed by income-related contributions paid to a central fund, redistributing them back to insurers based on their risk structure in order to level the playing field and remove incentives for risk selection and cream skimming.

The first health reform bill passed in 1989, but the process came to a halt. The 1994 "purple coalition" shelved the reforms and opted instead for piecemeal improvement. The Dekker plan rose from the ashes when the 2003 governing coalition of Liberal Conservatives and Christian Democrats decided to take up its basic ingredients and place even greater emphasis on market competition. On January 1, 2006, the Dutch government enacted the HIA. The new law obligated each person legally living or working in the Netherlands to buy individual private health insurance from a private insurance company. This basic health insurance has supplanted the former mix of (social) public and private health insurance.

Each basic health insurance plan administered a legally prescribed package of benefits and entitlements, including preventive services, inpatient and ambulatory medical care, prescription drugs, and medical aids. Insurers have been legally bound to accept each applicant for a basic insurance contract at a community-rated premium without excluding

coverage due to preexisting conditions. Funding has consisted of a mix of direct contributions, earmarked taxes, and government subsidy. Employees have had to pay an income-related contribution for which employers have been compelled to compensate their employees regardless of their chosen insurer, and that compensation has constituted part of employees' taxable income. Other adults have had to pay a community-rated premium directly to their chosen insurer. The tax collector, in turn, has transferred contributions to a Risk Equalization Fund (REF). For high-risk insured people, insurers have received a high-risk-adjusted equalization payment from the REF. For low-risk insured people, insurers have had to pay an equalization payment to the REF. Hence, insurers' incentives for risk selection have been substantially reduced, though not utterly removed. Insurers have been at liberty to give premium rebates to groups (up to 10 percent for mandatory basic insurance, but higher for supplementary health insurance or other insurance products) organized by employers, sports associations, and so forth. An organizer of a group could selectively enroll preferred members only. The government has paid for all costs incurred by children. Households have collected a care allowance in case the average community-rated premium exceeded a certain proportion of their income. About two-thirds of all households have been enjoying that allowance since the HIA's enactment. People could supplement their insurance with benefits not included in the mandatory basic package such as dental care for adults, physiotherapy, eyeglasses, alternative medicine, and cosmetic surgery. For such extra insurance, insurers could select risks, refuse applicants, or levy risk-adjusted premiums. Around 93 percent of insured people have opted for supplemental insurance (usually from the same insurer providing their basic coverage), so insurers have had opportunities to select.

The Dutch Health Care Inspectorate (IGZ), an independent agency within the Ministry of Health, Welfare, and Sport, has been monitoring quality of care by enforcing 25 laws such as the Care Institutions Quality Act. That prime regulator has been carrying out regular inspections, responding to complaints with focused investigations, and monitoring performance on a regular basis. Apart from addressing specific issues (often at the request of the minister or the parliament) and responding to calamities that unearth structural shortcomings in care provision, since 2002 IGZ has been developing risk-based indicators to assess the quality of health care. Indicators have been devised in cooperation with representatives of the health care sector. Every institution deemed unsatisfactory by IGZ inspectors has been compelled to improve and subject to follow-up visits; if deficiencies have not been rectified, IGZ could sanction penal measures. When compared with

health systems of other developed countries, the rather new Dutch system seems to pull through, offering responsive, high-quality health care.

Argentina: Promoting a Health Care System under a Sick Economy

Dating back to the 1940s and 1950s, Argentina's fragmented health system has been an upshot of protracted struggles between the Ministry of Health (MOH) and the Ministry of Labor and Welfare (information in this section from Lloyd-Sherlock, 2005, 2006; Barrientos and Lloyd-Sherlock, 2000; Belmartino, 2000; Cavagnero, 2008; Cavagnero and Bilger, 2010; Rubinstein and others, 2007). The former erected and presided over an impressive national network of publicly funded hospitals and other health facilities while the latter aspired to buttress labor unions via Social Health Insurance (SHI). Over the next decade, it became clear that the SHI sector had won, and direct state funding to the MOH was scaled back and became more erratic. SHI had required affiliates to make compulsory contributions to a fund, which in return provided services or contracted them out to third-party providers. Contributions have been set at a certain percentage of gross salaries, deducted from workers' monthly payrolls, and sometimes matched by contributions from employers and the state. Those who had not contributed, or were not dependents of contributors (usually immediate family members), were not entitled to services provided by SHI funds.

Argentina's SHI evolved out of mutual aid societies that hark back to the start of the twentieth century. The sector had come under the supervision (but not control) of the Ministry of Labor and Welfare in 1946, and affiliation became compulsory for workers in 1970. By the 1990s, SHI was largely in the hands of 300 or so different *obras sociales*, most of which were run by trade unions and theoretically regulated by, but autonomous of, the state. Each fund had monopolistic rights over a demarcated sector of the labor force, and workers could not choose between funds. Most funds were too small to provide services, so they contracted out to private clinics and hospitals, giving rise to a large private sector. Absent state regulation, that purchaser-provider split rendered the system of contracting and subcontracting chaotic and unaccountable and was by no means conducive to efficiency and competition. In terms of funding then, Argentina's health system has consisted of three pillars: the publicly financed sector, social insurance funds (known as *obras sociales*), and private plans.

Until recently, *obras sociales* were exempt from catering to members once they retired. *El Programa de Atención Médica Integral* (PAMI), a separate health insurance fund for pensioners, was designed to fill that gap. As with

obras sociales, PAMI mainly contracted out to private providers, although there was also "leakage" of affiliates to the public sector. PAMI has been financed through a separate wage tax and provided a range of services to all insured people aged 60 or over and in theory noninsured aged 70 or over.

SHI funds administered by the *obras sociales* ran at the national (*obras sociales nacionales,* OSNs) and provincial level (*obras sociales provinciales,* OSPs). Many of the OSNs' funds have been managed by unions associated with particular industries. The majority of them did not have their own facilities, so they paid for care provided in public and mostly in private institutions. Unlike most countries in the region, the Argentine social health insurance has never been merged into a unified, national institute of social security. Instead, Argentina has been upholding a "corporatist atomized private model" that severed different occupational groups into exclusive, quasi-noncompetitive sickness funds.

Private health insurance first emerged in Argentina in the late 1960s. The industry has comprised for-profit (*Prepagas*) and not-for-profit (*Mutuales*) sectors that have provided voluntary plans mainly for high-income groups, supplementing what they have been obliged to take with *obras sociales.* With no regulatory framework, insurers have varied tremendously in terms of their size and the degree to which they relied on third-party providers; *Prepagas* have been largely criticized for high operating costs and lack of transparency.

Following a grave economic crisis in the 1980s, Argentina faced profound changes to its economic structure and political system, since the crisis brought forth a marked drop in production, accelerated inflation, and high unemployment. The health sector was reformed in the 1990s, putting in motion managed care and market-oriented policies, and setting the stage for decentralization, self-management of the tax-funded health sector, and restructuring the OSNs.

By the 1990s, Argentina's publicly funded health sector suffered from decades of underfunding to the detriment of quality. Aside from holding back the publicly funded sector, the *obras sociales* were able to seize substantial resources from it. Both *obras sociales* and private insurers were permitted to send their affiliates to public hospitals, but in principle had to pay for these services. Large numbers of affiliates used the public sector particularly for more expensive and complex treatments as low-wage earners could not afford the copayments charged by their insurer. However, hospitals were rarely reimbursed. This lack of indemnity (a large free-riders effect) further reduced the resources available for uninsured Argentines. Furthermore, almost all parts of the health system suffered from a heavy bias

toward expensive curative services by specialists and overlooked more basic interventions and therapies. Basic health services including prevention, education, and promotion were mainly the responsibility of provincial health ministries and were frequently underdeveloped compared with other countries in the region. Access to basic services was near universal, but quality was often extremely poor due to fragmentation and inefficiency; many public health clinics in Buenos Aires lacked access to piped water.

Between 1993 and 2002, Argentina implemented a number of health reforms mainly through decrees. The first step of the reform in 1993 was to allow competition among OSNs. From 1993 on, the OSNs' monopolistic rights over the formal labor force of each sector have been terminated, and workers opt for an OSN of their choice. From now on, OSNs would have to compete with one another for members, but membership continued to be compulsory for formal workers and their dependents. Public hospitals were given greater financial and managerial autonomy and were no longer financed through global budgets, but rather have been paid for services actually provided. They were allowed to recover costs from either health care insurers (that is, private and social health insurances) or those individuals who could afford to pay. These measures aimed to improve efficiency and resource allocation by subsidizing the demand for services rather than their supply.

The Solidarity Redistribution Fund (FSR) was modified in 1995. That fund has been collecting a percentage of all contributions, redistributing it to OSNs whose members have not reached a minimum level of contributions. In the past, those transfers were discretionary, so the FSR did not manage to shift funds from poorer to wealthier funds. Henceforth, the FSR was to function on the basis of preestablished criteria. The FSR has been an income adjuster rather than a risk adjuster, because it has equalized different income levels of OSNs independently of the risks of their affiliates. In 1996, a standard benefits package was introduced, the Obligatory Medical Program (PMO), to be provided by the OSNs and private health insurance. Following the economic crisis, by 2002 few modifications had taken place: The Emergency Obligatory Medical Program (PMOE) superseded the PMO. In addition, the National Policy on Medicines was implemented. The latter included the law entitled "campaign for the utilization of generic name medication" and public provision of basic medicines through a program called *Remediar*.

Outcomes fell short of expectations as self-managed public hospitals have waived indemnities and reimbursements, since OSNs and other third parties staved off payments. In 2002, between 20 percent and 30 percent of

those who used public hospitals had some form of formal coverage; notwithstanding, cost recovery accounted for just 3.5 percent of the budget of provincial hospitals. Due to the economic crisis, devaluation, and sky-rocketing costs of imported drugs, 160 OSNs covering 86 percent of the system affiliates could not assure the PMO to their affiliates. The PMO was therefore replaced by the PMOE, aiming to prioritize basic services in light of the economic situation. Some services were suspended and copayments for pharmaceuticals grew from 40 percent to 60 percent. The *Remediar* program was successful in providing basic drugs to those more vulnerable while strengthening primary health care. The program has not only dispensed free basic drugs, but also rendered medical consultations in primary health care centers (CAPS), all of which have been, unlike before, strictly free of charge. From 1997 to 2002, 9 percent of the population lost its social health insurance primarily because of unemployment or informal occupation.

During the crisis's apogee (2001–2002) indigent patients refrained altogether or held up whenever they felt they needed health care. Hopes to consolidate and streamline social health insurance turned out to be forlorn. It was expected that after several years of competition, the number of funds would decline from over 300 to fewer than 50, since small, uneconomical, and poorly managed funds would vanish. The sector remained highly fragmented, and the number of funds was barely reduced (from 312 in 1993 to 268 in 2003). Despite its considerable growth during the 1990s, the private sector has remained badly regulated both as a provider and as an insurer; the bill that aimed for stricter regulation has never been ratified by congress or enacted as a law.

Argentina has not taken on advanced scientific tools and methods (such as Economic Evaluations) to ration health services. Rather than apply rigorous, evidence-based criteria, decision makers allocate resources quite poorly based on institutions, precedents from prior decisions, and social pressures plus fears of litigation.

Australia: A Public-Private Seesaw

When the federal health department was established in 1921, it had a mandate to cooperate with the states in health matters (information in this section from Philippon and Braithwaite, 2008; Healy and others, 2006; Palmer and Short, 2000; Hall and others, 1999; Savage and Lu, 2007). In 1946, a constitutional amendment enlarged the role of the commonwealth (the federal Australian government) further to include health policy. The

commonwealth has been vested with the right to make laws affecting health, including the provision of pharmaceutical, sickness, and hospital benefits, and medical and dental services. The commonwealth became the dominant player on matters pertaining to physicians and pharmaceuticals; hospital matters including arrangements with medical staff and nongeneral practice in the community remained in state hands.

In subsequent years, the postwar health care system consolidated. Under the Pharmaceutical Benefit Act of 1950, the commonwealth subsidized drugs, and medical services were added under the National Health Act 1953. Health insurance premiums have been community rated (that is, everyone pays the same premium for the same product, irrespective of their risk or previous claims) since 1953 to ensure that private insurance is within reach of all regardless of their risk.

Medibank, a national health insurance plan, was introduced in 1975 after a political debate; the Health Insurance Commission was established to administer the plan. The Liberal-led coalition government (1975–1983) made a series of changes to Medibank: Individuals could opt out of Medibank and purchase private health insurance, or pay a levy of 2.5 percent of taxable income to remain in the plan. By 1981, a significant proportion of the population was not effectively insured for hospital treatment. Public funding for health care, principally for public hospitals, continued to be negotiated periodically between the commonwealth and the states.

Medicare superseded Medibank in 1984. This unique plan among developed nations combined universal health insurance financed through taxes and a component of private health insurance. In 1970, prior to introducing universal public insurance, 80 percent of the population held private health insurance. Coverage has since declined, dropping to 50 percent in 1984 when Medicare was first introduced, and further backsliding to 30 percent toward the end of the 1990s.

Medicare, the tax-funded national health insurance plan, has offered patients subsidized access to their doctor of choice for out-of-hospital care and subsidized pharmaceuticals. All permanent residents of Australia have been entitled to free treatment in a public hospital under Medicare. Inpatient medical services have been provided for public patients by salaried (public) hospital doctors; patients have not been billed for such services. Patients with private insurance have had the right to be treated as public patients, thereby avoiding both hospital charges and drawing on any private entitlements. The structure of the financing system has borne heavily on privately insured Australians. Not only have they been facing

rising premium costs, but when treated as private patients they have found themselves facing large, often unpredicted out-of-pocket expenses. Insurance has not covered the difference between scheduled medical fees and actual fees charged. Moreover, privately insured patients had often been treated in a public hospital, side by side with public patients—same accommodation, same nursing staff, and same doctors, but afterward received a pile of bills without being fully recompensed by their insurance, whereas the public patient never saw a bill.

The Australian government introduced financial incentives in July 1997 to encourage Australians to acquire private insurance in order to curtail public usage of public hospitals. Accusing wealthy households without insurance of free riding on Medicare (30 percent of wealthy households had been uninsured when the measures were foreshadowed), positive incentives for low-income earners were juxtaposed with financial penalties for high-income groups. For example, singles earning less than $35,000 per annum and couples earning less than $70,000 per annum were eligible for a rebate on private insurance premiums. The income threshold for families was raised by $3,000 for each dependent child in that family. High-income earners such as singles earning above $50,000 or couples earning above $100,000 without private insurance were charged an income tax surcharge of 1 percent. These incentives, however, did not curb cost pressures in the system or address large out-of-pocket costs that had made private insurance unpopular. From January 1999, a nonmeans-tested 30 percent tax rebate offered to those taking out private health insurance replaced former subsidies. In 2005, the rebate was increased to 40 percent for people aged 70 and older, and to 35 percent for those aged 65 to 69.

In 2000, "Lifetime Health Cover" impelled individuals to obtain health insurance while still young and retain it by allowing premium levels to rise with the age at which a person joins a health fund. The base insurance premium applied to anyone taking out health insurance up to the age of 30. These people were paying base premiums as long as they remained insured, although it did not protect against an increase in the base premium over time. The premium paid increased by 2 percent for each year the individual was over 30 at the time of first joining an insurance fund, with a ceiling at 70 percent above the base premium.

Savage and Lu (2007) found that privately insured people had used private hospitals more but not at the expense of public ones, so private insurance did not relieve the burden on public hospitals. Financial incentives did bear fruit as within half a decade, private coverage mounted from 30 percent to 43 percent of the population.

The Australian health system has been unique in terms of extensive public-private and state-commonwealth interaction. The commonwealth has subsidized a substantial proportion of all expenditure on health care such as on services rendered by doctors in private practice, by private nursing homes, or for pharmaceuticals provided by the private sector. Although the commonwealth has paid the lion's share of doctors' fees in private practices and for medical education, all aspects of legal control of the profession, including registration and setting fees, reside in the states. The registration of private nursing homes has been vested in the states, but the commonwealth has accounted for a vast part of their income through subsidies. The commonwealth financing services and the states administering them have given rise to inevitable tensions. States' funding for health care has come from their share of tax revenues in goods and services produced under their jurisdiction, block grants and specific purpose payments from the Australian government, funding out of their own fiscal resources, and funding provided by nongovernment sources (usually user fees). Within the state budgetary process, the health portfolio has accounted for up to 40 percent of recurrent funds. Commonwealth health grants to the states under the Australian Health Care Agreements have been based on a population formula plus components of performance measurement. First formalized in the 1984–1988 agreement, the Australian Health Care Agreements (funding mainly for public hospitals) have been negotiated every five years between the commonwealth and state governments. The commonwealth has accommodated the states with capped block grants that the states generally have regarded as insufficient to cover hospital costs. The agreements set out a number of conditions and performance indicators, including service targets, but allowed the states flexibility over allocating resources to hospitals. In turn, states have been compelled to provide free treatment in public hospitals to all eligible persons. The commonwealth could deduct health grants for states from other revenues it owed the states. Some grants have been subject to "fiscal equalization" to ensure that all states are able to provide an adequate level of services without levying higher taxes or surcharges upon their citizens, so in effect the poorer states are cross subsidized by the richer states.

The Australian government ventures perennially to improve health care quality, outcomes, and access (AIHW, 2008), inaugurating, for example, a program to monitor general practice in April 1998. The Bettering the Evaluation and Care of Health (BEACH) program took on to collect new samples of data from about 1,000 GPs each year, monitoring eight health conditions declared as National Health Priority Areas by both the federal

government and states. BEACH has undertaken to increase certain GP payments and reduce patient costs, create payment incentives through the Medicare plan to boost GP to better manage chronic diseases, and foster preventive health checks among at-risk groups. Australia ranked high in international measurements that compare the health of populations and has constantly improved in many areas. Every year, Australia has spent more on health, even after allowing for inflation: Over the past decade, its spending grew from 7.9 percent to 9.4 percent of all spending on goods and services (AIHW, 2012).

Education

Education is the primary means through which people are socialized into their society and prepared for a productive work life. It can be predominantly provided by public actors (as, for instance, in France and the United States), or by a mix of public and private actors (as, for instance, in the Netherlands). It can be centrally controlled (as in France), or it can be more decentralized (as in Britain and the United States). In the past four to five decades education has been subjected to reforms from the primary up to the higher education levels.

Wisconsin: Vouchering Together—Unlikely Allies in Milwaukee

In 1962, Milton Friedman, a conservative University of Chicago economist, argued that the government should subsidize education but not operate schools and advocated a relatively unregulated voucher plan (information in this section from Fowler, 2003; Hoxby, 2000, 2007; Belfield and Levin, 2002; Greene and others, 1998; Rouse, 1998; Farrell and Mathews, 2006; Waggoner, 1996; Witte and others, 2012). In the 1970s, most children in the United States attended the public school to which they had been zoned by their school board; parental choice and experiments with vouchers were sporadic and sparse. Almost two decades later, increased parental choice was the main driving force behind reforms in elementary and secondary schooling. Reforms had to do with intradistrict choice, interdistrict choice, and vouchers for private and/or charter schools. Charter schools are public schools that operate under a negotiated charter and are financially supported by a fair share of state funding that their students would have received if they had attended a school in their home district; admission cannot be selective. Many economists believe that market competition

improves both technical and allocative efficiency in the use of resources, since suppliers must strive to be efficient and consumers have more choices. School choice proponents do not favor government-operated monopolies and blame them for the system's problems. The premise that private schools are more efficient than public schools lies at the bottom of many reforms.

A late 1970s policy paper distributed by the Heritage Foundation during the Reagan presidential campaign suggested funding vouchers for private schools with public dollars. Hinging upon urban decline in terms of public education, vouchers would enable inner-city parents to accommodate their children with high-quality private education long enjoyed by those who were predominantly middle class and white. Milwaukee Public Schools (MPS) serve the impoverished population of minority students who consistently perform well below their counterparts in other areas of Wisconsin. In January 1976, federal Judge John Reynolds ruled that the Milwaukee Public Schools were unlawfully segregated. MPS responded with a program to integrate the public schools and improve educational achievement. From 1973 to 1993, real spending per pupil increased by 82 percent, but the graduation rate dropped from 79 percent of each freshman class to merely 44 percent. Rising costs and falling test scores impelled Wisconsin Governor Anthony Earl and Superintendent of Public Instruction Herbert Grover to commission an independent inquiry in 1984 to render a comprehensive review of public education in the region. The Study Commission found alarming disparities between low-income students and students from middle- to upper-income families. The report portrayed many MPS schools as ineffective, bankrupt institutions in terms of test scores and dropout rates. For years, MPS had informed the public that a majority of students were performing near the national average. The widely reported conclusion concealed the since-discarded definition of "average" that included students with scores as low as the twenty-third percentile nationwide. A 1990 research project revealed even more disturbing results regarding MPS in general and minority students' scores in particular.

In the late 1980s, Annette "Polly" Williams, a Democratic Wisconsin representative, a fiery African American, and former welfare recipient, aligned with conservatives around the nation when she called for choice in Milwaukee's public schools. This unique alliance between middle-class white conservatives and more liberal, inner-city minorities was strengthened by African American parents' disenchantment with the educational promise of school desegregation. After more than a quarter century, school desegregation seemed unresponsive to complex educational and social needs of those black students it was supposed to help. The time was ripe for

"the Rosa Parks of School Choice" to convince Governor Thompson and Wisconsin to set in motion a voucher system.

The Milwaukee Parental Choice Program (MPCP) was enacted on April 27, 1990, by the Wisconsin Legislature as part of a larger budget bill. With the adoption of the MPCP, Wisconsin became the first state in the nation to implement a parental choice program involving the use of private schools as an alternative to public schools. From the 1990–1991 school year, qualifying Milwaukee residents could choose among three options for their children: neighborhood public schools, public magnet schools, and non-sectarian private schools. Only private sectarian schools were excluded, but not for long. In 1995, 100 low-income families stepped into the precarious terrain of state versus religion and filed a lawsuit in the federal courts. Demanding to include parochial schools in the choice program, parents asserted that excluding such schools deprived them of their right to free exercise of religion in violation of the First Amendment and equal protection under the law in violation of the Fourteenth Amendment of the U.S. Constitution. Courts finally yielded to the parents, and private sectarian schools including religious ones were added to the MPCP.

The superintendent of public instruction administered the program. Upon receiving proof of a student's enrollment, he was required to pay the private school with funds that would otherwise go to the public school district. The statute also obligated the superintendent to ensure that Milwaukee citizens were informed annually of participating schools, so that students could meet application deadlines. The legislation limited eligibility to students whose family income did not exceed 1.75 times the federal poverty line. To qualify and remain in the program, a participating school was prohibited from discriminating on the basis of race, color, or national origin and had to accept applicants on a random basis. Schools were allowed to charge no additional tuition besides the voucher and obligated to supply certain information to the superintendent of public instruction.

Apart from expanding educational choices for low-income students, the program's proponents envisioned that it would engender educational success owing to competition between the public and private educational sectors while spurring thrift and innovation. Since its inception, the program has resonated throughout the nation; many research projects broached parental choice. It has been found that most Milwaukee parents and students were pleased with the program. Contrariwise, findings concerning academic achievement have been inconclusive at best, and altogether contradicting at worst. In carrying out his statutory responsibility for

evaluating the program, Grover, the superintendent of public instruction, appointed John Witte (a professor of political science and public affairs at Robert M. La Follette School of Public Affairs at the University of Wisconsin–Madison) to conduct research in strict compliance with the statute. He found that choice students remained approximately equal to low-income students in MPS; there were no significant gains to be found in terms of test scores amid MPCP students (referenced in Waggoner, 1996). Witte's conclusions were castigated on the grounds that too few students participated in the MPCP and too little time has elapsed to draw any meaningful conclusions about academic performance, so the evaluation had been "biased against finding choice schools effective" (Waggoner, 1996, p. 178). Since students who took part in the program possessed certain characteristics as well as those who dropped out of it, it was impossible to randomize selection, not to mention that many children switched between public and private schools during research. Factors impacting academic achievement (such as family background, residential area, and so forth) are intricate and impossible to disentangle from that of the school's influence alone. After controlling for variables, which may confound results, Greene and others (1998) have found positive and significant results for math and reading for students taking part in the program for three to four years and concluded that choosing private school does enhance test scores and improve academic achievement because choice allegedly enables a closer match between school qualities and students' needs. It may well have been that magnet schools in Milwaukee had adapted and become more responsive in order to lure students back to the public schools and gain funds equivalent to the size of their vouchers.

Hoxby (2000; 2007) was criticized for her dataset, but still held on to her claim that increased market pressures on public schools had improved achievement and had lowered costs because parents better matched their children with schools. Rouse (1998) juxtaposed students in the choice schools with students from the Milwaukee public schools and found that students in the MPCP had gained rapidly in terms of math scores, but not in terms of reading scores. Belfield and Levin (2002) conducted metaresearch by surveying 41 empirical studies dealing with school choice and professed that enhanced competition does bring about positive gains, though modest in scope. More recently, a team headed by John Witte, the first researcher who had been appointed to evaluate the program in 1990, has found that students who had participated in the MPCP in the 2006–2007 school year had higher reading achievement in the 2010–2011 school year (with an effect size of 0.15). Conversely, there was no difference in math achievement.

Farrell and Mathews (2006) portray a gloomy picture of "alarming deficiencies" demonstrated by choice schools, some of which lack ability, knowledge, skills (namely, resort to unqualified teachers and administrators), or even will to educate their low-income, principally black students. For many schools, state voucher payments are their only source of income. Sometimes, staff paychecks are not issued until the voucher checks arrive. Lenient legislation allowed anyone capable of meeting a few building code requirements and securing an occupancy license to open a school. Vouchers have therefore preserved existing private schools and triggered new, low-quality ones.

Despite inconclusive evidence, vouchers have become more and more popular; they are seen as a panacea for public education maladies. Once the choice show has gotten on the road, the voucher wagon can no longer be diverted from its route. Across the nation, champions of both the private sector and reform have used the MPCP as their operational model. Following stinging defeats of voucher referendums in Michigan and California for the second time in 2000, proponents of vouchers have focused attention on convincing individual legislators of the efficacy of publicly funded vouchers, rather than relying on a majority of voters to move the school voucher initiative forward at the state level. At the federal level, vouchers were approved in September 2005 for students whose education had been disrupted by Hurricane Katrina. The MPCP has been cited in campaigns for voucher bills in Virginia, New Mexico, New Jersey, New York, Georgia, and a number of other states. The ally of inner city black liberals and white middle-class conservatives has conceived of vouchers as the educational salvation of low-income minority students.

France: Contractualization *au Courant—Le Central* Unleashes Higher Education

Since the early nineteenth century, the higher education system in France has been mostly in the public sector. From 1885 on, 15 universities were established as places for giving specific teaching to students. These universities were collections of five faculties (the same in all universities: theology, law, medicine, arts, and science) headed by a university council vested with no actual power and a president appointed by the central government of the day. Since the *grandes écoles* had already been training elites efficiently and prestigiously, these universities struggled with their role in higher education. This struggle intensified in the 1960 with the beginning of mass higher education (information in this section from Chevaillier, 1998, 2001; Kaiser, 2007; Deer, 2002; De Meulemeester, 2003; Daun, 2004).

The USSR-like central planning persisted throughout the 1950s and 1960s, as it was deemed efficient for the postwar reconstruction of economic infrastructure. The economy grew more complex alongside a rapid change in the way of producing goods and services. Since the needs of the population could no longer be easily foreseen, central planning was rendered a rigid and wasteful form of organization.

A vibrant student movement inspired Edgar Fauré's framework law of 1968 that was the basis of university organization for many years. The act provided for funding of institutions through block grants. Structural changes started to counteract the inability of central administration to run a system undergoing diversification and differentiation. The number of students grew when France, earlier than any other European nation, moved rapidly from elite to mass higher education. The changing terrain of higher education encompassed a large number of institutions distributed more evenly across the national territory forging new links with local business and local authorities. With more young people in need of education and training for different types of jobs, students and other stakeholders put great pressure on universities to diversify and create new programs. The control of the state on the curriculum by accrediting programs became more complex.

The most peculiar feature of French higher education has been a strong public research sector outside the universities alongside an elite sector of vocationally oriented, specialized institutions. Since the 1970s, the links between the universities and the research sector have grown, and the 1968 law gave the university professoriate the status of *enseignant-chercheurs* ("teacher-researchers"), stressing their research vocation.

In 1976, a new allocation method supplanted block grants. Under GARACES (the acronym for Committee on Analysis and Research on Activities and Costs in Higher Education) funds were allocated to a university for general and teaching activities, and were directly linked to the buildings used for teaching and the overall teaching load. GARACES bore heavily on academic programs: Since new programs brought more funds once they were accredited by the ministry, hundreds of new programs, often well designed and popular with students, were developed. When it came to existing teaching programs, academic pressure groups (especially disciplinary groups) managed to mandate new subjects and lengthen the duration of courses.

In 1983, a major reform transferred a large share of responsibilities and fiscal resources from central government to local authorities. Decentralization laws gave rise to a tripartite contractual regime involving the respective central

authority, the regional authorities, and the universities and/or central institutions, setting the stage for large-scale four-year contracts yet to come. Regional and local authorities have been officially goaded into a more active role in financing and steering higher education and research at their own territorial level. Regional councils have financed and developed universities and higher schools, funding investment in equipment, new buildings, and current expenditures related to selected programs designed to meet the training needs of the local industry.

The National Assessment Council (*Conseil National d'Evaluation*) that had been forged in 1985 failed to engender real revolutionary changes. In 1986, an attempt to impose free-market values on French higher education by right-wing politicians impressed by Reagan in the United States and Thatcher in Britain fell flat. The delegate minister of higher education, Alain Devaquet, ventured to infuse a solid dose of decentralization into universities and render them more autonomous in terms of their management—in French terms, *régionalisation.* Those attempts to enhance accountability through strict evaluation procedures had jeopardized vested interests and culminated in political protest in which 600,000 fervent students and teachers swarmed the streets of Paris in early December 1986. Yielding to the clamor for keeping universities a free good, openly accessible, and essentially public, Devaquet resigned and the bill was dropped.

Lionel Jospin, the new minister of education, and his special adviser Claude Allègre ushered in a novelty in 1988: a contractual mechanism. Reorganizing central services pertaining to their administration, universities no longer received automatic funding corresponding to the number of students, having instead to justify their financial needs through a contractual mechanism between the central state and the president of the university. Those four-year agreements were applied both to the universities and to the CNRS (the French Research Council). Inside universities, decisions were made regarding the objectives to be attained and how much financial support they necessitated. Once a plan had been agreed upon, the president of the university bargained directly with the Ministry of Education. For some people, those contractual relationships demarcate a tipping point from which French universities have been born as independent and self-reflective bodies.

A new National Assessment Committee (*Comité National d'Evaluation*) initiated self-assessment exercises in order to lead institutions to evaluate themselves. New evaluation exercises were carried out at the level of a discipline or by regions. The results of such evaluations had only institutional impacts with no personal ramifications, which somewhat reduced

their incentive nature. The contractual policy spawned a new type of manager, as a new generation of university presidents, faculty deans, and heads of department developed plans and negotiated with the ministry. The ministry arranged for university administrators to be trained in managerial techniques. From 1983 onwards, decentralization, devolution (in its French version of regionalization), privatization, and greater financial autonomy coincided with similar occurrences in secondary schools.

In the late 1980s and early 1990s, enrollment in higher education spiked; the minister of education heralded the plan U2000 in 1990, inter alia to accommodate the wave of new students. This plan prompted central government and local authorities to coinvest in infrastructure for higher education for the sake of geographical coverage. The IUTs (*Institut universitaire de technologie*—the university institutes of technology) have been expanding the most. Although U2000 was deemed successful, the issue of research and the problematic situation in the Paris region have not been properly addressed.

The LOLF (*Loi organique relative aux lois de finances*), the law on the new public budgeting and accounting system, was introduced in 2001 but came in force for the higher education sector on January 1, 2006. Venturing to improve the transparency of the budgeting system and to make it more performance based, the new LOLF has rendered more information on the performance of the public sector to enable parliament to better formulate strategic policies and set priorities. Under LOLF, the agency responsible for a program has had to write an annual performance plan (PAP) to set forth objectives and performance indicators for the program. As an input for this PAP, higher education institutions have had to lay down indicators and deliver information regarding their attainment. A contract must subsume a precise and operationalized list of indicators in keeping with national objectives.

Since 2007, education and research have been split up into two ministries. The Ministry of National Education comprises only education up to secondary education. Higher education and research have been placed in the Ministry of Higher Education and Research. The performance of the French higher education system has been reckoned quite mediocre according to international rankings and comparisons such as the Shanghai ranking and the scores in Organization for Economic Cooperation and Development (OECD) states like Education at a Glance. Some blame the binary dual structure of universities and *grandes écoles*, but the low position in the rankings can be explained by the fact that universities and *grandes écoles* cover only part of the indicators used (prestigious teachers, excellent

research, and so forth). The lack of multidisciplinarity, the small size of *grandes écoles*, and poor funding may account for the inferior ranking.

The People's Republic of China: Between a Soviet Rock and a Western Hard Place—Higher Education on the Horns of a Dilemma

China experienced dramatic changes to its social systems throughout the twentieth century while Western patterns interweaved with those Soviet models on the stage of China's political and educational scenario (information in this section from Pepper, 1996; Xu, 2005; Law, 1995; Kang, 2004; World Bank, 1997; Ma, 2003; Zhong, 2007; Li and Zhang, 2010). The Western influence started in 1905 when Chinese students, who rushed to the United States, Japan, and France after civil service examinations had been abolished, came back. Those returning from overseas studies imitated mechanically foreign educational institutions, including curricula, textbooks, and teaching methods. The Soviet model of mass education forced its way from 1921 when the first institutions were set up in Hunan by Mao Zhedong and his friends. During the Yanan period (1934–1946), the ideology that embraced a modernized system of elite education vied with the practical theory of mass education for domination.

By 1949, the Chinese Communist Party (CCP) presided over not just an isolated rural hinterland but also the cities, coastal areas, and the South. In the early 1950s, the Soviet Union served as an ally, adviser, and inspiration for socioeconomic revolution. The pre-1949 republican system of higher education was aligned with the Soviet tripartite system to educate scientists and technologists for the sake of a new socialist China. The division of labor between higher education institutes in training different types of specialists was built on three basic types of institutes: comprehensive universities (responsible for education in the natural sciences, humanities, and social sciences), single-faculty institutes, and multifaculty institutes. The main purpose of this reform was to reduce the number of comprehensive universities and the branch of humanities and social sciences, but to increase the number of colleges related to the planned economy and applied subjects such as polytechnics, moral teaching, medicine, agriculture, politics, finance, economics, and so on. All rival forces such as market and religion that the CCP perceived to be associated with capitalism were eliminated or nationalized and their ownership and administrative powers were transferred to the state.

To balance quality and quantity in districts across the country, many universities moved from the eastern regions near coastal areas to the western regions and the internal continental part of the country. After

departing Americans and Europeans were superseded by Russians sent from the Soviet Union, 10,000 or more Soviet "experts" served in China during the 1950s, 700 of whom worked in higher education. The seductive Chinese bureaucracy has always been able to co-opt outsiders and alien dynasties. Criteria for enrollment in a course were foreordained to assimilate revolutionary sons and daughters into the rarefied world of China's intellectual elite based on key schools and family background. Rigid centralization served as a means to limit tertiary institutes', teachers', and students' deviation from plans and procedures outlined by the state. The Ministry of Education established departments and institutes, appointed the chief university executives and teaching staff, administered access to higher education, curricula, textbooks, and teaching references, and allocated material and human resources.

In 1966, Mao instigated a revolution, endeavoring to consolidate what had already been achieved in the economic base. As long as it was regarded as the main area controlled by revisionism and the bourgeois, the education system came under attack. During the Great Cultural Revolution (1966–1976), all formal education in China was stopped. Higher education existed in name only since all students in the middle schools and universities became "red guards" and joined the revolution while being denied any opportunity to study in formal education. Leaders of universities were eliminated from their positions. Almost everything traditional (Chinese) or Westernized was overthrown or replaced. Although the Chinese pendulum had been swinging between the West and the Soviet Union and between centralization and decentralization, all reforms were top down, initiated and ended by the central government. Embedded in a socialist society, education was owned by the government, funded by the government, and reformed by the government.

In the late 1970s, modernization through economic revitalization became paramount in tandem with Deng Xiaoping's leadership that opened up a new era of reform. By 1978, the Soviets' stronghold had dwindled. An important national conference for science and education brought economic modernization to the fore, laying emphasis on agriculture, industry, national defense, and science and technology. Deng Xiaoping believed that talented, highly trained personnel would spearhead modernization. Education reform came to the fore over the 1980s, attempting to advance international standards, modernize the socialist society, and form a virtuous cycle. The State Ministry of Education was changed to the State Education Commission in order to strengthen the ties between the central government and the education sector.

The CCP's Fourteenth Congress of 1985 endorsed economic reform to pave the way for a socialist market economy. The Chinese Communist Party Central Committee on the Reform of the Educational System advocated decentralization. Responsibility for public services was devolved to lower levels of government. Aside from a three-level management system for schools at the central, provincial, and major municipal levels, universities were given new powers, particularly with regard to the content and methods of teaching, and could even set up new programs and even new local institutions at the short-cycle level and in adult education. As higher education has become subject to the socialist economy market, legislative status was granted to universities and colleges, so they resorted to various ways to complement their income, since financial allocations from central, provincial, and the states' governments were insufficient. The reform had cast a plan to separate university administration from local party power, but it was suspended following the Tiananmen Square incident in 1989. In 1985, only about 10 percent of higher education institutions were chosen to test this pilot plan, which by 1993 was formally abrogated by the Central Committee. University presidents were installed by the state in spite of the fact that many department heads were elected.

The reform encouraged all sectors of society, including enterprises, institutions, public organizations or groups, as well as individual citizens, to run higher education institutions lawfully and to participate in and support the reform and development of higher education. The gist of the reform was twofold: transition from control to guidance in governance and shifting from full governmental funding to plural sources of funding. In the wake of progress toward mass education, Chinese higher education was no longer regarded as a political weapon but rather one of educating and cultivating. Those profound undertakings set the stage for future developments, which soon followed.

Throughout the 1990s, the Chinese government came to grips with issues of expansion versus quality. Since then, global attention to quality issues in higher education has reached an unprecedented level, as countries recognize the correlation between educational quality and economic growth, the need for greater accountability in times of declining resources, and the demands for systems to deliver value for money. After the central government had been reorganized, the State Education Commission was changed back to the State Ministry of Education. China has been extending enrollment in higher education since the beginning of the 1990s to match the student–teacher ratio of advanced countries and to construct a higher level of intellectual structure. In 1998, the Ministry of Education came up

with "The Plan for Revitalizing Education in the Twenty-First Century" to accelerate the development of education, planning to reach a gross enrollment rate of 15 percent by the year 2010. The goal was reached in 2002, eight years ahead of schedule, so within five years China reached the beginning stage of mass higher education.

On December 11, 2001, when China was finally admitted as a full member to the World Trade Organization (WTO), it also meant entering the international education market. The intrusion of foreign institutions, especially those from developed countries, posed new challenges, since they might have taken away more student resources. China's universities and colleges were compelled to find ways to measure up to international standards and survive competition. Communicating in languages other than Chinese, particularly in English, became cardinal. English had been tested in the national entrance examination ever since the open-door policy of the late 1970s, but only a certain percentage of the points had been added to the total mark; by the mid-1990s, English became one of three key subjects (in addition to math and Chinese) in entrance examinations. Those lucky students who managed to enter university practiced enhanced English studies and had to pass an English test before graduation.

In the mid-1990s, the government launched the "211" project to erect 100 first-rate universities in the twenty-first century. At the end of the 1990s, the "985" project endeavored to build several world-class research universities. Two major measures were taken to guarantee the quality of higher education in the process of decentralization. Under the direct administration of the ministry, all universities must apply yearly for approval of the number of students to be admitted. Other institutions apply to the provincial government for the quota, and the total of the province must be approved by the state government, so gross enrollment rates are commensurate with the increase in real GDP. Graduates have no longer been enjoying government-assigned jobs through a central placement system, as was the case up until the late 1990s.

In 2000, the ministry appointed a specialist group to work out a program to evaluate undergraduate education. In 2002, the newly forged evaluation system was put in motion; it has encompassed 44 points of observation covering all aspects of undergraduate education such as infrastructure, facilities, teaching staff, administration, teacher performance, student discipline, student abilities, and so forth. Following a preliminary assessment of all existing universities and colleges, all institutions of higher learning are supposed to be appraised every five years. Successive governments have tried various means to develop a Chinese way of reform,

combining socialist ideology and capitalist practice. The main concern remains the vast regional disparities; as China seizes opportunities offered by globalization, it struggles with daunting gaps between regions and between institutions that seem to grow larger and larger.

Britain: New Right, New ERA, Old Cleavages

Universal schooling began in England and Wales in 1870 when the Education Act established the basis for a state system of elementary education (a parallel law was enacted in Scotland in 1872) (unless stated otherwise, information in this section from Baldi, 2010; Sanderson, 1999; Timmins, 1996; Glennerster, 1998; Wolf, 2010; Blanden and others, 2005; Hlavac, 2007). The local government school boards (1870–1902) had raised rates to build schools and enforced attendance, which became nationally compulsory for the ages 5–10 and free-of-charge from 1891. Britain could no longer draw solely from the same narrow, traditional class to provide leadership in government and empire, so the state assisted and coerced poor parents to formally educate their children. At the turn of the century, concerns about competitiveness mounted as Britain declined from former economic world primacy while German and American goods swept the country. Education was also said to reduce juvenile delinquency.

The 1902 Education Act enabled county councils and county borough councils to set up Local Education Authorities (LEAs). Such committees administered schools within their jurisdiction and designed academic curriculums. The act consolidated the system into a three-tiered structure. The first tier consisted of universal, compulsory, and free elementary schools for young people between the ages 5 to 13. The second tier included voluntary, fee-charging secondary schools known as grammar schools into which students were transferred around age 11. Selection to these schools was primarily based on competitive examinations at age 11 (the 11-plus). Grammar schools provided advanced instruction in liberal arts for students until age 16, preparing them for university and/or professional careers. The third tier of the tripartite system, the junior technical schools, never educated more than 4 percent of schoolchildren; their entry age of 13 was at odds with other schools that admitted at 11, and psychologists cast doubt whether the skill aptitudes for which the schools catered were detectable. With students separated into different classes of schools around age 11, this system was clearly organized on the basis of early selection, though it was students' family wealth or social standing (not past academic performance or perceived intellectual ability) that determined whether

they would ascend to the academic track. Secondary schools were dominated by the middle classes, while the overwhelming majority of working-class students completed their entire education in a single elementary school before leaving at the minimum leaving age to enter the labor market. Many grammar schools, financed directly by the central government and hence independent of the LEA, took a proportion of local, very bright LEA scholarship children. Academically weak offspring of well-to-do parents who failed the 11-plus could pay a fee and buy their way out of secondary modern into grammar schools inappropriate for them. The Fisher Education Act of 1918 raised the school-leaving age to 14.

The Second World War spurred the 1944 Education Act that garnered wide public support. It raised the school-leaving age to 15 while abrogating "all-age" schools, although 20 more years were necessary to carry it through. The Board of Education was upgraded to a ministry, and religious schools (Anglican and Catholics) could secede from LEAs and opt for a "maintained" status, receiving direct grants from central government. Education remained a local, proudly defended terrain. LEAs needed to draw up plans, so the ministry could no longer dictate what should be taught. The ministry could affect the curriculum by means of advice and guidance via circulars and mandate nationwide examinations, but the minister could not lay it down.

From the early 1950s onwards, the tripartite system was under attack as more and more educational sociologists and psychologists, think tanks, and research institutions proclaimed the 11-plus had misallocated children. Such allegations struck a chord with Anthony Crosland, a Labor MP and Oxford professor who would later become secretary of state for education and science under Harold Wilson's governments in the mid-1960s. Crosland envisaged a truly egalitarian system to level British society by providing all young people equal access to life chances.

LEAs had leeway to espouse any form of schooling, so comprehensives had been erected already in the mid-1950s, but Crosland's circular 10/65 entreated LEAs to present plans to abolish the 11-plus and move to some form of comprehensive organization. Within a few years, the number of children in comprehensives soared, overtaking those in grammar schools in 1969, and those in secondary modern schools in 1972. Five years after Crosland, Thatcher's circular 10/70 withdrew Crosland's, telling LEAs they could keep their grammar schools and even open new ones should they wish. Since the tide had already been flowing, Margaret Thatcher was to go down as the secretary of state for education and science (1970–1974) who closed more grammar schools than any other while the number of comprehensives rose more rapidly under her than at any time before or since (Timmins, 1996, p. 298).

In 1974, the incoming Labor government set up the Assessment of Performance Unit (APU) with a remit to produce up-to-date national measures of school performance, and a unit to study ways to improve the attainments of children from deprived backgrounds. In 1976, the same government withdrew financial support from 151 grammar schools, abrogating those grant-maintained schools; middle-class fee payers were forced to bear the full costs of their children's schooling, unsupported by the taxpayer. Local parents with modest pecuniary means no longer had an alternative to the comprehensive.

In 1980, the new Conservative government reversed the Labor's policy and the "assisted places scheme" was enacted through the 1980 Education Act. Selected independent schools could offer places to children and charge reduced fees depending on their parents' income. The government might recoup the schools for the difference. The scheme had been launched in September 1981, offering 5,300 places and later on 35,000 places where it remained until it was scrapped by the New Labor in 1998. Nevertheless, the number of "assisted places" was barely a drop in the ocean compared to nearly 4 million children in secondary schools.

The most notable development since Butler's 1944 Education Act was by far Baker's Education Reform Act of 1988 (ERA), which incorporated 238 clauses, taking 415 new powers to the center (Timmins, 1996, p. 442). For more than a decade, scholars and politicians advocated a national curriculum while pitting against teachers and LEAs. The ERA tipped the scale in favor of a national curriculum that turned Britain from one of the few industrialized countries without some form of national curriculum into one with the most detailed and prescriptive curriculum of them all (Timmins, 1996, p. 443). The ERA had many provisions pertaining to schools as well as to higher education institutions; its main elements were (Glennerster, 1998, p. 34):

- A national curriculum was to be inaugurated, with a series of levels or attainment targets to be achieved by given ages, and common assessments set for children nationwide at stages 7, 11, 14 and 16—the statutory school-leaving age.
- Provision was made for schools to opt out of local authority control and to be funded directly from central government.
- Local authority secondary schools, larger primary schools, and later virtually all schools had to have devolved budgets. The local authority was not able to retain more than 15 percent of the money set aside for schools in its own hands for centrally provided services. The rest had to be

devolved to schools and managed by the governors who would include parents, local community representatives, and some teachers.

- Universities were to be funded by a funding council that would take control over their affairs. Tenure for newly appointed academic staff was abolished.
- Polytechnics moved from local authority control to become independent institutions under a separate polytechnic funding council.
- The Inner London Education Authority was abolished, shifting powers to the local boroughs (Glennerster, 1998).

Despite measures to render the opting-out option more favorable, by August 1994, five years into the vociferous launch, the number of grant-maintained schools amounted to barely 1,000, equaling less than 5 percent of all schools. Among secondary schools, 16 percent or one in six of both schools and pupils had been grant maintained (Timmins, 1996, p. 446); halfway through 1996, 100 additional schools opted out. Open enrollment obliged schools to accept students to a calculated number and allow parental choice. Although most schools did not opt out of their LEA, Local Management of Schools (LMS) whereby 85 percent of funds were delegated directly to schools diminished LEA's role and decentralized. Power shifted to central government, schools, and parents, rendering local government the major loser (Sanderson, 1999, p. 139).

Old controversies such as religion and selection reentered the fray when more and more Muslim groups wished to erect their own grant-maintained schools. In 1993, a grant-maintained school in Cumbria became the first grant-maintained comprehensive to go fully selective, joining 150 surviving grammars. Piecemeal, a string of schools around the country moved to select between 30 and 100 percent of their pupils, fearful that if they did not they would lose brighter pupils to rivals (Timmins, 1996, p. 512).

The Education Act of 1992 instituted regular inspections of schools and put pressure on local authorities to maintain standards by threatening to take over failing schools through special government Education Associations. Her Majesty Inspectorate (HMI) for Education was renamed the Office for Standards in Education (OFSTED) and given extra prerogatives to become the locus of a rigorous testing regime with results published in the form of league tables (Jones, 2000, p. 179).

Teachers complained that league tables were statistically crude, and the criteria used even cruder; in 1997, the New Labor government withdrew its past opposition and endorsed league tables regardless. In what *The Times* (1998) dubbed "the annual festival of middle-class prejudices," some

schools were extolled while others were "named and shamed" for low rates of literacy and numeracy coupled with high rates of truancy. League tables have been accused of ignoring the very different life chances of children in different areas of Britain, since it has been unlikely that "children in areas with Britain's worst social problems would score as well as children from 'glorious places where people work hard, live clean and pass their exams.'" (Jones, 2000, pp. 203–204)

In 1993, the teachers cowed by the government's frantic reforms back-lashed, boycotting spectacularly what was meant to be the first round of testing for 14-year-olds. A new School Curriculum and Assessment Authority over-hauled the whole curriculum and testing regime. The curriculum was simplified and the testing regime was to follow suit. The new meager curriculum left room for extras, allowing vocational courses for the less academic back into schools. In its 18-year reign (1979–1997), the Conservative government undertook to create a quasi market in education (akin to similar measures it took by reorganizing health, community, and other local authorities' services), establishing a voucher system for all intents and purposes without the actual paper. Public funding was supposed to follow the "client" (be it a patient or a pupil) and target chiefly those from modest backgrounds. For the first time in its history, the British education system issued an elaborate and prescriptive mandatory curriculum, not unlike its continental competitors, the most prominent of which are France and Germany. Prima facie, it seems the Conservatives failed to foster social mobility; a recent study reported that intergenerational social mobility had fallen markedly in the UK over time. There was less mobility for the cohort of people born in 1970 compared with the cohort born in 1958. Family income has heavily borne on educational attainment: Students from more affluent families were more likely to stay in education, and hence benefited disproportionately from the expansion of higher education since the late 1980s.

With respect to international standards, the OECD's Program for International Student Assessment (PISA) study of 2000 concluded that English students performed poorly in math, ranking in the middle of an ordering of advanced countries. Yet English schools did well in science results, as English children outperformed those in most European and other English-speaking countries (Glennerster, 1998, p. 68). The central principle of tracking attainments over time vis-à-vis an external standard came to be widely accepted (Glennerster, 1998, p. 31).

Although Britain has a functioning system of school choice in place, choice has been optional only for those who can afford it; even within the state sector some parents can pay for choice with their mortgages by moving

to catchment areas with good schools in the suburbs. Children from affluent households can also attend fee-paying schools in the private sector, so the poorest in society get the worst deal. In local authorities, the prevailing surplus places policy, whereby state schools cannot expand and no new schools may be established so long as there are unfilled places at state schools in the area, reduces pressures to compete, so children from disadvantaged families must attend one of the local state schools even if none of them are good. From the 1970s on, recurring projects were geared to those populations where poverty, unemployment, poor skills and education, and decay abound, but problems of deprivation and lack of social mobility have been highly resistant to solution (Jones, 2000, p. 204).

Social Security

One can argue, perhaps, that social security (which really is only economic security) is the invention of twentieth century governments. Piecemeal social security legislation emerged in the second half of the nineteenth century, and from the 1920s on this was incorporated in encompassing social security systems. These paid benefits to retirees, the physically and/or mentally disabled, and the unemployed, to name three major categories of people. In some countries the social security system was extensive and expansive (for instance, in Sweden); in others less so (for instance, the United States). However different the benefit levels may be between countries, since the 1970s social security systems have been in reform in response to increased life expectancy, the retirement of baby boomers, and a sharp increase in the number of senior citizens. Also, where social security was state based and owned (as for instance with pension systems), governments attempted to develop privately managed alternatives.

Chile: Social Security Gone Outright Private

Launching its first national insurance fund in 1924, Chile spearheaded social security in Latin America (information in this section from Arenas de Mesa and Bertranou, 1997; Callund, 1999; Williamson, 2001; Godoy-Arcaya and Valdés-Prieto, 1997; Barr, 2006; Arenas de Mesa and Mesa-Lago, 2006; Mesa-Lago, 2009; Fajnzylber and Robalino, 2012; Barrientos, 1998; Rofman and others, 2008). The plan had initially covered only a few occupational categories and a fraction of the population, but coverage increased piecemeal along the years, encompassing three-quarters of the population by the

early 1970s. Pensions were only moderately progressive, and excessive costs led to fiscal deficit.

The 1942 Beveridge Report embodied the zeitgeist of an epoch that witnessed ubiquitous welfare legislation. Following the post-World War II financial disarray, Chile restructured its pension system in 1952, introducing a pay-as-you-go (PAYG) plan under state management. PAYG schemes pay pensions out of current income, whereas fully funded plans pay pensions out of funds built over the years from members' contributions. Most state pension plans are PAYG. Conversely, private plans are funded (though not always adequately).

As the 1970s ebbed away, fertility rates dropped. In the wake of Chile's economic downturn, decisive reform was much needed to develop a productive economy at a time when everybody had a job but few were actively employed to do anything. By the mid-1970s, the Chilean plan could no longer function without huge subsidies out of government revenues, because the system was not generating sufficient revenues to cover pension obligations, even with payroll tax rates that could reach 25 percent. The pension plan was supposed to replace 70 percent of a manual worker's final wage, but by the late 1970s, the replacement rate was closer to 20 percent despite massive government subsidies. There were also serious problems of noncompliance, due in part to very high payroll tax rates. Moreover, the public pension system was fragmented into 35 funds or plans, most of which were financially imbalanced and with significant differences in coverage, entitlement conditions, contributions, and financial status.

Pensions were privatized under a more general effort by General Augusto Pinochet to marketize the Chilean economy. The authoritarian Pinochet regime was able to impose this policy shift despite opposition from a number of groups, including public sector workers, teachers, health workers, academic experts, and union members. In 1979, after the military government had unified the public pension funds, it also raised and equalized the retirement age and level of contributions. In 1980, the public system was closed aside from plans pertaining to the armed forces; in May 1981, a new private system took effect. Chile became the first nation in the world to shift from a public PAYG defined-benefit (DB) pension system to a privatized, defined-contribution (DC) alternative based on individual accounts, market capitalization, and private management.

A short period was given for those insured to choose whether to stay under the regime of the public system or move to the private one. Individuals who switched to the new system were not allowed to reverse

their decision and return to their previous plan. Since December 1982, the new system has been the only government-sponsored pension plan available to new entrants into the labor market, so they enrolled in it automatically. The Chilean Personal Pension System has been compulsory for wage earners and salaried employees and optional for the self employed. Employers' contributions were eliminated, and workers deposited 10 percent of their income (the defined contribution) in individual accounts managed by private for-profit corporations set up for this sole purpose.

Workers paid commissions to the AFPs (*Administradoras de Fondo de Pensiones*) for the administration of the old-age program, part of which was transferred to private insurance companies to cover risks associated with disability and survivors (the insured person's dependents). Contributions bought units in the AFP's single-pension fund that invested in a range of permitted assets. The pension fund could only be used to arrange pension benefits at retirement; workers could use their accumulated fund to either purchase a life annuity from an insurance company or agree on a scheduled withdrawal program with their AFP (or a combination thereof).

Chile's move resonated in many countries. The "multi-pillar model" with a mandatory funded component was the flagship of economic measures advocated by the World Bank (WB). Many countries have followed Chile's example and added mandatory contributions to private pension funds alongside contributions to the state's PAYG system, although the Chilean system was hardly flawless.

Many, for instance, pointed to built-in bias against women due to their low-paid occupations and intermittent job record. Under the Chilean personal pension system, workers assumed the investment risk in full, but the government in turn provided a minimum pension guarantee. The level of the minimum pension was set by the government biannually. In the event a worker's accumulated fund had been insufficient to generate a pension benefit at least equal to the minimum pension level, the government would have supplemented the fund to secure it. Affiliates would have qualified for a minimum pension after 20 years of contributions, which could include up to three years of inactivity due to unemployment. In addition to retirement pensions, workers who had paid additional contributions were entitled to disability and survivor pension benefits. Survivor pension benefits were available to female spouses of participants, but not to male spouses. Workers with significant inactivity spells and female employees with participating spouses had very little incentive to join a pension fund. Rigid legislation prevented pension fund administrators from making changes in terms of administration and marketing expenses.

Commissions charged by the AFPs have been deducted from wages, paid by the insured, set freely by the AFPs, and have been of two types: a fixed sum and a variable percentage. Fixed commissions have had regressive effects because they have been proportionally higher for low-income employees (reducing their net deposits in individual accounts, capital returns, and pension levels) than for those with high income. Half the membership in 1997 switched between AFPs after being persuaded by agents hungry for commissions who went so far as to offer "cash back" to people who agreed to switch funds. Administrative costs engendered huge public deficits that exceeded those of the old public system, but when it came to choosing the most convenient AFP, affiliates had received sophisticated and misleading information (4.7 percent of GDP in the 1990s).

In 1999, new regulations thwarted unnecessary movements between AFPs by scaling down fees pocketed by salespersons. Overconcentration began to plague the system. The number of AFPs that had been 12 prior to privatization peaked at 21 in 1994 after allowing trade unions to organize their own AFPs. Since 1995, AFPs had been closing down and merging, so by 2004 their number fell off to only six—half the initial number. Further concentration has been likely because the biggest AFPs have been controlled by foreign corporations that tend to take over or annex competitors. Extraordinary profits over assets alongside lack of entry over a long period attested to insufficient price competition.

Pensions have been financed by accumulated funds, which meant that benefits have been nondefined (ND) and therefore uncertain. Benefits were contingent upon five factors: (a) the amount of contributions deposited in the individual account during the working life of the insured; (b) the capital returns on the investment of the fund in such an account; (c) the life expectancy of the old-age pensioner; (d) his or her gender; and (e) the number, age, and life expectancy of the insured's dependents.

Until 2008, the government offered two publicly funded programs for individuals with low pensions or no pensions at all: the minimum pension guarantee (MPG) and assistance pensions (*pensiones asistenciales*, PASIS). Those who had contributed for at least 20 years (including contributions to the old system) were entitled to an MPG—a fixed pension paid by the state when the individual balance was exhausted or when the annuity was below the minimum pension level. PASIS benefits were paid to those over age 65 with no pensions or other forms of income. Unlike regular pensions, minimum pensions were not indexed against inflation, but rather directly adjusted by government.

The Chilean system was amended further as it ripened toward its third decade. In March 2006, Michelle Bachelet, the elected president,

commissioned an experts committee to draw a report. Two years later, the congress approved a comprehensive bill representing the most significant reorganization since the original 1980 reform. The 2008 reform replaced the MPG and the PASIS programs with a single plan securing a basic pension to all individuals in the 60 percent less affluent fraction of the population regardless of their contribution history. This new program has provided old-age and disability subsidies drawing on the state's general revenues. This New Solidarity Pillar (NSP) supplanting the old means-tested programs has bifurcated into an old-age Basic Solidarity Pension (PBS) paid to individuals with no contributions once they reach 65, and a Pension Solidarity Complement (APS) paid to individuals who contributed but would have received a pension below a certain threshold.

To resolve the problem of women's lower contribution density because of child rearing, the Chilean re-reform has granted a universal maternity voucher to all mothers (independent of their socioeconomic position) for each live-born child, equivalent to 18 months of contributions based on minimum salaries. The voucher is to be deposited on the date of the child's birth from which point it receives an annual rate of return, cashable when the woman turns 65, increasing the level of her pension. A further attempt to alleviate gender inequalities in the pension system levied a single charge on both men and women for disability and survival insurance. Owing to higher average salaries, men have paid higher premiums. The premiums paid by women have been deposited in individual accounts and invested, and that surplus gave invalid spouses of insured women rights to a pension that they had not possessed before. In case of conjugal separation, the funds accumulated during the marriage might be divided between the two spouses to a maximum of 50 percent each. The new Chilean law also withdrew minimum pensions from AFPs, eliminated the superintendence overseeing them, and erected instead a single unified pension superintendence to supervise both the public and the private systems.

To stimulate competition and reduce administrative costs, the Chilean law stipulated the following measures: (a) biannual affiliate bidding, so the AFP that offers the lowest commission wins the affiliation of the 200,000 people who enter the labor market annually (the reduced commission also has to be applied to old affiliates); (b) elimination of fixed-sum commissions that had regressive effects; and (c) authorizing banks to manage individual accounts in competition with AFPs. In order to goad workers and pensioners into participation, the Chilean law created a commission composed of five representatives, one from each of the following categories: workers, pensioners, AFP, insured remaining in the public system, and

academia. Representatives have monitored performance in light of the reform goals and contrived strategies for members' education, diffusion of information, and communication.

Since the early 1980s, pension reform was only one element in a platform of all-encompassing socioeconomic reform that has managed to propel a productive economy with productive employment and a pension system that does not discourage productive activity by people when they get older.

Japan: A Double-Edged Sword—Super-Aged, Poorly Funded

The Japanese case represents a nearly unparalleled cause for concern due to the intersection of three demographic trends: a sharply declining birth rate, a baby boom generation approaching retirement, and steady longevity increases during the postwar era. Japan already has the oldest population in the world: The proportion of those older than age 65 was more than 25 percent in 2005 and will have risen to more than 40 percent by 2050 (information in this section from Takayama, 2001, 2009b; McLellan, 2004; Kang and Lee, 2009; Shinkawa, 2005; Huh and McLellan, 2006). The emergent intergenerational gap or disparity between lifetime contributions and benefits has begotten disequilibrium between contribution inflows and benefit outflows that has entailed elevated pension expenditures or reduced benefits.

From the outset, the Japanese system was institutionally fragmented, segregated, and overly diversified. The pension system imposed dual economic structures such as employment condition and income along with differences of regions and classes; plans have also varied in terms of financial stability and adequacy of benefits. This deep-seated fragmentation caused fiscal tightness in specific pension plans already in the early 1980s; as the population continued to age, it became paramount to overhaul the pension system.

Japan's occupationally divided pension system has its origin in public sector pensions. Naval, army, and civil service pension plans had been introduced at the initial stage of nation-state building between 1875 and 1894 and were unified in 1923. The government was reluctant to introduce a public pension for private sector employees, since the government shared with employers the concern that it would contribute to unionization across firm lines and reinforce unity. Retirement payments in lieu of pensions were commonplace amid large firms in the 1920s.

World War II witnessed the advent of the first pension in Japan as part of a social insurance system. The pension insurance law of 1942 was supposed to accommodate the costs of war and to raise productivity. In 1944 it was

supplanted by the Employee Pension Insurance plan (EPI). When the economy got on the right track in the mid-1950s, welfare bureaucrats influenced by the Beveridge Report reactivated the EPI as an umbrella plan providing employees in the private sector with a major source of income in retirement. The Japan Employers' Association (JEA) insisted that employers be allowed to opt out of the earnings-related component of EPI. In 1966, the government yielded and launched the Employees' Pension Fund (EPF), which vested companies with the rights to administer and invest the income-related portion of the EPI transferred from the government to the company and referred to as "contract-out." With this piece of legislation, Japan's pension system of commingled public and private benefits was born. The system of "pension for all" was completed by imposing membership in the National Pension Insurance (NPI) on those uncovered by employees' plans except housewives.

A grand-scale reform in 1985 introduced the Basic Pension (BP) to tie benefits to contribution. The BP constitutes the first tier of public pension that covers all citizens aged 20 and over; it entails 40 years of contributions to guarantee a full benefit. It is pay-as-you-go (PAYG) and subsidized substantially by tax revenues. All administrative costs and a third of benefits had been paid out of tax revenues in 2004; beginning with fiscal 2009 the government's share bloated, subsidizing half of the total cost of the flat-rate basic benefit but with no subsidy for the earnings-related part.

The BP has comprised three different types of insured. First-type insured have been members of the NPI covering farmers, the self employed, unemployed, and students. The second type has consisted of employees in both the public and private sectors aside from those who worked for companies with fewer than five employees. The third type has included spouses of second-type insured whose yearly earnings were lower than 1.3 million yen. First-type insured were expected to register themselves and contribute the fixed amount of premiums of their own accord. Over 20 percent of first-type insured have been exempted partially or entirely from contribution due to their low income. Even though the BP has been mandatory, approximately 600,000 potential first-type insured have not joined the program, and more than 3 million first-type insured have been in arrears. Second-type insured could not have failed to pay contributions because their contributions have been automatically deducted from their paychecks. They have paid 13.58 percent of monthly salaries and premiums (half paid by employers), but usually have been oblivious of how much they pay specifically to the BP, because their entire contributions have gone to their second-tier occupational plans from which a certain portion has

been transferred to the BP. Third-type insured have been exempted from contributing. The major aim of the BP was to rescue the NPI from deficits. No efforts were made to coordinate various plans, which might have triggered resistance to the integration among employees.

The second tier has provided employees with moderate earnings-related pensions. It has subsumed the EPI that provided for private sector employees and Mutual Pension Plans (MPPs) for public and quasi-public servants (personnel in private schools and quasi-public corporations such as cooperatives in agriculture, forestry, and fishery). The central government and local governments have had their own independent plans. The second-tier plans were PAYG, but their administrative costs have been financed out of tax revenues, not unlike the BP. Employees were not allowed to claim exemption due to their low incomes, and no subsidies have been available. Firms were allowed to opt out of the EPI and forge their own funds (EPFs), but despite their private management, EPFs have been regulated and supervised by the government, since they have had a substitute for the EPI in addition to a purely company-specific pension. An EPF is an independent juridical entity, which a sponsor company/group of companies cannot dissolve of its own accord. In case investment returns have been lower than the officially required interest rate, sponsor companies have had to make up the difference.

In the wake of the decade-long recession of the 1990s, a pension bill restructured the social security system in order to fine-tune it in March 2000 in light of changing socioeconomic circumstances. Pension benefits were to be reduced by 20 percent by 2025; earnings-related benefits were to be reduced by 5 percent; flat-rate, basic benefits and earnings-related benefits that had once been tied to wages and updated every five years were to be tied to the consumer price index after the age of 65.

A defined-contribution (DC) plan was introduced from October 2001, followed by the Defined Benefit (DB) Occupational Pension Act that took effect on April 1, 2002. Contrary to expectations, DC plans in Japan have had at best a lukewarm response. Unlike similar endeavors around the world (including the United States), the DC act placed a very low cap on contributions, which precluded many companies from fully converting existing plans; it also stipulated against early withdrawals by employees before they reached the age of 60 and did not permit employee contributions, which kept assets small and locked in. The cash balance (CB), a hybrid plan, has taken precedence; such plans exemplify a shared burden or compromise typical of Japan's labor relations while combining what many consider the best features of DC and DB plans.

Global changes in international accounting standards in 2000 induced new accounting standards in the Japanese corporate pensions industry. When corporate pensions formally developed in Japan during the postwar period, tax rules did not allow companies to expense current contributions or prefunding. As a result, companies found it more convenient to simply not prefund pensions. International trends and overall globalization of accounting standards increased the pressure on Japan to adopt stringent accounting and disclosure requirements. Writing down a pension liability on the balance sheet and disclosing the full extent of pension assets and liabilities in the footnotes made transparent for the first time the status and questionable ability of corporate pensions to assume a stronger role in retirement savings. Dramatic demographic pressures put the PAYG system in a precarious position: how to provide benefits to an expanding base of retirees while the contribution base of current workers is shrinking. The public pension aspect enhances even further the pressure on corporate pensions to fulfill a greater role in the postretirement equation for Japan.

Japan's record keeping has been deficient. Due to human errors made by enrollees, their employers, and agencies, there have been around 50 million "floating" records of social security pensions, that is, records that have not been integrated into the unified pension numbers. Before January 1997, pension identification numbers were issued to each participant on a regional basis irrespective of pension program; upon migration to another region, company, or pension plan, and following marriage or divorce, these numbers altered. Since there was no adding-up requirement of covered years among different pension plans, many Japanese were likely to have two or more pension identification numbers before retirement. It was only in January 1997 that the unified pension identification number was introduced for all eligible persons in Japan. Pending unification, the Social Insurance Agency (SIA) that manages social insurance including pension found that there were some 300 million identification numbers for pensions, whereas eligible persons totaled around 100 million at that time. When the SIA sent those persons postcards entreating them to list all pension numbers they had in the past, more than 90 percent failed to comply, setting the stage for a national scandal that cost Abe's administration its reelection to the upper house in July 2007.

Japan has not managed to guarantee the solvency of its pension system yet; endless reform and the "floating" records scandal have eroded credibility legitimacy for the long term, and Japanese governments do not seem to be able to turn the tide. The dropout rate has increased from 35 percent in 1992 to around 54 percent by March 2007 of first-type persons

(independent workers, atypical workers, the self employed, and persons with no occupation) who have dropped out from the basic level of protection because of exemption, delinquent accounts, or purposefully shunning the program. Those who have dropped or opted out will have received a smaller pension or none at all by the time they get old, so they are likely to rely on means-tested public assistance. More and more atypical employees as well as part timers are not covered under any earnings-related plan. In April 2007, 1.6 percent of people age 65 and older received no social security pension mainly due to insufficient years of contribution. Coverage is projected to shrink further alongside persistent drift out of social security programs due to eroded trust.

Poland: Farewell Redistribution, Hello Funded Defined Contribution

Pension systems in Western Europe have raised retirement age and gradually equalized the retirement age of men and women, whereas Central and Eastern European (CEE) countries and former Soviet republics were bent on more radical reforms (information in this section from Wiktorow, 2007; Fultz, 2004; Hausner, 2002; Chlon-Dominczak, 2009; Chlon-Dominczak and Strzelecki, 2010; Zajicek and others, 2007; Chlon, 2000; Jarrett, 2011; OECD, 2008). In the late 1990s, Hungary and Poland were the first CEE countries to radically restructure pensions, replacing part of their public PAYG pension plans with commercially managed individual savings accounts. Entrenched vested interests of certain occupational branch groups (mainly in mining and heavy industry), which had held sway in socialist systems, were the main problem inherited from that past that rendered those PAYG systems more susceptible to political pressures. Each country developed its own structural compromise to reduce labor market distortions while providing adequate income in a way that reflects its own unique social history, economic situation, and political preferences.

The pension system in Poland dates back to the interwar period. It became a full-fledged universal PAYG system in the 1950s. In 1989, the first postcommunist government opted for "shock therapy" in the form of rapid market reforms instead of gradual transition. Aside from privatizing and closing inefficient state-owned enterprises while eliminating their "easy" credit, reformers advocated free prices, drastic cuts in subsidies, wage controls, and a balanced budget. Such measures escalated unemployment and begot a short but deep recession and several years of hyperinflation. Pensions were not uprated until the 1980s when inflation rapidly eroded purchasing power. In 1982, legislation adjusted pensions in accord with the

rising cost of living. Those who had already retired received index-linked benefits. The pension rate was calculated at 100 percent of a worker's base salary up to the first 3,000 zlotych, and then at 55 percent of the remaining amount. The minimum pension could not be lower than 90 percent of the lowest mean wage.

The 1991 Pension Re-evaluation Act had automatically uprated pensions in line with earnings and introduced earnings tests to alleviate labor market problems. Retirees could earn up to 60 percent of the average national wage without penalty. Earnings between 60 percent and 120 percent resulted in a loss of the benefit amount in excess of 60 percent; all benefits were retracted if a retiree earned 120 percent or more. The 1991 act also increased gradually the number of years used to establish the salary base for calculating pensions. Since the average wage tends to be higher if fewer years can be selected, this provision decreased benefit levels across cohorts of retirees. Indexation was not favorable for pensioners in the early 1990s because prices increased faster than wages. However, real wages grew after 1993, and correspondingly pension spending spiked up. After the subsidy to the social insurance fund from general revenues reached 5.7 percent of GDP, the government cut down on pensionable income from 100 percent to 91 percent of actual pay. From 1995 onwards benefits were indexed to prices.

Regardless of government efforts, some groups were able to preserve or even add new occupational privileges. For instance, in 1995 the average monthly pension for both the military and the police was more than double the pension for the general population ($347 and $291 respectively, compared to $139). In fact, in 1995 the average salary was 32 percent lower than the average military pension. Spending spiked due to early retirement of too many, as people subject to group layoffs could retire regardless of age if they fulfilled the contribution criterion (40 years for men and 35 years for women). Workers in reorganized sectors were also offered early retirement. Almost a quarter of the workforce was covered by some kind of early retirement privilege, which seemed a convenient way to reduce labor market pressures. Access to disability benefits was relatively easy. Despite policies to countervail the labor market mismatch and facilitate restructuring following transition, in the second half of the 1990s unemployment spiked, worsening labor market conditions.

A watershed moment still lay ahead of the Polish pension system after the Swedish model had inspired a reform set in operation in 1999. The mandatory pension system was based on two components: national and funded defined contribution (NDC and FDC, respectively). Persons born before 1948 were not covered by the reform and remained in the old

defined-benefit pension plan, and their old-age pension contributions (19.52 percent of their wage) were transferred to the Social Insurance Fund (ZUS). People born between January 1, 1949, and December 31, 1968, had an option to split their contributions between NDC and FDC accounts or have only an NDC account (that is, their enrollment with second capital-pillar pension funds was voluntary). In that case, all pension rights that had been accrued prior to the enactment of the reform were recalculated into the initial capital and credited to the NDC account, but the decision whether to split their contributions between the two pillars or remain in the public PAYG system alone was irrevocable. The new NDC system whereby benefits reflected each individual's own contributions in a more nearly linear way revamped the public pension system. Future pensioners are supposed to receive benefits they have "paid for," so redistribution toward low-income earners is eliminated, and benefits diminish automatically in response to growing average life expectancy.

Approximately 70 percent of those who were allowed to choose opted for membership in the pension funds under the second capital pillar. Contributions of people who had remained in the first pillar (19.52 percent) were transferred to the Social Insurance Fund. People who decided to become members of pension funds under the second pillar transferred 12.2 percent of their wages to the Social Insurance Fund, and another 7.3 percent went to a selected open-ended pension fund. People born after 1969 have been mandatorily covered by the double-pillar pension. Only the state's budget could bridge ZUS deficits that stemmed from shifting contributions to the second pillar. Pensions have been calculated based on accumulated assets in both accounts and unisex life expectancy at retirement age. The pension formula was not progressive; namely, retirees could expect to receive the same proportion of their earnings at retirement, regardless of their wage.

The 1999 reform has cast a pension system with preponderant gender inequalities. Differences in pension levels derive not only from higher life expectancy for females but also from disparate wage levels, length of work, and retirement age (60 for women versus 65 for men). Women subsequently face higher risk of low pension benefits. The minimum old-age pension entailed retiring under both pillars simultaneously. Only persons who had paid contributions for at least 20 years for women and 25 years for men were eligible for the minimum pension. In case the total old-age pension payable under the first and second pillars was lower than the statutory minimum, it was raised to the minimum old-age pension financed from the state budget.

The replacement rate for covered workers diminished by 37 percent according to OECD calculations, amounting to around 50 percent in total with about half of that from the first pillar and half from the defined-contribution pension funds (using historical average data on investment returns). The government had capped contributions at 2.5 times the average wage, which lowered government revenues in the short term by an estimated 0.4 percent of GDP. Defined contributions tied benefits to earnings rather than occupation and dwindled previous occupational inequities embedded in the communist system in an attempt to reduce early retirement and prolong working life. Success has been only halfway due to a transition rule that enabled persons who had qualified for all retirement rights before the end of 2008 to retire under the old system.

Since the end of the 1990s, the gap between the employment of older workers in Poland and the EU countries has been widening because labor market participation of persons aged 50 and older remained one of the lowest in the EU. People covered by the new pension system have only started to retire in 2009. Recent legislation has precluded most early retirement options. "Bridging pensions" had been granted in some instances based on a medically verified list, but in 2009 policy makers managed to exclude occupations and shrink bridge pensions. Pensioners were dismayed by the new layer of management and administration interposed between the pensioner and his/her savings in the "open pension funds." The government issued bonds to finance a deficit, a large part of which was attributable to transfers to the OFEs (the private open-ended pension funds). Despite the radical cut in replacement rates since 1999, the system was still not fully financed by contributions. The financial imbalance was supposed to be resolved by devoting the proceeds of privatization to the pension system, but sales had generated fewer revenues than the government's transfers to the OFEs. The government could no longer afford considerable transfers to the OFEs in the context where it had to consolidate public finances to avoid government debt reaching the 55 percent of GDP threshold that required automatic cutbacks. When the burden on public finances approximated the ceilings for government debt of 55 and 60 percent of GDP stipulated by the law and the constitution respectively, the government was forced to take action.

The epilogue to the 1999 reform has arrived rather hastily, when the parliament had quickly passed a special bill that took effect on May 1, 2011. The reform package retrenched contributions to the OFEs from 7.3 percent to 2.3 percent of earnings (with a recovery to 3.5 percent from 2013 to 2017), with that amount diverted to the Social Insurance Fund (ZUS). Tax

cuts have been introduced for optional third-pillar retirement savings. Before the partial policy reversal, official estimates pointed to a cumulative cost of 94 percent of GDP by 2060. The government's proposed shift of contributions from the OFEs to the first pillar was supposed to reduce this alarming figure from 94 percent to 44 percent and cut the value of pensions, albeit the value of the public component was projected to mount. Gross replacement rates in relation to final salary would decrease for cohorts born more recently than for today's retirees due to demographic aging. The private pension market did not stand still: At the outset of the reform, there were 21 pension funds. By 2007 their number shrank to 15, and further mergers and acquisitions are pending.

Sweden: Transforming Corporatism and Remodeling Labor Market Policies

From 1890 to 1920, labor and social movements pursued democratization as a joint project with liberal elites who had dissented from an antidemocratic conservative regime. Those movements had erected municipal employment offices to establish a strong national presence that forged strong links between workplaces, local organizations, cooperatives, and neighborhood organizations (information in this section from Calmfors and others, 2002, 2004; Vandenberg and Hundt, 2012; Forslund and Krueger, 1997, 2010; Lindvall and Sebring, 2005; Anthonsen and others, 2011). During the interwar depression the government organized relief works and special youth jobs. The foundations of modern labor market policy were laid in 1948, when the National Labor Market Board was instituted.

Gösta Rehn and Rudolf Meidner, a couple of trade union economists, laid out the principles of the Swedish labor market policy in the late 1940s and the early 1950s, devising labor market retraining and other measures to enhance mobility so that unemployed in low-productivity sectors could migrate to high-productivity sectors, relieving labor shortages there. An active labor market policy was also presumed to be conducive to low inflation, full employment, and wage compression. Postwar concerns regarding labor mobility shifted to all types of unemployment between 1960 and 1990. Many are struck by Sweden's breadth and generosity of labor market programs designed to limit the adverse effects of unemployment and expand employment. These programs include extensive job training, public sector relief work, recruitment subsidies, youth programs, mobility bonuses, and unemployment benefits. Unemployment insurance (UI) benefits are said to be passive labor market policies, whereas labor market programs are considered active labor market policies. This distinction

seems to be based on a notion that UI benefits are paid as a compensation for not working. For Sweden, this is a misleading distinction owing to a set of rules designed to ascertain that the unemployed person is available for work and is actively searching for a job in different ways. The Public Employment Service (PES) is the spider in this web.

Active labor market policies refer to supply-side measures intended to assist the unemployed to find a paid job. From the late 1950s on, spending on active labor market policy such as labor market training has been exceptionally high in Sweden. Unlike many other countries that have relied on cash transfers to the unemployed, Sweden has always pursued active policies designed to eliminate open unemployment and reintegrate the unemployed. Lenient labor market policies reflect a long-lasting corporatist tradition in Sweden. When it comes to state and society, corporatism conceives of a state that actively intervenes to recognize, license, or create particular groups with organized capacity to represent given interests so long as they select moderate leaders to articulate their demands. In corporatist systems, trade unions and employer organizations are invited to develop and implement public policy in tandem with the state and other interest organizations. For the past 60 years, Sweden has occupied an antipode of a spectrum of corporatism.

Up to 1974, unemployment compensation had been provided only by so-called certified UI funds run by trade unions at the industry level but mainly tax financed; a supplementary compensation system (*kontant arbets-marknadsstod*, or KAS) was forged in 1974, designed mostly for new entrants to the labor market who were not usually members of any UI fund. In 1990, coverage was slightly less than 80 percent of the labor force. UI fund members were entitled to compensation for 300 days (450 days for workers over age 55), whereas cash benefit assistance used to run for 150 days (300 days for those over age 55, but 450 days for those over age 60). Compensation rates in UI funds had been fixed within limits by the government; maximum levels had been set at 90 percent of the recipient's normal income prior to unemployment; in July 1993 it was cut back to 80 percent. When funds were run by trade unions at the industry level, coverage roughly coincided with wage-bargaining units; state grants to the UI funds had been designed so that the marginal cost of extra unemployment among fund members was zero. A number of criteria, many of which were common to the UI funds and KAS, had to be met in order for a person to be entitled to compensation. The two most prominent conditions were that recipients actively search for a job at a public employment office, and that an offer of "suitable" work had to be accepted. After unemployment benefits had run out, individuals were eligible for social security that offered significantly less

generous compensation. In order to receive compensation from a UI fund, a claimant must have paid membership fees to the UI fund for at least 12 months and must have been working for at least 75 days distributed over at least four months during the 12 months preceding the last unemployment spell. Participation in relief work as well as in labor market retraining programs counted as work in that respect.

In the early 1990s, Sweden entered its deepest recession in the postwar period. Between 1990 and 1993, the Swedish unemployment rate spiked from 1.5 percent to 8 percent, or from just under 3 percent to 13 percent when measured by total unemployment (the sum of open unemployment and program participation). Active labor market policies (ALMPs) became the main short-run policy instrument to counteract the rise in open unemployment endeavoring to provide income support for the unemployed. Although compensation could be granted for no more than 14 months, eligibility could be renewed through participation in ALMPs that were systematically used to this end. Many in Sweden and elsewhere questioned whether ALMPs could actually account for earlier low levels of unemployment. Longitudinal research conducted alongside international comparisons found very little evidence that ALMPs played a key role in keeping Swedish unemployment low. Relief work, for example, crowded out regular jobs in some sectors, so that the net effect on unemployment was smaller than the number of participants.

Existing labor market programs were modified while new ones were set up pursuant to newly accrued wisdom. Between the late 1980s and the early 2000s, participation in training programs enabled participants to renew their eligibility for UI benefits. This system was nullified for all labor market programs in 2000 in connection with a reform in the UI system and the introduction of the activity guarantee. Trainee replacement programs (1991–1997) subsidized employers who trained or hired employees from the Public Employment Service (PES). Self-employment grants were yet another type of subsidized employment. Contingent upon preliminary scrutiny by employment offices that also arranged entrepreneurial training, these grants were given to unemployed persons to start their own businesses; they consisted of unemployment benefits for up to six months.

In the 1990s, relief jobs were used only to a small extent prior to their final abrogation in 1998; they were replaced by so-called work experience programs, where participants were supposed to be placed in jobs that would otherwise not have occurred in order to avoid crowding-out effects. Recruitment subsidies had been introduced in 1981 only to be superseded in 1998 by employment subsidies targeted mainly at the long-term unemployed.

Resource jobs were introduced in 1997. This program was a subsidy to employers for temporarily hiring unemployed workers (six months with an option to prolong it by three months). Participants were supposed to both work and undergo training. The wage rate was capped at 90 percent of participants' previous income. The activity guarantee has targeted persons at risk of becoming long-term registers at the PES, or those who have exhausted their UI benefits. The activity guarantee is a framework whereby participants receive the equivalent of UI benefits, but in return are supposed to search for a job, to participate full time in a regular labor market program, or to be engaged in some training program. There are only three ways to leave the guarantee: by finding a regular job lasting at least six months, by participating in regular education, or by leaving the labor force. Changes have been made to the rules of the UI system. Participation in labor market programs no longer renews UI benefits—the only way to renew eligibility is through an ordinary job. If an unemployed worker failed to find a job within the 14 months of UI benefits, a caseworker at the PES office may decide to either transfer the worker to the activity guarantee or award him or her another period (14 months) of UI benefits. Those who did not manage to find a job after a second period of UI benefits are transferred to the activity guarantee or else lose all income support, possibly apart from means-tested social assistance.

Administrative corporatism entails a powerful bureaucracy to steer labor market policy and social partnerships. The most dramatic institutional changes occurred in the early 1990s, when the Confederation of Swedish Employers decided to withdraw from the governing boards of almost all government agencies including the National Labor Market Board—a highly independent agency that had been vested with both policy making and implementation. Following the withdrawal of employers, labor unions were excluded as well by the government, since their participation was not seen as legitimate after their counterparts had left. Representatives of unions and employers have remained in some advisory functions, but the individuals in question do not represent the organizations formally but rather have personal mandates. From the outset of the 1990s recession, employers have advocated liberal policies that have been at odds with the idea of large government programs for workers' retraining and relocation. Labor market policies have been increasingly marked by fundamental conflicts between employers and unions and between left and right because both government and unions give priority to redistribution over economic growth.

The social democrats were in government from 1982 to 1991 and from 1994 to 2006, so they have held office during most of the past 25 years. An

outside option per se has not been a strong reason to bypass corporatism. Provided that the unions expect to achieve more favorable outcomes through direct cooperation with their social democratic allies, they venture to do so rather than bargain within corporatist institutions. The Swedish Employers' Confederation (*Svenska Arbetsgivareföreningen*, or SAF) and its successor organization, the Confederation of Swedish Enterprise (*Svenskt Näringsliv*) had reoriented themselves strategically and decided to engage in lobbying rather than sustain corporatist arrangements, therefore breaking down Swedish corporatism.

Formerly, the main function of ALMPs was to cushion the blow of unemployment for those who become unemployed, not to speed reemployment or increase overall employment. From 1941 to 1991, Sweden maintained full employment owing to social democratic ideology and as a matter of long-term institutional buildup embedded in a political culture of independence from neoliberal directives. Desperate times have entailed bold measures, since the lenient system was highly susceptible to exploitation and misapplication. Active labor market policies mitigate the moral hazard of generous unemployment insurance: By making compensation conditional on accepting regular job or placement offers from employment offices, ALMPs test determination to work. Devising policies to raise employment stays on the front burner at a time when chronic unemployment looms large in Western Europe. Many scholars exalt Sweden's commitment to support the unemployed and to reform the mix of ALMPs when they do not seem to be as efficient as possible, while undertaking to come up with an optimal formula.

Comparing Health Care, Education, and Social Services across Nations

This chapter dealt with three of the five giants identified by Beveridge as standing in the way of reconstruction: want (social security), ignorance (education), and disease (health) (Timmins, 1996, p. 12).

Over the past three decades, aging population next to a boosting health industry composed of burgeoning new technologies, drugs, treatments, and ancillaries put a lot of financial strain on public health systems. More and more, governments need to offset countervailing tendencies, settle equity versus choice, enable universal access but deter free riding, and provide high-quality treatment but still contain costs. While measures taken by governments are contingent upon historical

policy legacies and institutional settings, a convergence is evident as very similar tactics are devised.

Singapore seems to have it all: The 3Ms system has instilled some cost consciousness in citizens who are presented with a bill for services rendered. There are no free riders, as the government picks up the tab only after means-testing the applicant and his family, so Medifund is activated only as a last resort. Singapore's triad of healthy population, highly satisfied patients, and a low public expenditure on health as a percentage of GDP is envied by many developed countries. Yet customer satisfaction as well as the general health of a given population hinges upon many factors; it can be ascribed neither to relative nor to absolute performance of health systems (Barr, 2001; Pauly, 2001).

To maintain sustainable social insurance, the Netherlands also came to grips with the health care system, undertaking to privatize it completely. By adopting Enthoven's blueprint, the Netherlands has become the closest it can get to his theoretical model of "managed competition." Thwarting "cream skimming" and risk selection as suggested by Enthoven, the Netherlands had purportedly removed the most prevalent obstacles that may obstruct free choice and universal access. It took more than 20 years to fully realize the reform, and it is still a work in progress. Both Singapore and the Netherlands have taken very similar measures to assure quality and responsiveness: The Dutch Health Care Inspectorate (IGZ), which is an independent agency within the Ministry of Health, Welfare, and Sport, conducts regular inspections while monitoring complaints and performance. Singapore has embarked on a rigorous benchmarking regime for the past three decades, instilling quality assurance measures alongside innovative management techniques. Those efforts culminated in 2001, when five former national agencies were amalgamated to create an all-encompassing statutory board to license, accredit, survey, and audit for the sake of quality (Lim, 2004a).

Australia and Argentina have both struggled with the free rider problem to which they were both highly susceptible due to their unique mix of private and public provisions. The problem is further obfuscated by the inherent strain in federal systems where responsibilities as to who funds, who decides, and who renders services are oftentimes blurred. Australia has managed to reduce incentives to free ride by giving tax concessions that induce low-income earners to take up private insurance while imposing financial penalties on high-income groups who would otherwise rather not buy private insurance. Many have subsequently opted for private insurance, but great dissatisfaction with private insurance persists due to large out-of-pocket costs (Healy et al., 2006).

Argentina is beset with economic and social problems; it is hardly surprising that its health system is also in dire straits. Argentina struggles with a fragmented social insurance system, too many free riders (institutions and individuals alike), and a very high percentage of uninsured having to rely on an underfunded, low-quality public system. Argentina has failed to resolve most issues; *Remediar* is the silver lining of the otherwise very dark cloud. Launched in 2002, this program provides free medical consultation and dispenses drugs free of charge, catering to the most vulnerable, indigent members of society (Cavagnero and Bilger, 2010). Argentina has failed to introduce a mandatory list of medical rights or entitlements, to consolidate the social health insurance system, and to reduce free riding. From all the countries vetted in this section, Argentina is the only one that neither forged an institutional rationing and allocating mechanism nor launched any performance indicators and/or quality assurance measures. Those two mechanisms interact, making it possible to ration the most evidence-based, high-quality treatments, but both are absent in the wanting Argentinian system.

Although the systems under consideration are structurally different owing to historical contingencies and institutional settings, they tackle similar difficulties and come up with very similar solutions: privatization, some degree of competition to foster consumers' choice, heavy inspection and regulation regimes, quality assurance measures, and disseminating information to beget an informed patient in light of the problem of information asymmetry.

The essence of modern economic growth theory is the notion that societies need a critical mass of educated people to provide the kind of seedbed in which new ideas and technical innovations prosper. Left to themselves, parents might not fully appreciate the capacity of their child or wish to invest optimally in his or her education, never having enjoyed the fruits of a good education themselves. For some, education may be a mere vehicle for ostentatious consumption; for others, a way to an egalitarian utopia; for yet others, a means of instilling respect for tradition (Glennerster, 1998, p. 28). As capital and ideas now flow across national boundaries with the speed of the electromagnetic spectrum, international interdependence has replaced national autonomy as the prevailing global condition, and countries are compelled to reexamine both their foreign and domestic policies. One consequence is that countries are increasingly occupied with similar policy issues and select from similar sets of ideas in seeking solutions. Intensified interdependence has its costs, since countries are presently tugged by dual forces of economic cooperation and commercial

competition. For industrialized nations, international economic competition is currently the most intense force propelling national policy; in no other domain is it more evident than in education.

The central economic problem facing policy makers in industrialized nations is how to increase productivity. Economies are now dominated by high-cost money, extensive internal and external competition, rapidly shifting markets, and new technologies affecting products in terms of their development, production, and dissemination (Guthrie and Pierce, 1990). Because of these changes, human capital is becoming a critical economic resource rather than a dispensable factor of production. Employment growth, most critical to a nation's economic standing, is likely to occur not in basic manufacturing but in sectors such as advanced manufacturing, information, high technology, and specialized services. This entails a highly skilled, adaptable, and possibly creative workforce. At a time when many new jobs require higher communication, computing, and reasoning skills, national assessments of students indicate that entrants to the workforce frequently lack such faculties. Nations and businesses are interested in reforming education in order to furnish students with education, skills, qualifications, and motivation before they enter the workforce. Although individuals gain from being prepared for skilled work in the form of higher earnings in later life, benefits are not just reaped by individuals but spill over to the rest of the economy, since firms are attracted to areas replete with well-trained people (Glennerster, 1998, p. 28; Guthrie and Pierce, 1990).

Britain and the United States demonstrate how international competitiveness bears on industrialized nations, impelling them to espouse new policies to remain competitive, as much of the blame for both America's and Britain's deteriorating economic positions has been placed on each nation's respective education system. The welfare state as well as the social democratic political consensus reached its apotheosis in the 1960s, first in the United States and later in Great Britain. The oil shocks and recessions of the 1970s had brought an end to those welfare states' heydays; henceforth, the right-wing strand overrode others, as neoconservatives denounced the welfare state, aiming markedly at its three pillars of health, education, and social security (David, 1991; Elliott and MacLennan, 1994).

Similar trends have been evident in both Britain and the United States where reforms have emanated from the same New Right seedbed: Attempts have been made to coerce higher performance through testing and evaluation regimes while subjecting students' results to the glare of public information and citizen scrutiny. The negative end of the rigor spectrum sanctions punitive measures for poorly performing schools.

In the same New Right vein, a greater measure of customer choice has been injected into schooling. If parents and pupils can exercise options to attend a wider range of schools, so the argument goes, then educators will strive more forcefully to satisfy client expectations and enhance instructional productivity in the process. Britain has laid more emphasis on the former, whereas the United States has opted mainly for the latter. In both countries it is mostly the "haves" who can exercise choice: In Britain, the offspring of well-to-do parents enjoy either good state schools in their residential catchment area, or their parents send then to a good private school; for them it is a win-win situation. In Wisconsin, the more knowledgeable, thrifty parents who are *au courant* and know when and how to pursue vouchers for their children get the upper hand. Outcomes have been rather dubious in any event. Many low-quality, ad hoc private schools have been erected in Wisconsin, endeavoring to reap the benefits of publicly funded vouchers, utterly subverting the tenet that vouchers and choice cater to the deprived by providing them with high-quality education otherwise beyond their reach.

In Britain, the most apparent outcome of the last three decades of reforms has been a hostile, cowed, and abashed teaching profession, pitted against parents, officials, and administrators alike. There seems to be no persistent improvement of performance compared to European competitors, casting a shadow upon the British economy. The problem of unfavorable life chances or familial circumstances, poverty, and deprivation prove to be a classic wicked problem: It is persistent, intractable, and insusceptible to simple solutions or interventions. In Britain, from the first term of Thatcher's conservative government, strong centralization has taken place in almost all areas of government's remit including education. The advent of a New Labor government in 1997 did not change this tendency: Centralization has rather carried on, all the more forcefully.

The French education system has undergone changes exactly in the opposite direction, devolving funding to regional authorities and delegating managerial powers to university presidents. As in Britain, in the 1980s more accountability was infused into the system, so resources were no longer allocated through arbitrary administrative decisions, but rather needed to be justified, elaborated, and rationalized. France and Britain were antipodes for many years in terms of their education system: Britain had a very dispersed and decentralized system with every LEA functioning de facto as a local ministry, whereas France was highly centralized—thence the Ministry of Education had been dubbed *Le Central*, or "the center." During the past three decades, those systems have become quite congruent

as they met halfway on the centralization-decentralization continuum (Deer, 2002; De Meulemeester, 2003) and embarked on performance measurements in one form or another. Investment in education is commendable, but so long as governments are the big and main spenders, they exert their will in ways that may stand in the way of cherished academic freedom; hinging upon the public purse is not without its flaws, since he who pays the piper calls the tune (Deer, 2002).

The People's Republic of China has also decentralized its higher education system for the last 30 years, venturing to retain its protracted miraculous growth while maintaining its competitive edge. China faces a tall order, since it endeavors to tiptoe the fine line between checked decentralization that gives rise to Western-style enterprise, innovation, and thrift versus one that may give way to rebellious clamor in a Tiananmen Square-like manner. Like many other areas of economic activity, higher education is no longer the government's stronghold allocating places, jobs, and positions: Free-market mechanisms hold sway nowadays. The question to which extent to devolve and encourage free thinking and initiative versus how much power to hold onto will continue to be the elephant in the room. In terms of embracing NPM-style appraisal mechanisms to evaluate its higher education institutes, China has yielded to this (mainly Western) epoch's zeitgeist, upholding regular, strict, and systematic inspections.

Social security issues at large and specifically pensions have been high on the political agenda in almost every developed country for the past 30 years. The post–World War II progenitors of social security programs boosted existing programs and contrived new ones based upon high fertility rates, full employment, and a male breadwinner. Those assumptions were barely accurate back then, but for the last four decades, things have changed drastically. Even the most developed economies in times of growth and prosperity endure some degree of unemployment and are unable to guarantee full employment for their inhabitants; this rudimentary Beveridgian presumption has been long ago forgone. All around the world, populations age as longevity increases and fertility rates wane. Almost all pension programs were pay-as-you-go plans, meaning that the current working population paid for current retirees. As those systems had matured, they became insolvent, bearing more and more on governments' budgets. Something needed to be done to address this demographic time bomb (Bonoli and Shinkawa, 2005).

Coinciding with the heydays of NPM, most countries opted for at least some degree of privatization. Pensions ceased to be a promise made by states to their future retirees, but rather a personal duty of workers to put

aside some of their income for their future retirement, fending for themselves by securing their prospective revenues. The state remained in a residual position: regulating, enabling, and administering a safety net—a subsistence-level pension for indigent citizens who for one reason or another did not accrue sufficient resources to provide for their old age. This transmutation from defined benefits (DB) to defined contributions (DC) shifts the risk from governments to citizens and employers. Upon retirement, extrapolating life expectancy (via tables, which consider gender, family risk factors, and so on) and hinging upon the accumulated sum, a monthly pension will be rendered. Recent developments shifted the burden further from employers to individuals alone in order to maintain low labor costs in a globalized world. Such is the case in Chile and Japan, where employers' contributions are no longer allowed, therefore ruling out the former risk sharing between employers and employees. The most salient task facing governments is to propel a cultural shift and make people comprehend that assuring their livelihood in their old age is their own responsibility rather than their governments'. Taking in this notion entails renouncing some current indulgence for the sake of future comfort. It is rather challenging to persuade people to forsake some of their conspicuous consumption when who you are is what you buy.

Current generations face a double burden, having to finance their parents' generation's pensions as well as their own. This phenomenon has been paramount in Japan, which faces the highest pressures in the developed world in terms of its overriding demographic time bomb combining extreme longevity with dwindling fertility rates. Moreover, pensions have been raised too much following the post–World War II economic boom. After four and a half decades, the party ended, so current spending on pensions no longer tallies with Japan's economic standing.

Another caveat regarding pension privatizations stems from the complexity of this product. The problem of asymmetric information between providers and clients is prominent because an average client for the most part is unable to fully understand figures, possibilities, and ramifications. By the same token, it is almost impossible to gauge even roughly the prospective monthly allowance a private plan will eventually yield, since funds are injected into the economy and invested locally and abroad, and hence subject to market fluctuations.

When privatizing, governments undertake to ensure a degree of choice and competition though a curbed one, so that clients can compare products and be well informed rather than swindled and wrongfully lured to join or to switch between plans. Chile exemplifies the need to regulate and

attune the system consecutively: The Chilean system had been too dispersed and segmented toward the end of the 1970s, consisting of 35 plans. Following privatization, only 12 AFPs, private for-profit corporations, composed the system; toward the end of the 1990s, their number almost doubled (21) after new competitors entered the market. Later on, that number dropped to six—an upshot of closures and mergers. Adamant to perpetuate a certain degree of competition, the government oftentimes intervenes in order to fine-tune the system. What is quite conspicuous in Chile, however, is the radical introduction of a private social security system earlier than most countries in the world; social security systems in general and chiefly pensions prove to be difficult to entrench or restructure, since it is a sensitive issue concerning all electorates with their potential political clout. No wonder then, that Chile's undemocratic, authoritarian 1980s government inaugurated a revolutionary reform, whereas most democratic governments need to make do with piecemeal, wavering, mainly incremental alterations.

In Poland and in other CEE countries restructuring of pensions coincided with restructuring of the entire economy during transition to a full-fledged capitalist market economy. In 1998, a second privatized pillar was introduced alongside the national, public one administered by the Polish Social Insurance Fund (ZUS). As private pension funds were injected into the national economy, an adverse flow of revenues from privatization proceedings to pension funds occurred. Apart from transaction costs that needed to be considered, a new layer of management and administration was interposed between pensioners and their savings. Approaching the government's deficit ceiling, privatization was moderately reversed in 2011, having some of the private funds diverted back to the public pension regime. Estonia, Hungary, Slovakia, Latvia, Lithuania, and Romania have recently partially or completely reversed their earlier moves from pay-as-you-go (PAYG) systems with relatively high contribution rates toward compulsory defined-contribution plans. As Poland had to tackle complications epitomizing many CEE countries, it soon followed suit (Jarrett, 2011).

NPM-style measures have different impacts on various sectors of many countries. In Sweden, NPM has been most apparent in active labor market policies (ALMPs). One of the most salient NPM tenets stresses the need of public institutions to be efficient and effective; namely, to do more with less. This mandate resonates in the changes Sweden has induced in its ALMPs; whereas formerly lenient ALMPs were mainly a means of muddying the real extent of unemployment, they have been transformed to straightforward measures endeavoring to reintegrate unemployed into the labor market.

Seeking major entrenchment or restructuring of the Swedish welfare state, still one of the more expanded (and some may argue generous) of them all, ALMPs spring to mind as an example of conspicuous policy shift. This shift is imputable *inter alia* to declining corporatism. Reform within existing social programs and labor market programs—sometimes necessary in mature welfare states—requires coordination across policy areas where interest organizations play a pivotal role. Corporatism according to some accounts has also been declining in the Netherlands where corporatist politics in the 1980s and 1990s shaped the still germane wage agreements. Conversely, corporatism in Denmark has been said to be on the rise nowadays after a protracted ebbing from the 1970s on (Anthonsen et al., 2011; Lindvall and Sebring, 2005).

In all of the cases portrayed above it has been demonstrated how NPM-style reforms have dramatically altered the contours of the classic welfare state, reducing it to a regulator and an enabler rather than a service provider. The modern welfare state is no longer a "nanny." Whether to dub those processes as representing "retrenchment" or "restructuring" is a matter of taste and a rather obsolete, futile debate. It remains to be seen how states and governments will redefine their role in the future; their most challenging undertaking may be to revamp relationships with citizens, demarcating mutual responsibilities and obligations anew. As government-citizenry relationships are an ever-changing landscape, this issue is by no means a new one. In his book *Politics in England*, Richard Rose quotes a commentator questioning his government's ability to deal with contemporary complex problems at the very outset of the previous century: "Regarding our government, we have a few tacit understandings; the problem is that those understandings are not always understood" (Sidney Lowe, 1904, cited in Rose, 1989).

A VISION FOR COMPARATIVE THEORY AND PRACTICE

Horizons of the Comparative Voyage

The human instinct to compare is instinctual and thus inevitable, and its framework and form are difficult to capture. As far as public administration and policy are concerned, everything can and should be compared under the condition that evidence-based research is used that includes (a) a carefully developed methodology and (b) transparency in the choices made when moving from unstructured problem to evidence (Desai and Harlow, 2013). This book provides a very different way of looking at contemporary government across the globe. Systematic comparisons of political systems, of government bureaucracies, and of government policies are available in abundance, but they are usually limited to a small group of countries in one world region or—more often—simply a small group of developed countries. This book seeks to provide understanding of the structure and function as well as the role and position of governments in the world in terms of trends of convergence and divergence and in terms of policy transfers and diffusions. It is a unique comparative book because it is the first that provides a global perspective on all three elements that together comprise the political-administrative system: the political system, the government bureaucracy, and public policy. The fact that the realm of comparative studies is in many ways unclear or conceptually fragile only makes the challenge and prospective dividend for practitioners and scholars greater.

There are countless ways to sketch a vision for the comparative under-standing of government through the umbrella study of public administra-tion. Our way may be regarded as only one in a series of books (for references, see Appendices 1 and 2), but we claim it is unique not only in presenting a global perspective upon the public sector as a whole, but also because we did not pursue comparison with an eye on developing theory (that would have required a clear theoretical framework and a very systematic comparison). Instead we started this voyage with the desire to provide the type of understanding that is relevant to practitioners (elected officeholders, career civil servants) and students alike. One thing that has become clear to us at the end of this voyage is that comparative perspectives will only become more important in a world that is increasingly intercon-nected. We live in an interconnected world where policies in one field/nation/region/culture affect those in others. The policy emulation and transaction of ideas and reforms become evident in almost every country or public arena. As we demonstrate in Chapters 10 through 12, many countries initiate what at first seems a unique and independent program for change and reform but eventually takes a shape that has many similarities with other programs in other places. The convergence between structures, processes, reforms, and other dynamics of public administration and policy is no smaller than the divergence among them. It is important not because it helps understand how and why others (countries) do things differently, but because it helps us respect different ways of doing things. It provides anyone with a better-informed opinion about what is good and what could be better in one's own country and its government.

Thus, comparative perspectives have a civilizing effect. As far as the study of public administration is concerned, most handbooks have national roots, and much research is conducted within one political-administrative system. This does not allow enough room for a comparative look, something that this book wishes to provide. A comparative perspective helps to go beyond this local/national orientation. This could be done by including a comparative view in every class in public administration. We should redefine the way we teach public administration and make better govern-ment by using comparative and interdisciplinary perspectives. For instance, this may transform our basic approach toward teaching organization theory, human resource management, policy analysis, budgeting and finance, intergovernmental relations, and so forth, and toward making government policies in the wider context of public action (for instance, defense, police, judiciary, economy, finance, taxation, energy, planning, industry and trade, health care, education, social services, and so forth).

Comparison in Motion: Divergence and Convergence across Time and States

The development of government was enriched by comparative perspectives since its birth. We argued elsewhere (Vigoda, 2002b) that an ordinary citizen of an ordinary modern democracy fortunate enough to undertake a journey backward in time is likely to find meaningful similarities between government of our era and administrative systems of old cultures. This comparative look at cultures throughout history enlightens the study by providing a look at what others did, do, or intend to do in other places and times.

As we tried to convey in the early chapters of this book, the comparative approach has its roots in old institutions. For example, the foundations of government and the study of public administration can be traced back thousands of years, across cultures, and in various nations around the globe. The Bible mentions a variety of hierarchical and managerial structures that served as prototypes for the governance of growing populations. Ancient methods of public labor distribution were expanded by the Greeks and the Romans to control vast conquered lands and many peoples. The Persian and Ottoman empires in the Middle East, like imperial China in the Far East, paved the way for government in the early modern and modern ages, wherein Europeans in the Old and the New World were in the ascendant. Governments have copied practices from one another since antiquity (Raadschelders, 1998b), but it is not until our time of mass media and rapidly growing levels of communication that higher levels of comparative learning were possible. The high-speed telecommunication, data, and optical fibers replaced the trade routes of ancient times, and learning by comparison became extremely fast, more effective, and hyper responsive.

If analyzed comparatively, one can find similarities and dissimilarities among and between cases anytime and anywhere. This is the issue of convergence and divergence that will be discussed later in the chapter. Surprisingly enough, many states across many years used remarkably similar sets of concepts, ideas, and methods for governing and administering public goods, resources, and interests. They all employed and continue to seek professionals and experts from various specialist backgrounds. They all used, and continue to use, authority and power as the cheapest control system for individuals, governmental institutions, and processes. Contemporary governments all face similar administrative problems: how to achieve better efficiency, effectiveness, and economy in government, how to satisfy the needs of

the people, and how to sustain stable political hegemony despite the divergent demands and needs of sectoral groups. This is very different from the past, where governments were merely interested in exploiting their populations. Not surprisingly, all states and cultures across time and geographic location also used similar managerial tools and methods aimed at solving problems of this kind. They all used, to varying degrees of effectiveness, division of labor, professionalism, centralization and decentralization mechanisms, accumulation of knowledge, coordination of jobs, complex staffing processes of employees, long-range planning, controlling for performance, and so on (Vigoda, 2002b; Vigoda-Gadot, 2009). Intuitively, one feels that nothing has really changed in the managerial and administrative process of public organizations for centuries, possibly millennia.

But this feeling is of course exaggerated. Some major changes have taken place in recent centuries to create a totally different political-administrative and societal environment and new rules, to which governments and citizens must adhere and by which they must adjust their operations. In fact, a new kind of governing has taken shape, in which government (i.e., not just the ruling elites) plays a central role. Among the major societal changes and reforms one can mention the communication revolution, the rise of media impact, and the phenomenon of a shrinking world. Some call it a global village and point to interconnectedness and light-speed interchange of data and knowledge among individuals, organizations, and governments. The major political-administrative changes include the legal separation of politics from administration (in many but not in all states), the separation of office and officeholder, the separation of church and state, the triumph of bureaucratic over collegial organization, and the provision of a constitutional foundation.

Comparative public administration uses similarities and dissimilarities to build its case for problem-oriented knowledge. As we pointed out in earlier chapters of this book, divergence and convergence are essential breaks in the wall of public administration as a science and as a profession. Despite basic similarities between older and modern governments, government in our time is an organism entirely different from that in the past. These differences include:

1. it is *larger* than ever before, and it is still expanding;
2. it is more *complex* than in the past, and becoming increasingly so by the day;
3. it has many more *responsibilities* to citizens, and it still has to cope with increasing demands of the people;

4. it is acquiring more *eligibilities,* but more than ever before it must restrain its operation and adhere to standards of equity, justice, social fairness, and especially accountability;

5. moreover, the modern study of public administration is considered an autonomous and independent member of the family of the social *sciences,* a classification that carries high esteem but also firm obligations and rigid constraints;

6. for many individuals who decide to become public servants it is also a *profession and occupation* to which they dedicate their lives and careers; and

7. most important, government is one of the most *powerful institutions* in modern democracies. It wields considerable strength and influence in policy framing, policy making, and policy implementation. Hence it is subject to growing pressures of political players, social actors, and managerial professionals.

An overview of the relatively short history of the study of modern public administration reveals that it is far more eclectic than might be thought. We demonstrated this practical eclectic nature in Chapters 9 to 12 where we showcased different solutions to similar policy problems as a function of a certain type of nation, culture, set of values, political structure, and other variants of the sociopolitical ecosystem. Recent decades have put the comparative perspective on stage again, mainly due to technological innovations and the communication revolution that made knowledge about theory and practice more open and transparent to many. What took ancient cultures many years of diffusion and learning is done today within seconds in the computerized world of information. Interconnectedness becomes the essence of learning, and comparing is the rule for action. Policy transfer and policy emulation, learning and change of institutions and practices, and globalization of know-how ventures take government actions to a new level (Levi-Faur and Vigoda-Gadot, 2004). The comparative approach, under such conditions, becomes not just inevitable but also essential and crucial for practitioners of government policies; that is, for those who turn ideas into action, and for those who study public administration for the purpose of knowing, understanding, and explaining.

The Comparative Approach in Service of Interconnectedness, Emulation, and Policy Transfer

Interconnectedness is perhaps the most influencing process in our lives in the twenty-first century. Who could imagine living in a world where global

transactions between individuals, groups, organizations, states, and other international players were unknown to the majority of the population? Talking about the comparative approach in public administration and in government is meaningless without integrating knowledge in a borderless world. As we demonstrated in Chapter 7, administrative reforms diffuse from one place to another and are enriched by specific cultural tastes and values. The actions of the modern democratic state are largely a result of rethinking knowledge and reforming actions in other nations. Those who innovate by presenting new ideas grease the wheels of the democratic order and reinforce both the foundations of the free world and of governability *under* the conditions of a free and open society (Popper, 1991).

Modern society is global and individual countries can no longer really dissociate from this globalization, and in that process people and their governments redefine the boundaries between what is domestic and what is international and global. In a shrinking world, policy lessons are increasingly learned on a cross-national basis rather than on specific national experiences and are less and less constrained by cultural and geopolitical boundaries. To have know-how about other countries is increasingly conceived as essential and relevant for the economic competitiveness of states and for the welfare of their citizens. Epistemic communities, international organizations, and policy entrepreneurs transfer this know-how to domestic economic, political, and social settings that are often radically different from the original ones in which this knowledge was first learned.

Globalization of knowledge and international policy transfers were discussed in early political science literature. Take, for example, Ernest Barker's classic study of state expansion in Europe between 1660 and 1930. Barker's major attention was concentrated on the particular history of different countries, but he was well aware of their interdependence and existence as a "social community:" Barker suggested that when we consider the history of the Modern State . . . we cannot but recognize the debt which all States owe to one another. Each country has developed according to its own genius; and each has produced its own fruit. But each has produced some institution, or some method of public service, which has served as an example to others; and each, in turn, has borrowed from each. There has been a rivalry of methods, but it has not been unfriendly; one country has studied, adopted, or tried to improve the methods of another; and all have combined, however unconsciously, to promote the growth of a common Europe standard of administration and public service." (Barker, 1944, p. 93)

So policy transfers and diffusions are an old phenomenon; we discussed them briefly in Chapter 7 and made a point for comparison of government

and public administration based on the globalization and new public management movement. What makes our time unique is the diminishing meaning of geographical distance in general and of the increasing permeability of national borders in particular, hence the increase in the quantity and arguably the quality of these policy transfers and diffusions. At the time this book was written, we were more exposed than our predecessors to international ideas and therefore, arguably, may have learned more and be able to go through the learning process with a somewhat better grip on the difficulties of innovating based on the experience of others.

The issues discussed in Chapters 2 to 12 are increasingly documented and reflected in intensive and extensive scholarly debate in the literature of the social sciences at large and in organizational studies, law, political science, sociology, social psychology, history, and economics (Vigoda, 2002b, 2003b). On one side are proponents of globalization and interconnectedness by sophisticated media and communication tools, who advocate cross-national policy learning (and convergence) and believe it holds great promise for the advancement of comparative public administration, governance, and policy analysis. On the other side are globalization and interconnectedness critics who identify emulation, manipulation, and coercion as the major forces behind the changes that are widely evident across countries and policy spheres.

This debate, then, touches first on the meaning and origins of comparison in the study of public administration and governance. Is policy learning useful, effective, and implementable in our hyperconnected world? Where does culture make its impact? And is there any advice for governments that can lead policy makers to navigate the gateway of "true and false" in their decision making? As we try to demonstrate, the hyperconnectedness has not done anything for improving deep understanding of the world in which we live, and that is because we, as practitioners and as academics, tend to cling to what we know rather than seek comprehensive understanding. Despite all rhetoric about the "hollow state," "collaborative governance," etc., do people understand that government is the only actor that can still make binding decisions for the entire population? Governments provide more services than ever before. They not only extract resources (at least in the Western world) from their subjects, but also provide many new services to their citizens. We tried to show that today without governments we may very well plunge into chaos and anarchy in many spheres of our lives. Convergence and divergence in policy and management of governments will remain an issue even in an ultraglobalized and interconnected world. In Chapters 2 to 8 we pointed to converging trends in how a territory is

governed; in Chapters 9 to 12 we learned about how countries tackle policy areas. There, too, there is convergence in terms of the types of challenges, but divergence as well, given national culture.

Comparative Public Administration and Governance: Between Transfer and Diffusion

Ginadomenico Majone suggested that far-reaching ideological, political, and economic changes begun in the late 1970s brought about "the transformations of the process and substance of policy making." (Majone, 1996, p. 611) We hope that this volume, which looks at public policy, public management, and public sector reforms beyond the territorial state (though not without it), will add new insights into future work that tries to characterize convergence and divergence in comparative studies. We set out the common conceptual grounds for a discussion of the nature of cross-national and cross-cultural interaction in government and its study of public administration, with the help of ideas about policy transfer and policy diffusion.

The notion of diffusion, especially the formulations grounded in sociological institutionalism, has three advantages. First, sociology has an impressive tradition of diffusion analysis at the national (Rogers, 1995) and international level (Meyer and others, 1997), which does not have any equivalent in public administration, political science, or policy transfer literature. Note, however, that the pioneering work on diffusion research across the American states (Gray, 1973; Walker, 1969) is an exception. It is only with the policy learning/policy transfer literature of the 1990s that the issue again became a major focus of research in political science.

Second, the emphasis on transfer among members of the social system in the diffusion literature seems to allow us to look at the process outside the top-down and bottom-up approaches to change. This emphasis figures clearly in the literature on policy networks (Rhodes and Marsh, 1992; Van Waarden, 1992) and on governance (Rhodes, 1997), which emphasizes the fragmentation of political structures and the volatility of power. It connects naturally to the notions of epistemic communities (Haas, 1992), webs of influence (Braithwaite and Drahos, 2000) and transnational policy communities (Stone, 2003) as "channels of policy transfer" across nations.

Finally, we see some value in the "contagious" aspect of the diffusion perspective; that is, in the willingness of scholars within this research tradition to look beyond the structural aspects of the governing process to its internal dynamics (this does not mean, however, that all diffusion

analysis pays attention to the contagious aspects of the process). Contagious-focused research examines how prior adoption of a trait, policy, institution, or practice in a population alters the probability of adoption for any remaining nonadopters (Strang, 1991, p. 325).

While comparative public administration enjoys much of the policy transfer approach, it is also open to the idea that "emulation" or "copying" might be a distinct and independent source of change, but there is no effort to look at it as a contagious, dynamic process of change. The policy transfer literature is essentially structuralist in its causal imagination. While the diffusion perspective offers these two advantages, it is often criticized as being politically neutral or uninformed. As diffusion analysis often focuses on broad historical, spatial, and socioeconomic causes for a *pattern* of policy adoption, it neglects the political dynamics involved (Jacoby, 2000, p. 8; Peters, 1997, p. 76; Stone, 2003, p. 4). Here the policy transfer literature that distinguishes between coercive and voluntary mechanisms of transfer seems to have the upper hand. Power in the sociological-institutional diffusion perspective is confined almost solely to the power of ideas, norms, and symbols. Yet these ideational forms of power are hardly coercive and interest driven, and frequently are not the major focus of the diffusion analysts.

We believe that our book confronts these problems and pitfalls in a relatively balanced way. We submit that comparative public administration and comparative policy analysis are to be enriched from the policy transfer, policy diffusion, and management of reforms literatures across borders and cultural perspectives, and it is possible to demonstrate how these approaches may inform each other. This is evident in the work of Stone (2003), who suggests that global policy networks make a major impact on the way policy is shaped on the global as well as national level. She distinguishes three models that combine the assertions about the power of ideas and knowledge with the network approach: the epistemic community approach, the embedded knowledge networks framework, and the transnational discourse community approach (Stone, 2003). She then places her "knowledge actors" in a framework of analysis that combines the policy network approach and the policy transfer literature, and in doing so opens up a new frontier for policy analysts. The move to the greater comparative and global level repeatedly raises the question about the centrality of the state vis-à-vis international organizations, nongovernmental organizations, corporations, and cities in these networks of power. Only a few of those organizations are mentioned and discussed in our Chapters 9 to 12, but there is also only so much one can cover in this type of book. Scholars diverge on this point, as they do about the two concepts of diffusion and policy transfer. In general, policy transfer seems

to reflect the dominance of the territorial state in public administration and political science literature while the diffusion perspective reflects the notion that states are recipients of a normative order that is created outside them, and they are, therefore, secondary in importance to international norms. We believe that such a theoretical perspective is useful and constructive in integrating the many ideas about comparative public administration and policy as suggested in this book. The cases we present and analyze for public administration and public management reforms reflect both emulation and diffusion and thus enrich the comparative approach by increasing disciplinary connectedness and knowledge sharing.

Another major issue in the policy transfer and diffusion literature touches on the degrees and types of rationality that are involved in the process of change and reforms (Levi-Faur and Vigoda-Gadot, 2004). Some versions of the policy transfer literature, such as lesson drawing (Rose, 1993) and social learning (Hall, 1993) seem to perceive the process of transfer as a learning process. In this literature, the emphasis is on cognition and the redefinition of interests on the basis of new knowledge that affects the fundamental beliefs and ideas behind the policy. In some way related, though more demanding, are models of Bayesian learning (Meseguer, 2003). These models claim for the dominancy of probability in our life, in policy making, and in any other decision relevant to human action. Quantities of interest are governed by probability distributions, and optimal decisions can be made by reasoning about these probabilities together with observed training data. For example, in finance and economics, the strength of the price impact of unanticipated information depends on the relative precision of consumers' or traders' prior and posterior beliefs. By contrast, sociological interpretations of the process of change emphasize a group's norms rather than individual rationality.

See, for example, Martha Finnemore's argument about the notion of state interests. Finnemore suggests that

> state interests are defined in the context of internationally held norms and understandings about what is good and appropriate. That normative context also changes over time, and as internationally held norms and values change, they create coordinated shifts in state interests and behavior across the system. . . . States' redefinitions of interest are often not the result of external threats or demands by domestic groups. Rather, they are shaped by internally shared norms and values that structure and give meaning to international political life." (Finnemore, 1996, pp. 2–3)

This emphasis on the normative side of supposedly rational action suggests that emulation may be of some importance as a mechanism of policy (ex)change and public reforms. It also necessitates a distinction between learning and emulation as major features of the process of policy transfer. The distinction between the two may be based on the scope of information involved in the decision-making process. Policy learning is defined as the redefinition of one's interest and behavior on the basis of newly acquired knowledge, after watching *the actions* of others and the *outcomes* of these actions. Policy emulation, by contrast, is the redefinition of one's interest and behavior on the basis of newly acquired knowledge and after watching only the *actions* of others (Jordana and Levi–Faur, 2003). In comparative public administration we thus have to distinguish between the learners and the emulators by the extent to which adaptation to new behavior involves information not only about the actions of others but also about the consequences of those actions. The crucial difference is that the learner processes a greater amount of information than the emulator and is therefore less dependent and more autonomous.

Finally, the outcomes of policy transfers and diffusions are often presented through the expectation of convergence. Convergence theories postulate that growing international integration will have direct implications (for example, a change in the domestic distribution of political power) and indirect implications (for example, an influence on government policy) for domestic policy that will lead to similar policies and institutions. This is usually contrasted with divergence theories suggesting that growing international integration will not deflect states from their historically rooted trajectories, so that not convergence, but constant and perhaps even increasing variations will be the result for policies and institutions. The expectation of convergence in diffusion theory reflects a scholarly bias that is not necessarily implied and embedded in the theories of transfer and diffusion (Jacoby, 2000, p. 8). Indeed, Gabriel Tarde (1903), one of the founding fathers of sociology and author of *The Laws of Imitation*, describes the process of diffusion as one in which agents simultaneously converge on a fashion and distinguish themselves from others. The process of change and reformation may involve convergences and divergences at the same time. Many of the examples we present in Chapters 9 to 12 testify to this. The bias inherent in some of the diffusion and policy transfer literature toward a sort of "convergence" might best be balanced by a notion of change that considers both convergence and divergence as important dimensions.

Horizons for Comparative Public Administration and Governance

One of the most important debates in the social sciences in the last decade focused on the future of the nation-state (Marsh and Smith, 2004; Weiss, 2003). This future will be highly determined by the way we compare, emulate, and allow diffusion of knowledge and ideas from one actor to another, from one institution to another, and from one reform to others. Various scholars argue from different points of view that the power of the state, and thus of governments, is expected to decline and that new types of actors and political organization are gradually taking over responsibilities and policy capacities that were once the exclusive domain of the territorial state (Ohame, 1995; Strange, 1996). A forceful argument to that effect was made recently by Braithwaite and Drahos (2000), who argue that most states outside Europe and the United States "have become rule-takers rather than rule-makers." That is,

> the extent to which states have become rule-takers rather than rule-makers is greater than most citizens think, largely because when governments announce new regulatory laws they are somewhat embarrassed to disclose that the national legislature voted for those laws without having any say in shaping them. . . . For years some of Australia's air safety standards have been written by the Boeing Corporation in Seattle, or if not by that corporation, by the US Federal Aviation Administration in Washington. Australia's ship safety laws have been written by the International Maritime Organization in London, its motor vehicle safety standards by Working Party 29 of the Economic Commission for Europe and its food standards by the Codex Alimentarius Commission in Rome. Many of Australia's pharmaceuticals standards have been set by a joint collaboration of the Japanese, European and US industries and their regulators, called the International Conference on Harmonization. Its telecommunications standards have been substantially set in Geneva by the ITU. The Chair (and often the Vice–Chair) of most of the expert committees that effectively set those standards in Geneva are Americans. (Braithwaite and Drahos, 2000, pp. 3–4)

However, in this book we largely disagree with this observation and suggest a contradictory view: that governments are here to stay, that public

administration is here to work and expand, and that alternative models for governance, however prosperous, will still have to run in the speed determined largely by political institutions and by professional government-controlled agencies. Despite dilemmas and paradoxes facing nations everywhere, bureaucracy and democracy in modern societies must work in collaborative patterns to make public services better everywhere, beyond frontiers and borders, time and culture, values and conflicts (Vigoda-Gadot, 2003b, 2009). Once again, governments are the prime actors in making decisions for societies as a whole.

In light of this view, our position is one in favor of a comparative perspective that may change the study. The evolution of different approaches to public administration (i.e., public management, public policy) inside and around the field (for instance, policy studies, public personnel management, information management, e-government, and so forth) carries promises but also risks for the study's position and role as the umbrella study of government. Peters (1996) noted that modern public administration greatly reflects lack of self-confidence both as a science and as a profession. That is, however, really the "traditional" perspective upon the study of public administration. We believe there is no identity crisis as soon as we depart from the notion that the study of public administration has to meet the standards and practices of the natural sciences (Raadschelders, 2011b), and thus it is that an intensified comparative look into existing and potential change has much to offer academic studies and practical development. The current incapacity to guide governments through a comprehensive route of public policy reform may change if and when greater and more systematic comparative perspectives are adopted. Much of the accumulated wisdom in the study of public administration has been obtained through comparison, through social experiments, the commission of policy errors, and learning from them about better ways to serve the people.

One should also take into account that the comparative road to knowledge carries costs. Inadequate comparisons may lead to wrong decisions. Making mistakes based on misleading comparative observations costs money, much money, from all of us, the taxpayers. Like good customers in a neighborhood supermarket, citizens should be aware of the services they receive, of the price they are asked to pay, and of governmental actions that should be taken to produce useful changes. Therefore it is in the citizens' interest as well as that of governments and its bureaucrats to adopt a combined global and comparative perspective into their process of policy and decision making. To that end, it is essential that a clear horizon for strong methodologies and comparative avenues will

be developed, both quantitatively and qualitatively (Vigoda-Gadot and Mizrahi, 2014).

More so, demands for better operation are generally aimed at governments, but they should be, and are, also targeting scholarship. Science has the potential of exploring new knowledge, of developing new ways of looking at old things, of generating better explanations for relevant administrative problems, of applying sophisticated and useful professional methods, and, most important, of directing all available resources to produce successful and practical recommendations for professionals. Its prime goal is to design a comprehensive and global, comparative-based theoretical view of public systems that is clear, highly efficient, effective, thrifty, and socially oriented at the same time. This cannot be achieved without extensive understanding of the diversity, complexity, and interdisciplinarity of the study of public administration. The combined global and comparative route, again, is a most valuable instrument.

In many ways the persistent public mistrust of governmental services and institutions across the globe, together with the marked fragility of public administration as a science, inspired us in the voyage that we embarked upon and is presented before you. The fragile state of comparative knowledge of the study of public administration is the point of departure for a different kind of discussion, which is broader and multi-perceptional. Our core argument is that one can find many ways to depict administrative systems, their functionality, and their relationship with the public. The examples presented in this book demonstrate this heterogeneity in cases, reforms, and experience. A straightforward approach may be to simply compare the cases one is familiar with to others and look for anchors of analysis, for convergence and divergence. But a real progress that may be set as a challenge for future comparative studies is the integration of many comparative approaches into a comprehensive approach. Such a comprehensive approach, though, is not grounded in a desire for unity of knowledge. That is a classical and worthy desire, but irrelevant to understanding the social world. A comprehensive approach to public problems is one where elected officeholders, career civil servants, other stakeholders, and citizens tap into the knowledge sources relevant to the issue or problem at hand. Given that no public problem is alike, and given that it is reasonable to assert that public problems will vary with time and place, it is then obvious to suggest that the study of public administration explores how it can be the umbrella discipline for any public problem. A one-size-fits-all solution for the wide range of collective and public problems that governments face today is simply inconceivable.

There is another strong argument in favor of the combined global-comparative perspective. It allows for heterogeneity of views, ideas, value-based initiatives, and policies to walk in and make a difference. It also allows for systematic analysis of comparable principles and learning from their potential contribution. The answers it provides may not be applicable to all cases across all places and time, but their value is in looking at the small details of a larger picture.

Hence, a major assumption we make is that only mutual efforts and quality combination of critical knowledge from a variety of social science disciplines and methods can yield a real opportunity for making comparative public administration a real added value to our knowledge and tools. The translation of science into operative acts by government must rely on such sufficient wisdom, which can be accumulated from various cultural and national branches. The potential contribution of this volume is thus its effort to bring these views together and to produce a multifaceted comparative analysis of modern public administration.

Summary and Final Remarks

As demonstrated in many of this book's chapters, modern states across the world face serious problems of adhering to the public's needs and to a rapidly changing environment as well. Achieving one target is usually accompanied by painful compromises on others, and limited resources are frequently cited as the main reason for failure in the provision of services. Moreover, fundamental changes occur in people's lifestyles as well as in their beliefs and ideologies. They are intensified by high technology, communication systems, new distribution of capital, and the rise of civic values that have not existed before. All these lead citizens to perceive governments and public administration systems differently—through the lenses of values, beliefs, history, fears, and dreams.

Similarly, the role of the state and its relationship with bureaucracy and with citizens is undergoing a substantial transformation not only in the minds of the people but also in scholarly thinking. In a rapidly changing environment, government has a major function and embraces new aims that must be clearly recognized. It remains the best tool democracy can use to create fruitful reciprocal relationships between the state and citizens, but on a higher and better level. Borrowing again from Karl Popper's seminal work (1945), the underexplored path for global and regional development and prosperity is a participatory governance ethos (with liberal political

values) where learning from others by comparative tools is a valuable asset. Hence, to uncover the major tasks and challenges facing governments today we require a cross-disciplinary strategy, comparative arsenals, and improved integration of all available knowledge in the social sciences and beyond.

We mentioned here and elsewhere (Vigoda, 2002b) that contrary to the heavy, formal, and inflexible image of bureaucracies, public sector organizations in America and Europe have been in a rapidly intensifying transition since the late nineteenth century, and that such transitions have been experienced in other parts of the world since the Second World War. We see the global and comparative avenue as one that deserves greater attention from academics and practitioners across the globe, and greater debate among those practitioners and academics who seek higher and more extensive understanding of bureaucracies and government systems. This process presents new challenges for the comparative method in public administration—and a greater obligation. Perhaps the most important is to integrate more widely existing knowledge of the social sciences with efficient public action and with quality governmental operation into the comparative vision. In the coming years, public administration will be evaluated by higher standards of providing understanding, by more rigorous comparative and other methodologies, and by more comprehensive understanding of successful and less successful cases of change and reforms. After all, the study of public administration and the art of government are in a continuous transformation along with life, technology, values, and institutions. Therefore the global and comparative vistas will continue to direct scholars and policy makers, scientists and public managers, as well as citizens and other interested agencies in their ways of thinking and action. Where else can these come from if not from looking at other units and at the universal puzzle of choosing among the right patterns for one's specific nation and culture? The exploration of new interdisciplinary horizons for comparative public administration is thus essential and inevitable for the successful passage of the field into the third millennium.

Almost all natural and social problems today are global by nature. As we tried to demonstrate in this book, they are pondered and evaluated by many in different ways and cannot be solved or resolved by a single actor. Global warming, climate change, and rising sea levels; the garbage patches in the Atlantic and in the Eastern and Western Pacific Oceans; migration; poverty and increasing income inequalities; terrorism; nuclear proliferation; epidemics and diseases; ethnic and religious conflict; the extinction of species; wars for water, for land, or for sea resources—the list is endless, and the expectations people have of governments are skyrocketing. We live in a highly

interconnected world where it appears that change accelerates and where the challenges seem larger than ever before. The width of social time—that is, the time it takes for a message from one person to reach another—has decreased from months and days to mere seconds, and this has only been so in the past 20 years. A natural or man-made disaster, a major traffic accident, an unforeseen oil spill, a human tragedy, a terrorist attack, we will know about within hours if not faster. This 24/7 window to the news of the world has enhanced people's sense that the world is a dangerous place and that uncommon capabilities are needed to deal with the consequences of real disasters and with the potential of imagined events. Some may say that the characteristic for global challenges is that they are not interesting to the corporate world unless they would jeopardize the bottom line: profit. And even if it would threaten the bottom line, corporate actors do not have the authority to make binding decisions on behalf of all citizens. Other scholars and pundits may talk about the "hollowing out" of government.

By contrast, we argue that *government is the only (formal and informal) actor in every society that can make binding decisions on behalf of the citizenry at large.* In today's world people deal with the hazardous global natural and social environmental challenges through a variety of actors, and most prominent among them are governments and their experts. The new magic these governmental and expert actors embrace are, respectively, collaborative governance and interdisciplinarity. Thus, both collaboration (Vigoda-Gadot, 2003b) and interdisciplinarity (Vigoda, 2002b; Raadschelders, 2011b) are major horizons for future global and comparative studies in public administration. We suggest that what is needed to (re)solve global and public problems is not just government or governments that work globally. While they are the prime actor, they still need the involvement of other actors. In the end the necessities and possibilities of (re)solving global and public problems will depend on the extent to which public, nonprofit, private, and other actors (however defined) are willing to collaborate. In this process of collaboration interdiciplinarity is the tool by which knowledge will be best used to confront future horizons and challenges. Collaborating partners must use collaborative knowledge. Interdisciplinarity has the potential to find unconventional answers to unconventional problems. The comparative method is a vehicle to successful remedies to social ills and to growing public expectations.

Along this line, technological change is another prime factor influencing public administration as a science and as a profession. It has given people access to vast amounts of information and to instant electronic interaction even about trivial events (Facebook). The effects that this

"informatization" has are not at all clear. There is, though, some indication that Internet and other communication media are rapidly changing how people's brains absorb information, and that these are literally rewiring the brain. Tools for comparison increase exponentially. The online environment is one that encourages superficial reading; people zap through or scan pages of a text rather than carefully reading and digesting it. As a consequence, the ability for information to be transferred from the short- to the long-term memory is declining quickly. This is important because the long-term memory is where the ability to understand complex concepts or schemas resides (Carr, 2010, p. 124). While a computer absorbs and stores information, the human brain continues to process it long after it has been received; to process and to digest; to digest and to compare. This is one major distinction, perhaps superiority, that human minds have over computers. The brain lives; a computer does not (Carr, 2010, p. 191). Hence, the information revolution is a threat to the consolidation of long-term memory and thus to the development and probing of complex schemas (Carr, 2010, p. 193).

Hard as it is, we cannot afford to limit our inquiries to disciplinary and interdisciplinary perspectives where global and public problems are concerned. The study that has the potential of elucidating the nature of global and public problems is that of public administration or public affairs. This was initially a study with an instrumental, technocratic focus and tradition (especially in the United States) but has grown to be so much more.

The study of public administration and governance cannot afford to develop a simple, parsimonious description of the world. Its scholars cannot afford to look at society from one specific perspective or angle the way that economists (scarcity), sociologists (interaction), psychologists (decision making as iterative process), and others do. This requires that we not only look at objective, factual, scientific evidence that can be presented as dissociated from the researcher and the degrees of which vary from randomized clinical trials, systematic reviews or meta-analyses of such trials at the top of the research quality hierarchy, via trials without proper randomization, natural experiments, quasi-experimental designs, time-series analyses with or without intervention, and regression continuity designs, to expert opinion at the bottom. Next to this, policy makers and scholars should also consider evidence as the outcome of an explicit sequence of choices made between the stage of the unstructured problem and the ultimate evidence presented. According to this logic any policy analysis starts with an unstructured problem that is in subsequent stages reduced to a researchable problem; this researchable problem is next

defined by concepts, constructs, and relationships between variables, then translated into a formal model, of which attributes are next identified, to finally arrive at the evidence (Desai and Harlow, 2013, p. 21). The value-laden nature of many policy decisions, and especially the wicked problems (Rittel and Webber, 1973) among them, requires that in dealing with global and public problems governments not only rely on scientific evidence but also on information about the choices that have been made along the way that ultimately resulted in "evidence." There is no scientific rationale upon which we can say that evidence is clear cut, not value laden, that no choices have been made about what is part of the researchable problem and what is not, that no choices have been made about how a concept was defined.

Given the highly increased awareness of what happens around the globe, the call for interdisciplinarity may no longer be sufficient. Global and public problems may actually require a-disciplinary inputs as well. Unity of knowledge in the classical sense is impossible because for each problem a different convergence of knowledge sources is required, and how they best converge can and does vary with time and with context. Elsewhere this convergence of knowledge sources around a specific problem has been called "differentiated integration."' (Raadschelders 2011b, p. 190). Public administration as a study can best serve government by being disciplined in how it connects sources and bodies of knowledge to at least improve the comprehensiveness of the understanding of global and public problems.

STRUCTURAL SIMILARITIES—CULTURAL DIFFERENCES

The Need for and Development of Comparative Government Studies

It is in the nature of people to compare. Us—them, here—there, have—have-not, more—less. The daily and implicit comparisons we all make often spring from self-centered concerns or from stereotypical judgments. Elevating comparison beyond individual concerns and judgments is, among others, what scholars do and, as far as the study of public administration is concerned, is necessary for improving the understanding of government's role and position in society. Such comparisons have to be systematic and explicit about concepts, theories, methods, and even personal experiences that inspired us. Comparisons are also civilizing, for they help people to appreciate both others and other systems. Finally, comparison is humbling as well as elevating. It is humbling since it makes people aware that there is no objective yardstick with which, for instance, universal stages of the development of government or rankings of less and of more advanced democracies can be established. Social reality is simply subject to interpretation. It is elevating when people sense that comparison will get them closer to unraveling the global, structural patterns in the development of government in contrast to the differences in the processes of governing between various cultures.

In this appendix we will discuss the importance of comparative studies in a world that is globalizing. This approach is very different from existing comparative studies. Some authors focused on comparing bureaucratic and political structures (for instance, Heady, 2001; Bouckaert and Peters, 2010).

Many concentrated on comparing public policies (for instance, Castles, 1998; Adolino and Blake, 2011; Krause and Smith, 2015) or public sector reform and change (for instance, Pollitt, and Bouckaert, 2000; Pierre and Ingraham, 2010; Kuhlmann and Wollmann, 2014). These types of studies are mainly empirical by nature and focus on the recent past and present, and compare individual countries. We know of at least one study that attempted to provide a conceptual map of comparative public administration and policy (Jreisat, 2002).

In this appendix we will first discuss the role and nature of comparisons in the social sciences (Section 2), followed by a section on the comparative aspect of the study of public administration. A separate section (4) is devoted to an overview of the development of comparative public administration from the beginning of the nineteenth century to the present.

The Function of Comparison in Society and in the Social Sciences

Often social scientists regard comparison as a method for developing generalizations about the social reality in which we live. Practitioners regard comparison as a method that helps improve their own activities, policies, instruments, and techniques by learning from "best practices" elsewhere. While the natural sciences are focused on universal "laws" (e.g., gravity, magnetism), the social sciences have to balance attention for that which is general and that which is unique. Hence, the natural sciences do not have a comparative element or approach, while the social sciences really cannot do without. This is certainly the case for the study of public administration. For instance, government and bureaucracy are global phenomena in terms of their overall structure, but how they function will vary with culture (see, for instance, Hofstede and others, 2010).

The nature and object of comparison in the social sciences has been debated often, and the intricacies of it have been nicely outlined by Czudnowski. His six observations about the use of comparative research clearly demonstrate the variety of opinions (1976, ch. 1). First, comparison can be regarded as a specific method alongside, for instance, the experimental, statistical, and case-study design (see also Lijphart, 1971, p. 682; Page, 1990, p. 439). Smelser pointed out that these four methods differ in their explanatory power (1976):

a. the methods vary according to the degree to which the researcher actually exercised empirical control on the sources of variation in the variables at hand; related to this,

b. the methods vary in the ease with which empirical control can be established by some sort of measurement; and

c. the number of cases and variables may vary. That is, when studying only a few cases, many variables can be considered, resulting in "thick description." When considering only a few variables, a large number of cases can be analyzed (large N).

All this relates to the second point Czudnowski made, which is that there are several methods of comparison that substantially differ from one another. This implies that general statements on comparison cannot be made. It follows, third, that there is no special method of comparison. In fact, each method is based on comparison. Research implies comparison. Scholars develop and use concepts for similar phenomena, and they often look for the extent to which these phenomena are similar or different. One of the fundamental requirements of research projects undertaken in the positivist mode is replicabilitiy, and that implies comparison. Fourth, Czudnowski also argues that comparison in the social sciences is often quantitative and represents as such a behavioristic approach. Statistical methods are then the most systemized type of comparison. It can be argued, though, that there are a lot of comparative studies that use qualitative methods. Fifth, some social scientists hold that a comparative method for a research project can substitute an experiment, although the outcomes are believed to be less precise than those of an experimental design. A final, sixth opinion about comparison that he lists is that it is impossible in the social sciences. Each system is unique, has its own culture, and interprets reality in its own way. This view is held by phenomenologists. We can also find, though, advocates of this idea among the constructivists. This view differs fundamentally from the other five since it rejects the possibility that the social sciences are able to provide general empirical knowledge.

Comparison as part of the pursuit of knowledge is of a very specific nature. More than a century ago the English scholar Edward E. Freeman argued in a series of lectures, published as *Comparative Politics* (1873), that the comparative method was the greatest intellectual achievement of his time (as referenced in Richter, 1968/69, p. 134). The promise of discovering universal laws through global and longitudinal comparison was hard to ignore in a time when "grand theories"' (Comte, 1830–1842; Darwin, 1859; Marx, 1859; Spencer, 1850) thrived. The challenge for the social sciences was to discover universal laws of society just as the natural sciences had done for the natural world. The idea that comparison in the social

sciences was a necessary step if they were to emulate the natural sciences prevailed throughout the first half of the twentieth century.

In the second half of the twentieth century scholarly attention turned more toward finding regularities and co-opted quantitative-statistical methods and mathematical modeling in that pursuit. However, qualitative studies did not disappear. In fact, they seemed to gain in importance from the 1980s on, if only to get a better understanding of how policies "played out" in different national and subnational settings. Esping-Andersen's book is an excellent example of a qualitative study that provides understanding of differences between types of welfare regimes, useful to both practitioners and scholars. Match that with Goodin and others' more quantitative study on different worlds of welfare capitalism, and we get a more complete understanding of this uniquely twentieth-century phenomenon.

Comparison appears to be firmly rooted in the social sciences as is illustrated by such journals as *Cross-Cultural Research: The Journal of Comparative Social Science* (since 1973), *Comparative Social Research* (since 1983), and *The Journal of Comparative Politics* (since 1969); as well as by such organizations as the Comparative Research Network led by scholars from Finland, Germany, the Netherlands, and Poland; and the Interdisciplinary Centre for Comparative Research in the Social Sciences based in Vienna, Austria; and by comparative research projects such as that on comparative local government systems in Europe led by professors Sabine Kuhlmann and Geert Bouckaert. What is the status of comparative studies in the study of public administration?

The Importance of Comparison in the Study of Public Administration

People have compared throughout the ages and so have their governments. For instance, civil servants copied from each other particular administrative techniques such as double-entry bookkeeping and particular organizational structures to facilitate a division of labor in government departments. While the study of law and of political science both had a tradition in comparative studies, such was largely missing in the study of public administration. Indeed, Robert Dahl observed: "The comparative aspects of public administration have largely been ignored." (1947, p. 8)

Are we in better shape more than 60 years later? Not if we are to believe one of the grand old men in comparative studies, Jean Blondel, who wrote: "If comparative government is valuable and indeed inevitable, why is the subject so little advanced and why does it raise so many difficulties and

controversies? Is it only that so many aspects are insufficiently explored? Or is it also that there are inherent theoretical difficulties—some even claim that the goal of a truly comparative analysis of government is impossible?" (1990, p. 5) Befitting the positivist and behaviorist approach to social science, Blondel's goal is the establishment of generalizations and regularities in the studies of politics and government. After all, politics and government are universal phenomena and activities (Blondel, 1990, pp. 3–4). There is, of course, a major difference between a "universal law" and a "regularity." Universal generalizations were the ultimate goal until the 1950s–1960s. Today scholars tend to settle for middle-range theories, although the hope for more general theories is not left behind. In the words of Blondel: "Middle range analysis can provide a basis for the development of comparative government, despite the fact that there is still no general theory of the relationship between norms, structures and behavior, of legitimacy, and of institutional development." (1990, p. 359)

Since public administration in the Anglo-American world has often been part of political science, separate definitions of comparative public administration do not really exist in those countries. Macridis argued that comparative public administration and comparative politics are the same. Both are focused on political action, state and state agencies, civil service systems, legislation, the executive, the judiciary, civic culture, and infrastructure of the political world (1968/69, pp. 80, 82–83). It is a view still popular as is evident in one of the few articles that specifically addresses comparative public administration (Page 1995, p. 138).

Such an approach to comparative public administration is not very satisfactory in countries where public administration has strong roots in the study of (state and administrative) law, as is the case in most of the continental European countries. In the continental European tradition there is much more interest for bureaucracy as the expression of legal-rational government (Weber, 1980; Pierre, 1995). Since the study of public administration is concerned with structure (particularly organization), functioning (particularly processes), and functionaries (Van Braam, 1986, p. 4), and since public administration has both descriptive as well as normative pretensions, *comparative public administration can be defined as the study of structures and processes in and ideas about*

a. governments as they exist around the globe,
b. relations between societies and their governments, and
c. the actual and ideal role and position of functionaries in these structures, processes, and relations.

Clearly the amount of comparative research has increased since the 1950s. The number of comparative books, however, is far larger than the number of comparative articles (Page, 1990, p. 445; Rose, 1991, p. 453). It is important to realize that some alleged comparative studies are not so much *comparative* as they are *comparable.* Comparable (often edited) studies present analysis of one phenomenon by several authors (for instance Page and Goldsmith, 1987; Dente and Kjellberg, 1987; Hesse, 1990/91; Rhodes and Wright, 1986). Single case studies in such journals as *Governance* or the *International Review of Administrative Sciences* also qualify as being comparable rather than comparative. Truly comparative studies are more often written by one or two authors.

What is the state of comparative research in the study of public administration? Looking at the quantity one could argue it is doing alright. Looking at the quality of many comparative publications, it is fine. But overall, comparative research suffers from being very fragmented in a geographical, substantive, epistemological, and methodological sense.

Geographical Fragmentation of Comparative Research and Understanding

Comparative research is geographically fragmented. Many small-N comparative studies are really single-case studies. Truly comparative small-N studies are often limited to a group of countries that are historically and geographically related, sometimes referred to as a "family of nations." With regard to the Western world scholars often limit themselves to, as Ferrel Heady called them, the "classic" systems of France, Germany, and the United Kingdom, with the United States and Japan added. In this book we have discussed why these classic systems are often included.

Meanwhile, a good example of a "family of nations" approach is the study by Castles and others (1993) of Western democracies where he distinguished between an Anglo-American family (Australia, Canada, Ireland, New Zealand, the United Kingdom, and the United States), the German family (Austria, Germany, and Switzerland), the Latin family (France, Greece, Italy, Portugal, and Spain), and the Scandinavian family (Denmark, Finland, the Netherlands, Norway, and Sweden). Painter and Peters include the same four, but then in a larger classification that spans the globe: Anglo-American, Napoleonic, Germanic, Scandinavian, Latin American, Postcolonial South Asian and African, East Asian, Soviet, and Islamic groups of countries (2010, pp. 17–19). Let these two classifications sink in a little, because at first glance they make sense. Closer inspection and consideration, however, reveal several shortcomings.

First, geographic proximity, linguistic similarity, and cultural comparability are lumped together rather indiscriminately. The Castles et al. classification is basically one of geographic and/or linguistic proximity. Intuitively it feels right that the Anglo-American countries are lumped together because English is the dominant language, but that is where it ends (see the following). The Latin group has in common that its languages are Romanic (except Greece), that its countries were occupied by Napoleon (except Greece), and that they border the Mediterranean (except Portugal). The Germanic family is obviously both geographically and linguistically linked, although it is unclear where the French- and Italian-speaking parts of Switzerland should be placed. Surprising is the positioning of the Netherlands in the Scandinavian group. Perhaps the Scandinavian and Germanic countries should be grouped together because of geographical proximity and the fact that they all speak Germanic languages (except some parts of Switzerland) and are all in Northwest Europe. However, with regard to the Netherlands, the so-called Napoleonic tradition of centralized government has left as much influence as the Germanic *Rechtsstaat* tradition (Raadschelders and Van der Meer, 1995). So, does the Netherlands fit better the Napoleonic/Latin tradition or the Germanic tradition? With regard to the Latin tradition, Ongaro found that labeling these as "Napoleonic" is not very useful since "the expression does not entail that there is any kind of 'Napoleonic' heritage affecting the broader form of the state." (2009, p. 7) Indeed, perhaps comparison should be focused on crafting carefully edited historical narratives that describe how the present came to be (Rouban, 2008). The reader will find more on this in Appendix 2.

Second, grouping countries as "families of nations" suggests a degree of comparativeness that at closer inspection does not exist. After all, culturally Canadians and Americans, for instance, are quite different people, as are Swedes and Norwegians. Another example is that one could study countries in the so-called Westminster tradition, but will then find that the development in various former British colonies has moved away from the initial British imprint and in quite a variety of directions (for instance, Patapan and others, 2010). In other words, at closer inspection the notion of "tradition" evaporates; it is a stereotypical shortcut to understanding, oblivious of national peculiarities, and certainly of subnational differences. In Germany, the state of Bavaria is quite different (Catholic) from that of Lower Saxony (Protestant); in the United States the Northeastern states that were settled by the British have a political-administrative tradition that is very different from that of the Southern and Southwestern parts that were settled by the French and Spanish, respectively (Elazar, 1966).

Third, and somewhat from a nationalistic point of view, the "family of nations" label is often modeled after one national example: the British and their Westminster system, the German *Rechtsstaat* system, and the French Napoleonic system. It just so happens that these three systems can be reasonably selected as "classic systems" (see Heady) but the reason why cannot be clear when the notion of "tradition" or "family of nations" looks at the contemporary world only.

This leads into the fourth problem with conceiving the political-administrative and cultural world in terms of "families" or "traditions." They provide a rather static representation of the world, lacking a historical perspective that helps understand why we find, intuitively, both the conceptions of "families" and "traditions" appealing. To really understand the world of today, we have to trace its roots into the past. The "why" of today's world will never make sense without such a temporal perspective. Furthermore, what may be a tradition now can be less relevant 20 years from now. How long do we expect that we can speak about the Soviet tradition? A couple of decades? We certainly no longer speak about the Roman tradition (i.e., the part of Europe occupied by the Roman Empire), or the Catholic tradition (generally Southern Europe), or the Protestant tradition (generally Northwestern Europe), even though the influence of these "traditions" is much larger in today's world than generally realized (for more on this see Chapters 2 and 3).

The fifth problem is that any classification of nations based on geography, language, and culture emphasizes singular and, more often, a mix of features. Geographic proximity and linguistic similarity are somewhat clear as selection criteria, but why do Painter and Peters include a Soviet and an Islamic category? The first is a political category encompassing a hodge-podge of countries whose connection is that they once were part of the Soviet Union. Does that mean that the three Baltic states are in the same category as the Kyrghyz Republic? We must ask this because culturally and economically the Baltic states have been much more oriented toward Germany, Sweden, and Finland. Now that we're on this, in which category would Central European countries (for instance, Poland and Hungary) and Eastern European countries (for instance, Bulgaria and Romania) be placed, or former Yugoslavia and Albania? The latter two were not part of the Soviet Union but they were communist. Perhaps we should have a category titled Communist countries, but that would include China, which, from a cultural of point of view, fits better with a category of Confucian countries (Burns, 2007). We are not even going to try and reason that out. The Islamic category is obviously based on a religious criterion, while

culturally the differences are quite significant. Indonesia, the largest Muslim country in the world, hardly compares to Iran with its more fundamentalist system of politics.

The sixth problem with this type of classification is that it leaves out much. As far as we know, all classifications of this sort are based on geographic, linguistic, and/or cultural features. Why is there no categorization from an economic point of view? In light of the globalizing economy, that would make sense. We suppose that the distinction between Western capitalist and non-Western, developmental could be one; industrial and agricultural could be another. But, then that would leave out the emerging and rapidly growing economies of, say, Brazil and India. The distinction between First, Second, and Third World is certainly no longer appetizing. Left out in the Painter/ Peters grouping is the Middle East. In a geographic and linguistic sense they are one, but where does Israel fit? In which category are we going to place the small island states of the Pacific Ocean—that is, Micronesia—given the fact that some have been influenced by the British, others by the French, yet others by the Spanish or the Portuguese traditions?

Seventh, the notion of "tradition" or "family" actually highlights that there are regional pockets of comparative research that do not often connect with research in other parts of the world. There is, for instance, a lot of comparative work done in the Nordic countries, as there is in sub-Saharan African and in Latin American countries. Especially, scholars in the latter part of the world seem to be disconnected from their colleagues elsewhere (see also next subsection). Exchange of information and research is more often dependent upon relationships between individual scholars than upon a substantive basis. This takes us to a second source of fragmentation with regard to comparative research.

Substantive Fragmentation of Comparative Research and Understanding

There are several ways in which comparative perspectives are fragmented along substantive and topical lines: Western versus non-Western comparative studies, comparative studies within the specializations of public administration, comparative knowledge about governments across the social sciences, and ethnocentric and linguistic barriers to comparative understanding.

First, there is clearly a difference between Western comparative administration and non-Western development administration. Naturally, it is believed that we can learn from one another, but it does seem that when it comes to comparative research, it appears that development administration

is perceived as learning from Western comparative administration rather than the other way around. In a really cynical mood one could say that there are very few Nigerian, Thai, or Argentinian consultants actively helping the European Union or NAFTA with some of its challenges. But Western consultants, as academics, as representatives and members of think tanks, and as civil servants, are frequently invited to reflect upon, discuss, and outline solutions for specific, often wicked, problems in developing world countries.

There are at least three reasons that exchange of comparative understanding is mostly a one-way street. First, former colonies in Africa and Asia received substantial development aid from their "mother" countries (Bivin-Raadschelders, 1995), including advice in institution building (for instance, how to incorporate indigenous governance traditions in a colonial system) (for more on this see Chapter 3). Therefore, there is something of a tradition with regard to exchange of information and experience. Second, members of the Comparative Administration Group (see more on them in the next section) wanted to study both Western and non-Western countries, but the Ford Foundation only provided funding for, as they called it, "development administration." (Riggs, 1976, p. 649) Especially, American scholars swarmed out over the globe, to help rebuild European and Asian countries after the Second World War, and to help fledgling new states after decolonization (Africa, southern Asia) and independence (Central and Eastern European countries) (perhaps we could label the latter process as one of de-Russification). Third, especially in the past 20, perhaps 30 years, multinational donors such as the International Monetary Fund and World Bank have been more and more insistent that developing countries should adopt Western-style reforms if they desire financial aid (Adamolekun, 1999; Farazmand, 1999). While understandable perhaps at some level (for instance: assuring that financial aid truly reaches the intended populations), at another level it is much less understandable. Thus, and from quite an unexpected corner, the organizational theorist Howard Aldrich observed decades ago that "innovations have failed when introduced into societies with nonsupportive cultural and institutional traditions." (1979, p. 22) We suspect that many a consultant will concur, but this insight does not seem to trickle upward to actually help redefine policy.

Is it so outlandish to consider the possibility that Western countries can actually learn from non-Western countries? One of the authors of this volume recalls reading Merilee Grindle's comparative volume about implementation in Latin America. Being "raised" in a Western, linear perception of policy making (from problem identification and definition, via identification of

alternative solutions, selection of most satisfying alternative, decision, planning, implementation, and evaluation), it was eye-opening to read about the extent to which implementation is much more central to the policy-making process than in most Western countries (1980, pp. 5–7) and that, consequently, the policy focus is much more on the output stage than on the input stage of the policy process (Grindle, 1980, p. 15). In view of the fact that several scholars have pointed out the limitations of linear conceptions of policy making, and suggesting that cyclical approaches may approximate reality better, it does seem that we can learn from experiences in the developing world.

A second reason for the substantive and topical fragmentation of comparative studies is basically reflective of the topical fragmentation in the study of public administration. This problem is significant in the United States where the study is generally presented as a string of specializations. In the more European and Asian traditions of the study it is more common to present comprehensive perspectives or frameworks (Raadschelders, 2011b). Ask the question though: How many specialists in budgeting, finance, and taxation have read Peters's 1991 comparative study of taxation, and how many have read Webber and Wildavsky's cross-time study of the same (1986)? Would specialists in human resource management (HRM) have the time and/or desire to read on comparative taxation? We can also ask: As central as HRM is to any political-administrative system, how many truly comparative studies exist that present differences and similarities of HRM practices across the globe? The closest we get are studies published under the auspices of the Organization for Economic Cooperation and Development (OECD). Yet another question: How many specialists in HRM are interested in delving into the extensive comparative literature on administrative reform, or civil service systems, or new public management trends, or performance management and measurement? And how many specialists in defense policy would be interested in comparative health care (Altenstetter and Björkman, 1997)? If scholars operate in compartmentalized worlds of knowledge, there is no reason to believe that practitioners are any different (Raadschelders, 2011b, especially Chapter 3). While we know that in the late nineteenth and early twentieth centuries American, European, and Japanese civil servants traveled to other parts of the world to learn about best practices, and while we know that such travel is still fairly normal for upper-level administrative officeholders, are these public officials aware of comparative studies relevant to their trip, i.e., to be read before their trip? Other questions are conceivable, but the point we try to get across is clear: Comparative studies are hindered by substantive and topical fragmentation.

A third source of fragmentation is that comparative knowledge about governments exists across the social sciences, but again, that knowledge is mainly accessed as a function of a particular interest. Thus, a public policy scholar interested in trends in economic policy may find some neoinstitutional economists inspiring (for instance, Douglas North, Oliver Williamson), while an HRM scholar might find more of interest in organizational sociology or in behavioral psychology.

A fourth and final source of substantive fragmentation is found in ethnocentric and linguistic barriers. Countries with which the authors of this volume are familiar (mainly Western Europe, North America, Southeast Asia, Western countries including Israel) often have a clearly defined national study of public administration (certainly in Western Europe and North America) or—at least—a study that is seeking to become more aligned to national, indigenous traditions. With respect to the latter situation (think of former colonies and the former Soviet countries), the case of the South Korean study of public administration is a good illustration. Many South Korean scholars received their education in the United States, and obviously, the Republic of South Korea was the recipient of much American aid in the aftermath of the Korean War (1952–1954). The South Korean study of public administration became something of a carbon copy of its American example, both in terms of substantive interest as well as in terms of favored methodological approach. It is only in the past 10 years or so that South Korean scholars have suggested that their study should be indigenized (Chung, 2007; Jung, 2001; Jung, 2014), and indeed, there is every reason to believe that the South Korean study can and should position itself intellectually and culturally as a system of Confucian governance (Liu, 1959, p. 213; Burns, 2007, pp. 72–73).

Another element or aspect of this ethnocentricity has to do with the domination of American literature in the study of public administration. This is not something that American scholars can or should be "blamed" for. After all, they are not translating their own hand- and textbooks in Chinese, Korean, French, or Spanish, just to name a few languages in which American hand- and textbooks have been translated. But, why has a Chinese textbook or one of the excellent Dutch, German, or French textbooks not been translated in English? (Raadschelders, 2009, p. 14) Could it be that such textbooks would not be used in, say, the English-speaking world because public administration scholars might find them not applicable in, for instance, the United Kingdom or the United States? If so, why are American textbooks considered relevant for understanding Chinese administration and its long and rich heritage of more than 2,000 years? (Balasz,

1957, 1959) Naturally, people, organizations, and institutions will never stop learning, but again, it is odd—to say the least—that American literature is so influential in other countries. It is especially odd because the American literature has very few references to non-American and non-English sources (Candler and others, 2010, p. 840), but this could be a function of the fact that American scholars generally will know their own system best and do not presume to be qualified using literature from other countries without understanding the cultural context in which it was generated (Raadschelders, 2011a, p. 148).

American influence in the study worldwide is partially a function of its effort and desire to help bring or revive democracy. American experience and scholarship introduced a system of judicial review in Germany and Japan in the late 1940s, created a federal system in Germany, and more recently, American experience with decentralization served as example for comparable efforts in South Korea (Jung, 2005, p. 421). Americans also imparted a specific outlook on and approach to scholarship in many countries (for more on this, see the next subsection), preferring empiricism, rationality, efficiency, quantitative-statistical analyses, and mathematical modeling.

Again, English-speaking (especially American) scholarship cannot really be charged with guilt when it comes to dominance. Up to four centuries ago the only scholarly language was Latin. In the course of the nineteenth century anyone who desired to study, for instance, physics or chemistry better become fluent in German, while someone interested in history, anthropology, or archaeology better be conversant in both French and German. To this day, several Italian scholars of public administration have mastered English, French, German, and Spanish, if only because they cannot otherwise become familiar with developments elsewhere. Until well into the 1960s, Dutch children in the nonvocational secondary schools at least learned English, French, and German, while several would also pick up five to six years of Latin and Greek. Several Israeli and Arabic scholars can easily access sources in each other's languages. Such multilingualism may be disappearing since, after the Second World War, the English language has become the *lingua franca* of the academic world. Thus, linguistically public administration scholarship written in languages other than English is not accessible unless a scholar takes the time to learn another language. Not all is lost, though. There are PhD programs and topics that require students to develop proficiency in one or more foreign languages, especially when that is regarded as an indispensable element of the toolkit a student needs to have in order to successfully complete a study of development aid (lots of

French literature), a comparative study of policy making, or a comparative study of indigenization of civil service systems in Africa, just to name a few examples. And that leads us to the third main reason that comparative research and understanding is fragmented.

Methodological and Epistemological Fragmentation of Comparative Research and Understanding

Comparative studies are also fragmented along methodological and epistemological lines. With regard to methodology there is a big gap between quantitative-statistical and qualitative or figurational approaches (see the following). The large N-studies are done on the basis of quantitative-statistical analysis of extensive data sets, hoping that the data are coherent and consistent. Less attention in such studies is given (a) to the societal environment in which an organization operates and/or a policy unfolds, (b) the collection rationale for data from different countries, (c) the concepts that underlie these statistical tools and techniques (Desai, 2008), and (d) the variety of interpretations to the study concepts and methods that various people from various cultures sustain. Reviewing the first two issues of the *Administrative Science Quarterly*, the economist Kenneth Boulding observed that "the principal danger of the [quantitative-statistical] method is that the investigator is so absorbed in analyzing data that he forgets entirely the situation out of which the data are abstracted." (1958, p. 16) He called this "data fixation," and half a century later it seems that this is even more of problem.

Qualitative or figurational studies pay close attention to the societal and historical environment and thus can provide in-depth and detailed understanding of elements/aspects of a political-administrative system. As mentioned above, much research of the qualitative bend concerns often one country, or a few related countries. There are several reasons for this. First, while quantitative studies can be done without knowledge of other languages, "thick description" is not possible without accessing sources in another language. Second, many public administration scholars will be most familiar with their own political-administrative system and even see them as better or superior to others in an (un)conscious manner of ethnocentrism. How many scholars are there who can claim to have the in-depth knowledge of *and* experience in (that is, "living the comparative perspective") another country than their own? Third, qualitative work takes time and money. It takes time to get to understand a particular system (that is, organization, policy, functionaries, and so on) before we can start

research. It takes money to go and settle somewhere long enough so that research can be done that is of the same quality as that which one did in the home country. Perhaps, though, the fourth reason is most important, and that is that comparative research by definition deals with huge numbers of different constellations of situational and institutional factors (Ostrom, 2005, p. 10).[1]

It seems to us that combinations of quantitative and qualitative work are not very common, but would most definitely be important for comparative studies. That this is possible is illustrated by the work on common pool resources management systems by Elinor Ostrom and many associates all over the globe.

The methodological gap between quantitative and figurational studies is in part fed by a conceptual difference between "science" and *Wissenschaft* that has epistemological consequences (Raadschelders, 2011b, 40–42; see also Almond, 1990; Blyth, 2011; Popper, 1973). For centuries *Wissenschaft*[2] was defined as an organized body of knowledge. In the course of the eighteenth century, and under the influence of David Hume's distinction between fact and value, the concept of "science" came to be more narrowly defined as a body of organized knowledge that is established according to specific methods and approaches and that focused on "facts" and assumed an objective reality that can be observed independent from the researcher's biases. This more narrow definition of science reflects and is relevant to the nomological frameworks and paradigms that exist in the natural sciences. Following the breathtaking breakthroughs in the natural sciences, various scholars came to believe that universal laws must exist for social phenomena as well, and so the call for a more scientific social science gained quite a following during the nineteenth and twentieth centuries. This is especially reflected in a preference for and use of quantitative-statistical methods and mathematical modeling when analyzing social processes in the belief that this is more scientific than, for instance, various postmodern approaches.

In the past two, perhaps three decades, scholars in various social sciences have come to question this limited approach to and definition of scholarly knowledge since it does not acknowledge that reality, and the

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[1] The concept of qualitative research does not quite capture its content as well as that of quantitative research. The concept of figuration was introduced by Norbert Elias in the late 1930s and refers to the fact that we can only understand social reality in terms of the planned and unplanned forces that emanate from the "ways in which people [are] bound together and by pressures that they place [. . .] on one another . . ." (Elias, 1987, p. 166; Linklater and Mennell, 2010, p. 388).

[2] The German word *Wissenschaft* is best translated as *branch of knowledge*.

perception of it, is socially constructed and that scholars do influence what they investigate (as, by the way, physicists by and large have accepted following "Schrödinger's cat," one of the famous thought experiments in the 1920s and 1930s). Presently it seems that scholarship is either created on the basis of "science" narrowly defined, or upon a broader definition of science. Is it inconceivable that comparative research and understanding would benefit from work that actually combines both, and that departs from the notion that we can know parts of reality more or less objectively, while we also acknowledge that reality is socially constructed to varying degrees? In other words, do scholars really have to make a choice for either extreme on the continuum of knowledge?

One more interesting and puzzling aspect of scholarship narrowly defined is that it seeks to establish epistemological boundaries. The current division of studies in the academy dates back to the middle of the nineteenth century when several German universities determined that bodies of knowledge had to be organized in disciplines. That worked quite well for a while, but it is interesting that natural scientists since the 1930s have increasingly moved toward interdisciplinarity (that is, many of the big questions in the natural sciences can only be answered on the basis of interdisciplinary research), while the social sciences seem to be moving more to disciplinarity even though their bodies of knowledge can less easily be demarcated from one another (see on this Raadschelders, 2011b) than is the case in the natural sciences. Public administration is by definition an umbrella study, serving as the natural home for all that research and knowledge about government that is generated in the various social sciences. One could then call it an interdisciplinary study (Raadschelders, 2011b), but a case can actually be made that the study of public administration, and so its comparative component, cannot help but include an a-disciplinary source of knowledge.

Inter- and a-disciplinary comparative study will also help to reconnect practitioners and academics. The most important and challenging problems in the social world that confront practitioners are "wicked problems." Traditional disciplinary approaches cannot be expected to provide an answer to these, simply by virtue of the fact that they seek to simplify a problem to a clearly demarcated, manageable, and thus analyzable level. Complex, "wicked" problems are multifaceted and therefore require an approach that draws upon multiple disciplinary knowledge sources, but also upon the input and experience from involved practitioners, citizens, etc. Complex social problems can be fruitfully addressed through an interdisciplinary approach (see Balint and others, 2011).

The Development of Comparative Public Administration

Comparison has always been regarded as important. In antiquity philosophers such as Plato and Aristotle, as well as the historian Herodotus, drew upon their comparative knowledge of the world as they knew it (Richter, 1968/69, p. 131). The same was the case with Ibn Khaldûn and his *Muqadimmah* published in 1366 (2005), and more generally with the *Fürstenspiegel* published during the late Middle Ages and Renaissance (for instance, Machiavelli's *The Prince*). More systematic comparative research of political and administrative systems emerged during the seventeenth and eighteenth centuries. This occurred especially in France and the German principalities, since these were systems where the state had become a "consolidated state," to use Tilly's phrase. Comparison was necessary in the late Middle Ages and the early modern times, since in many European countries Roman law existed along with customary law (Richter, 1968/69, p. 141). Jean Bodin compared on a massive scale, and Hugo Grotius, Von Pufendorf, Althusius, and Montesquieu all acknowledged their debt to Bodin's work (Richter, 1968/69, p. 144). Comparison was thus pursued both from a juridical/legal and an administrative science angle, and mainly for utilitarian reasons. For much of history comparison was pursued with an eye for usable knowledge of a very practical nature.

It is not until the ages of rationalism, Enlightenment, and the Atlantic Revolutions that comparison became driven by a need to unravel the assumed regularities of social change, following—in that pursuit—the leaps that the natural sciences had made and would continue to make with regard to universal laws in nature, much to the chagrin of some social scientists. Since the 1800s the development of systematic comparative study can be summarized in four accumulative phases (see Figure A1.1).

During the first phase, the 1800s to the 1850s, comparisons were mainly descriptive and utilitarian, and predominantly focused on law and political systems. The comparative notes in *The Federalist* can serve as an example, as can the early nineteenth-century studies of legal systems in Western Europe and of legal and political institutions in the United States. Upon the demise of absolutism and with the advent of attention for law and civil rights, attention shifted at the end of the eighteenth century to the analysis of constitutional structures and constitutional arrangements (Raadschelders, 1994, p. 117). The "rule of law" (*Rechtsstaat*) became an important subject of study and—as can be expected—especially so in the continental European states with their Roman law tradition. The study of public administration, which had been independent (think of Cameralism), now became part of

FIGURE A1.1. DEVELOPMENT OF SYSTEMATIC COMPARATIVE RESEARCH IN PUBLIC ADMINISTRATION

Period	Phase 1	Phase 2	Phase 3	Phase 4
1800s–1850s	Descriptive, utilitarian; focus on legal and political systems			
1850s–1940s	Ibidem + →	a) analytical and methodological approach b) evolutionary focus (explanation through grand theory)		
1940s–1970s	Ibidem + →	Ibidem + →	explanation through structural-functionalism and middle-range theory	
1970s–present	Ibidem + →	Ibidem + →	Ibidem + →	explanation through understanding; historical institutionalism

the study of state and administrative law. Especially in France and Germany, there was much attention for legal arrangements in adjacent countries.

In the second phase, between the 1850s and 1940s, two somewhat separate streams of research emerged, one with an analytic-methodological and another with a social-evolutionary angle. The object of study was still that of legal and political systems. Examples of work with a more methodological and analytic focus are those of John Stuart Mill on methods of comparison and of Max Weber on, for instance, the use of ideal types. Weber's method of ideal types and theories about rationalization received much attention from the beginning of the third phase; Mill's methods of agreement and of difference did not really make it into mainstream social scientific comparison until the fourth phase. The flavor of late nineteenth-century comparative scholarship is best appreciated in one author's own words:

> Our own institutions can be understood and appreciated only by those who know somewhat familiarly other systems of government and the main facts of general institutional history. By the use of a thorough comparative and historical method, moreover, a general clarification of views may be obtained. (Wilson, 1892, p. xxxv)

Woodrow Wilson was hardly interested in studying the evolution of American state and local government in the manner popular at Johns Hopkins in the 1880s (Hoffman, 2002). He was more captivated by "the grand excursions amongst imperial policies . . ." (as quoted in Hofstadter, 1974, p. 319). His 1892 study (initially 1889) shows that he did not mince words and that he looked for the unique elements of American government as well as for some of its roots in England, in medieval Europe, and in antiquity. In its time his work was methodologically rigorous and explicit in outlining a theoretical and normative framework. Unlike so many in the nineteenth century, Wilson used comparison to enhance understanding, not to add his own evolutionary theory to those that had been developed earlier.

Evolutionary theory was much more popular, though, and driven by the expectation that it would be only a matter of time (think of E.A. Freeman in 1873) before scholars expected to have discovered universal social laws. Global and longitudinal comparisons, being the greatest intellectual achievement, were considered the best vehicle to arrive at that point. With respect to social evolutionary studies we can think of, for instance, Auguste Comte's theory about the stages of intellectual development as indication for social change (from theological, to metaphysical, to positive stage) and Karl Marx's theory on the deprivation of the masses and the inexorable march toward socialist society. Especially the evolutionary approach to social change, teleological by nature and embracing a unilinear view of history, aimed at uncovering the major stages in the history of civilization and the presentation and selection of information, was guided by "grand theory."

Characteristic for nineteenth-century comparative research was a *stamp-flag-coin* approach (Peters, 1988, p. 7), also known as the *itemistic method* in which comparison of institutional details is pursued item-by-item (Lasswell, 1968/69, p. 8). Cross-national comparisons dominated (see Appendix 2) and focused mainly on national levels of government. The comparison was not only performed for theoretical reasons. Indeed, practitioners actively pursued information about "best practices" elsewhere.

Often information was collected elsewhere with a view on assessing its usefulness for the national administrative system. The civil service report written by Dorman Eaton (1881) for the U.S. government is an example. He spent time in London to study the Northcote-Trevelyan report of 1854 and its impact upon the British civil service. (On a side-note: He funded the trip himself.) Upon return he adapted their ideas to the American context (Raadschelders and Rutgers, 1996, pp. 84 and 87). Trips abroad to learn about best practices were common. Quite a few American practitioners

traveled to Europe to learn about the extent and structure of service delivery in an age where people demanded more government involvement (Saunier, 2003). Furthermore, many an American academic had received his doctoral training in Europe (Hoffmann, 2002). Japanese practitioners traveled all over Europe, copying elements of the British postal system, the French judicial system, the American primary school system, and the French and German army systems; the Bank of Japan was modeled after the Belgian example (Westney, 1987, p. 13). Not only did Japanese civil servants copy what they thought to be best practices, they also hired 2,400 foreigners from 23 different countries in Western Europe and the United States.

To our knowledge, middle- and higher-level civil servants still actively exchange practices and experiences with one another. Higher-ranking line officials (at the rank of director general, director) will be more interested in how particular policies are organized, structured, and implemented elsewhere, or in the extent to which a particular type of reform fits in their own national context. Middle- and higher-ranking policy bureaucrats are likely to pay more attention to the "fit" of a particular policy in their own national context.

Whether for intellectual or utilitarian reasons, the stamp-flag-coin approach is still important. Any comparative research project will have to "map" the topic in these descriptive terms. Nowadays much basic information is available through databanks and through the statistical yearbooks of various countries. Also, one can look for cross-national comparisons made by international organizations such as the OECD (*Public Management: OECD Country Profiles*) and by newspapers such as *The Economist*.

In the first half of the twentieth century comparative research was mainly limited to the study of state and administrative law. Public administration hardly existed as an independent study. In some countries, though, the study experienced a revival as a consequence of the growth of local government. This was especially the case in Germany, the United States, and the Netherlands. These local government studies laid the groundwork for what was to become modern public administration. And it was in local government studies that a comparative approach was again adopted (in The Netherlands for instance: J. In 't Veld, 1929).

The Second World War represented a watershed in the development of public administration. What increasingly bothered scholars in the twentieth century was that the methodological challenges to empirically falsify the grand theories of nineteenth century were monumental, if not impossible, to overcome. This motivated the development of "middle-range studies," the third phase. In the decades of the 1940s–1970s a more modest middle-range theory was pursued. This type of theorizing was rooted in carefully explicated

structural-functionalist conceptualizations. Prime examples of comparative work in that approach are the studies by, for instance, Shmuel Eisenstadt (1957, 1963) and by, more recently, Samuel Finer (1997). On both sides of the Atlantic the rather formal and mechanistic approach to public administration was left for more attention for the behavior of actors and of institutions. It was also acknowledged that constitutionalism was mainly limited to the Atlantic area, and that many countries were governed on a nonconstitutional (that is, nondemocratic) basis. The idea arose that government is a "system" and that the various institutions in that system are related to one another in terms of the functions they fulfill. In order to come to understanding, scholars now started to pursue grand taxonomies: a systematic classification of phenomena through defining concepts and the relations between concepts. The focus turned to the analysis of political-administrative systems both of the Western and the non-Western world (Eisenstadt, 1963; Wittfogel, 1957; Riggs, 1964; Heady, 1991). Comparative public administration dealt with political-administrative systems and, thus, with the "authoritative allocation of values;" hence the scholarly attention for policy making and implementation both in terms of its material (distribution and allocation of goods) as well as its moral dimensions (decisions about what is and what is not allowed). The emphasis was on institutions such as parliaments, political parties, and interest groups and so was mainly comparative political science.

In the 1960s and early 1970s a growing number of researchers became discontented with taxonomies since they resulted in rather static and descriptive studies. In these decades, the social sciences (especially in the United States) adopted a more quantitative approach, using all kinds of statistical techniques. The rapidly growing availability of computers was an important factor in this development, as this made it possible to handle large amounts of data in a quick and rather simple manner. Statistical procedures were used to approximate an experiment in situations where variations between cases could not be controlled empirically for practical or ethical reasons (Lijphart, 1971, p. 684). This quantitative approach was also used in methodological debates as an argument to strengthen the scientific claim of the social sciences.

The search for regularities continues into our own time. Since the 1970s it appears scholars are less concerned with developing social laws or law-like generalizations, but instead are much more focused on deep understanding. A more dynamic and exploratory approach is now embraced. From various angles scholars attempt to understand administrative and political life from its underlying social and economic dynamics at the national and international level.

In this phase, there was also growing attention for the concept of "development," especially with respect to the less developed world, as well as more attention for behavior and for informal rules. In the 1970s the early public administration was considered to be too ethnocentric. Scholars such as Riggs argued that Western models and concepts were not applicable to developing countries. Under the influence of the "Comparative Administration Group" (CAG), comparative public administration in the United States came to limit itself more and more to development administration (Van Wart and Cayer, 1990, p. 239). On the European continent comparisons remained within political science, while public administration mainly focused on national administrations. It was in that national context that institutional analysis experienced a revival in the 1980s. In the attention for development and change, for dynamics and statics in relation to the environment, scholars returned to their initial focus on political institutions and the state. This renewed interest in institutions has become known as neo-institutionalism. Neo-institutionalism continued into the 1990s.

While traditional comparative research focused on cross-national comparisons, since the 1970s other types of comparisons—such as cross-policy, cross-level, and cross-time analysis—became popular as well (see Appendix 2). Since the 1970s, and more so in the 1980s, comparative research of a quantitative-statistical bent was increasingly augmented by work of a more qualitative-interpretative nature (Collier, 1991, p. 8; Page, 1990, p. 440; Benoît & Ragin, 2009; Mahoney & Rueschemeyer, 2003), reminiscent of the dominant approach during the first two postwar decades.

MOTIVES, TYPES AND THEORIES, METHODS FOR, AND CHALLENGES OF COMPARATIVE PERSPECTIVES

Visiting another country/culture is quite like going to the zoo and looking at strange animals. People are delighted seeing something that is different from what they see in their own environment: They marvel at the different clothes and textile coloring, the taste of different foods, experiencing different habits and customs, but in the end, they can leave and just ponder the novelty of it all with curiosity satisfied. What is acquired when visiting another region or country is ordinary knowledge that often confirms existing stereotypes. That is, what people see, taste, and especially what they experience sooner confirms what they believe to know rather than elucidates and nuances, and perhaps even changes what they know. Visiting another country and its culture is also quite like watching TV. What people see and experience is not part of the day-to-day reality in which they live, it is just an escape from that reality. In other words, ordinary knowledge is not challenged or put to the test by visiting or watching some other place. Visiting another region or country or watching a program about it on TV inevitably invokes comparative observations, but these merely serve to satisfy a temporary, rather fleeting, curiosity.

Since Ancient Greece some people wrote down and published their travel impressions, which effort represents a more systematic type of reflection. Some of these travel diaries have proved invaluable for the formulation of ideas about politics (for instance, *Thomas Jefferson Travels:*

Selected Writings, 1784–1789), about foreign societies and polities (for instance, Ibn Khaldûn's *Muqadimmah,* 1366, or Alexis de Tocqueville's *Journey to America,* 1831–1832), and about the nature of the physical and biological world (think of Charles Darwin's *The Voyage of the Beagle,* 1839). Especially Darwin's observations are important in the context of this book not so much because they led him to redefine human understanding about the development of life on earth, but because his work is testimony to the benefit of a comparative perspective for organized knowledge.

What distinguishes ordinary knowledge from organized knowledge is that the latter is the product of scholarship. The knowledge created by scholarship is grounded in long, advanced, and systematic study of (aspects of) natural and social reality in the hope of expanding human understanding of that reality. Scholars are the source of organized, systematic knowledge, best captured in the German *Wissenschaft* and comparable concepts in the other Germanic languages (Raadschelders, 2011b, pp. 40–41). In the Romanic languages the similar concept is that of, for instance, the French *science* and still used in this pre-eighteenth-century meaning in all the Mediterranean countries. The Anglo-American concept of "science" refers to a more narrow understanding of organized knowledge in use since the eighteenth century, namely as knowledge that is created through the application of the scientific method.[1]

Comparative studies are one avenue through which knowledge is created, but as an approach it only exists in the social sciences and the humanities. It is not necessary in the natural sciences. Gravity and magnetism operate and are present in every time and context. Also, the language in which natural scientists communicate with one another is highly formalized (think of the periodic table of elements) and mathematized, and they do not need to speak the language of a colleague from another country. Scholars in the social sciences and the humanities do not have the luxury of a formal language, but they increasingly communicate in English, the *lingua franca* of the contemporary academic world. But beyond the question of the formal language in which scholars of the social sciences and the humanities communicate stands the aspiration to understand the meaning of our social and human life. Perhaps the utmost challenge in academic comparative efforts is to learn from other people/cultures/societies a generic truth

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[1] Even though there is no consensus about how exactly "science" should be defined (for seven different definitions see Bunge, 1996, p. 186), there is strong belief in the existence of a "scientific method" in the social sciences. Interestingly, a corresponding concept does not exist in the natural sciences (see Weinberg, 2001, p. 85).

about human nature and social life, beyond the language and other symptoms of one case. Comparative studies exist precisely because very different nations and cultures also share very similar policy problems and public administration challenges. In this appendix we explore several motives for comparative research. It is up to readers to decide which they find the most important. Next, what types of comparative research can be distinguished? Are there theories that concern comparative government as a whole? What methods are available to scholars interested in comparative knowledge? Finally, what are the challenges of pursuing comparative perspectives?

Motives for Comparison

Appendix 1 opened with the remark that people compare continuously in their day-to-day lives, whether they want to or not. Comparison is central to human behavior as a means to stratify, thus serving to establish a pecking order. Scholars use comparison for three, perhaps four reasons.

The most obvious and first set is *theoretical* and *methodological* motives. In the 1940s Dahl could still argue that comparative research was necessary in the search for at least general principles of wide validity (Dahl, 1947, p. 1). Although that motive of comparative research is mentioned less and less as the main goal, one could say that comparison is pursued in order to search for generalizations. In that sense Dahl's conclusion is still relevant:

> No science of public administration is possible unless: [. . .] (3) there is a body of comparative studies from which it may be possible to discover principles and generalities that transcend national boundaries and peculiar historical experiences. (Dahl, 1947, p. 11)

Note how carefully Dahl phrases his objective. A science (narrowly defined) of public administration cannot be possible without comparison, but comparison only "may" lead to the discovery of principles and generalities. In other words, there is no guarantee. The authors of this book agree that understanding the role and position of contemporary government in society is no longer possible without a comparative perspective. Societies and their governments are more intertwined than ever before. Whether a science of public administration is possible is not the object of this volume, but we do think that comparative knowledge will help people to better

understand the world in which they live. The origins and development of government as we know it, and of policies it pursues, have been traced in the various chapters throughout this book. We will find that some features of the structure and functioning of contemporary government transcend national boundaries, while other characteristics bear the traces of "peculiar historical experiences." In other words, comparison is an analytical tool that may help us understand the potential and boundaries of knowledge dissemination among nations and administrative agencies.

It is not likely that social scientists will find universal laws regarding government, let alone for social phenomena in general, and so grand theory is more than ever a remote dream in the social sciences. What is possible through comparative studies is the development of, as Robert Merton called it, "middle-range theory," a more modest objective that hopes for generalizations on the basis of empirical investigations of a specific phenomenon or of a related set of phenomena. Middle-range theories "lie between the minor but necessary working hypotheses evolved in abundance during day-to-day research and the all-inclusive systematic efforts to develop a unified theory that will explain all the observed uniformities of social behavior, social organization, and social change." Social science theories since the Second World War are of the middle range, and comparison helps in the effort to develop and test theory.

A second set of motives for comparative research is *utilitarian.* Comparative research helps practitioners and scholars learn about how more or less comparable institutions have dealt differently with the same problem. Many are the instances where particular actions (organizational and territorial divisions, legislation, and so on) have been copied by one country from another (see Chapter 3). In Appendix 1 several examples were mentioned of civil servants traveling to other countries in hopes of learning from best practices elsewhere and assessing the extent to which these could be adopted in their own country. These exchanges of experiences and possible imitation are voluntary, but just as frequent have been the instances throughout history where the adoption and imitation of administrative practices have been imposed by a conqueror or colonizer or strongly advised by international actors such as the International Monetary Fund (IMF) and World Bank (see: Raadschelders and Bemelmans-Videc, 2015, p. 339; more on imitation in colonial administration in Chapters 3 and 4).

A possible third reason could be the *legitimizing* or *sobering-up* motive of comparative studies. This reason is closely related to utilitarian reasons. When citizens are asked whether they would desire to live in another

country of their choice, most respond to have no such desire. The implicit and simple comparison, based on information from media outlets, generally comes out in favor of one's own country. Whereas the common psychological explanation of resistance to change (Watson, 1971) is applicable here, another explanation is the social construction of life for each and every one us, based on values, rules, and axioms that work in one society and not necessarily in others. This social construction of reality begins in one's early days of childhood and determines our mature life. The notion of "American exceptionalism" is a good example of an implicit comparison that serves to legitimize one's country. Initially the term referred to the United States being the first new nation (Lipset, 1979) as it was built upon a creed of liberty, egalitarianism, individualism, laissez-faire, and populism. In recent decades, though, its meaning appears to have narrowed to being a country beloved of God and in which people have high self-esteem. One commentator recently noted that perhaps "American narcissism" captures better what characterizes the United States today (Cohen, 2011). Cohen's commentary provides various comparative examples, as does Derek Bok's extensive analysis of several problems in the United States in comparison to other countries in his *The State of the Nation* (1996). In fact, both these authors use comparison to help sober up this inward-looking appreciation of all things American and show how in many respects (health care, incarceration, education levels, paternal leave, child support, poor relief, and so on and so forth) citizens in other countries are faring much better. We need to keep in mind, though, that differences in public policies are related to differences in political culture and institutional settings (Krause and Smith, 2015, p. 245). With that in mind, it is far more difficult to judge a domestic policy by the standards and contexts of other countries.

This leads into the fourth and possibly most important motive for pursuing understanding based on comparative inquiry: *cultural motives.* Comparative research will lead to both more appreciation as well as more founded criticism of the society in and political-administrative system with which one grew up. Comparison provides an antidote against the limited views that exist if one has only studied the national state and administrative system. Indeed, comparison serves to "counteract tendencies toward parochialism. . . ." (Fitzpatrick and others, 2011, p. 821). It will develop awareness that one system of government is not necessarily better than another, and that a comparison of whole countries makes little sense. Also, when people are open minded, comparison may very well lead to respect for and patience with how "things" are done elsewhere. Comparison, then, serves as a civilizing force. Comparative public administration is

an important part of the administrative sciences, although it is less pursued than we would expect (Fitzpatrick and others, 2011).

The theoretical and methodological motives for comparison are often grounded in the notion of a value-free and morally neutral social science that strives for objectivity. The utilitarian motive is also based upon the idea that practices from elsewhere can be adopted in one's own country, although this generally does not happen without some degree of adaptation. The legitimizing or sobering-up motive moves us even further away from value and moral neutrality. We compare to establish rankings, and these in themselves are value laden. The most removed from the desire for objectivity is any comparison pursued to civilize, educate people. This motive for pursuing comparative understanding can only show the relativity of values, customs, and habits.

That said, comparative knowledge gained from articles and books, and developed in a classroom setting, is certainly a start, but is no substitute for "living the comparative perspective;" that is, spending a considerable amount of time in another country. Next to the inclusion of comparative perspectives in every public administration course, students should be encouraged to participate in international exchange programs.

Theories, Methods, and Types of Comparison

Above we noted that comparison can be pursued for a variety of reasons. In practice this might often be a mix of those mentioned. Whatever it is that practitioners and/or scholars compare, they do so in the context of a theoretical framework and a specific type of interest. The object of this section is to briefly highlight these theories and types of comparison.

Approaches to and Theories in Comparative Public Administration and Governance

While the natural sciences enjoy the pleasure of grand or (somewhat) unifying theories, the social sciences have many middle-range theories and no grand theory. A grand or unifying theory addresses a specific set of related natural phenomena, and any of the specializations within a discipline will operate within the framework of the grand or unifying theory. This is also referred to as nomological framework (d'Andrade, 1986) or paradigm (Kuhn, 1996). If there is a candidate for grand theory in the social sciences at large it must be that of structural-functionalism as developed by

Talcott Parsons, who held that society as a whole is a function of its constituent elements. He tried to develop a general theory of society known as action theory. Parsons's approach would soon be regarded as too generalized and abstract, and Merton's more limited middle-range theory approach basically won the day.

The social sciences have many middle-range theories or second-order formal objects. The concept of *formal object* originates with Kant and refers to a set of theories and concepts that circumscribe the study of a material object. The *material object*—that is, reality as is—can only be accessed through rationality on the one hand and sensory (sight, hearing, touch, taste, smell) perception on the other hand. The natural sciences have formal objects that entirely encompass their discipline; for instance, the Standard Model in physics, the periodic table of elements in chemistry, and evolution theory in biology. This is then a paradigm or first-order formal object, because it demarcates a discipline as a whole. In the social sciences only second-order formal objects[2] (that is, middle-range theory) can be identified since sets of theories and concepts concern at best specializations and/or specific topics within a discipline or study.

The material object of the study of public administration is government in its manifold relations with society. To date, there is no set of concepts and theories that clearly differentiate the study from other studies and disciplines. Instead, public administration scholars draw upon whatever knowledge sources (i.e., disciplines, but also experiential knowledge in governmental agencies, etc.) available without being beholden to any of them. Public administration is an umbrella study, the natural home where knowledge about government-in-society, as generated in many other disciplines and studies, is connected. The study of public administration has many second-order formal objects mainly situated in its various specializations such as human resource management, policy evaluation, organization theory, inter-governmental relations, budgeting and finance, and so on and so forth. Comparative government or administration could be regarded as a special-ization in the study, but could also be seen as an approach relevant to any specialization in the study. With regard to the latter, and by way of example, there is a comparative study of taxation (Peters, 1991), comparative reflections upon human resource management (for instance, Beardwell and Holden, 1997), and several studies of comparative public bureaucracies (Peters, 1988; Farazmand, 1991; Page, 1992; Tummala, 2005). We prefer to

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[2] For a discussion of material objects and of first- and second-order formal objects, see Raadschelders, 2011b, p. 10.

consider comparative administration as an approach that enriches the under-standing of the phenomena studied in the study's various specializations.

Theories of and/or relevant to comparative public administration and governance can be mapped in two ways. First, they can be characterized in terms of their dominant approach or method; second, they can be listed in terms of specific research object. With regard to dominant approach or method Hague and others (1992) distinguished between case studies, statistical analysis, and focused comparison. Lijphart listed the comparative method next to the experimental, the statistical, and the case study methods (1971, p. 682).

We can also look at two examples of conceptual maps of political science that are relevant to public administration. Gabriel Almond argued in the early 1980s that political science had split along methodological and ideological dimensions. In terms of methodology he distinguished between those who favored a "hard science" approach (that is, "quants," mathematical modeling, econometrics, game and voting theories) and those who advocated a "soft," more descriptive approach. With regard to ideology he contrasted left- and right-wing scholarship. He characterized left-wing scholarship as reliant most on a soft approach, using thick description and political-philosophical studies. Examples include critical theory and authors such as Johan Galtung and Emmanuel Wallerstein. Right-wing scholarship is more neoconservative and there we can find on the hard side someone like Herbert Simon, and on the soft dimension someone like Max Weber.

Another example is Chilcote's listing of three approaches to comparative politics that, like Almond's matrix, only concerns the twentieth century (see Table A2.1). The traditional approach seems to fit best the "stamps-flags-coins" approach mentioned in Appendix 1, but goes beyond in view of its prescriptive and normative aspirations. The attention for formal institutional arrangements is reminiscent of the nineteenth-century focus on law. Before the Second World War most comparative studies focused on countries in the Western world, but unlike what Chilcote claims, the focus was on both individual countries and several countries. Chilcote's behavioral approach compares best with the top row in Almond's matrix and befits the positivist stream in the social sciences. Interestingly, the postbehavioral column aligns best with the bottom row in Almond's matrix. The bottom left corner in Almond's matrix is echoed in Chilcote's change-oriented scholarship that operates upon notions of class conflict and relations. The bottom right corner of Almond's matrix returns in Chilcote's characterization as that postbeha-vioral research is holistic, historical, and macro-oriented. This suggests that Max Weber's type of work is back in fashion.

TABLE A2.1. TRADITIONAL, BEHAVIORAL, AND POSTBEHAVIORAL APPROACHES TO POLITICS

Traditional Approach	Behavioral Approach	Postbehavioral Approach
Interrelates fact and value; speculative	Separates fact from value	Fact and value tied to action and relevancy
Prescriptive and normative	Nonprescriptive, objective, empirical	Humanistically and problem oriented; normative
Qualitative	Quantitative; usually based on survey data	Qualitative and quantitative
Concerned with (ir)regularies	Concerned with uniformities, regularities	Concerned with (ir)regularities
Configurative and noncomparative; focus on individual countries	Comparative; focus on several countries	Comparative; focus on several countries; interdisciplinary
Ethnocentric; focus on Western European "democracies"	Ethnocentric; especially concerning Anglo-American model	Especially third-world oriented
Descriptive, parochial, static	Abstract, ideologically conservative and static	Theoretical, radical, change oriented
Focus on formal structure: constitutional, governmental	Focus on formal and informal (group) structures and functions	Focus on class and group relations and conflict
Historical or ahistorical	Ahistorical	Holistic, historical, and macro-oriented theory

Source: Chilcote 1996, p. 56

A second way that theories relevant to and/or in comparative adminis-tration can be mapped is by their subject matter. Thus, there are theories about the emergence of the early state (Chapter 2), about the dissemination of the Western state system across the globe (Chapter 3), about state making

and nation building (Chapter 4), about intergovernmental relations (Chapter 5), about bureaucracy (Chapter 6), about organization and management (Chapter 7), and about political-administrative relations and elite theories (Chapter 8). There are also many, many theories concerning the nature of and development in specific policy areas (Chapters 9 to 12); for instance, about the development of traditional government functions (Chapter 9), taxation (Chapter 10), industrialization (Chapter 11), and welfare functions (Chapter 12). These and many other theories will be mentioned, and sometimes discussed at some length, in the various chapters listed.

There is one specific set of theories relevant to comparative government as a whole, such as stage theories. Some theories mentioned above concerning specific topics of interest to comparative research are stage theories, such as, for instance, the emergence and development of the early state, state-making and nation-building theories, and theories about the development of political-administrative relations. Other stage theories include attention for the development of the Western legal system, of civil service systems, of local government, of politics, of warfare and state organization, and of industrial capitalism (see for these, Raadschelders, 1998, pp. 79–83). When relevant to the topic of a specific chapter, these too will be briefly discussed.

Three Basic Methods of Comparison

Vital to comparative research is the determination of what we are comparing, and all of the methods can be grouped into three main categories. Two of these were first distinguished by John Stuart Mill: the method of agreement and the method of difference (1930, p. 256). Both are methods of elimination that somehow must tackle the central problem of plurality of causes and intermixture of effects (Mill, 1930, p. 285). Mill argued that sociology (and we suggest, by extension, the social sciences) cannot be a science of positive predictions, but only one of tendencies. We can never be certain how a particular cause will operate in a particular context. In his words "we can seldom know, even approximately, all the agencies which may coexist with it, and still less calculate the collective result of so many combined elements." (Mill, 1930, p. 585) Fritz Scharpf captured the problem of comparative research in similar terms: "For comparative policy research, this means that the potential number of different constellations of situational and institutional factors will be extremely large—so large, in fact, that it is rather unlikely that exactly the same factor combination will appear in many empirical cases." (1997, p. 23; as quoted in Ostrom, 2005, p. 10)

The third category is the so-called configurational method. We will discuss these three below. Before doing so one remark needs to be made, and that is that we have to be aware of the challenge of selecting the level and unit of analysis: people, professionals, citizens, policies, institutions, agencies, structure, nations, municipalities, etc. In this book we did not make that choice and instead opted to address the world of government in its entirety.

Many studies in public administration suffer from what Lijphart (1971, p. 686) calls the "many variables, small N" problem. The research question at hand results in a study in which just a few cases have to be examined on many aspects, so that afterward no conclusion can be drawn on (causal) relationships between those variables. When for example two governmental agencies differ in their growth and also in their organizational form, size, policy field, budget, and clientele, it is not possible in this design to attribute the growth difference to any of the other variables. To solve this problem, one should either increase the number of cases as much as possible or carefully choose a strategy to handle the variation. It is often not possible to increase the number of cases due to restrictions in time, money, and the availability of information. With respect to the strategy concerning the variation in relevant aspects, two basic designs can be distinguished: the *most different systems design* (MDSD) and the *most similar systems design* (MSSD) (for instance, Przeworski and Teune, 1970; Lijphart, 1975; Frendreis, 1983).

In a nutshell, the idea behind these two methods is to either create as much difference between cases as possible apart from a few well-chosen variables, or reduce such differences as far as possible except for a few variables. In the first strategy (MDSD) one should look for similarities between cases as these provide clues concerning relations between variables, while in the latter (MSSD) these clues can be found in the differences between cases: "The logic of each design is to isolate relationships between variables by eliminating 'nuisance' or extraneous variables, or in causal terms, to isolate causal factors by eliminating competing variables as possible causes." (Frendreis, 1983, p. 260) In an MSSD study, the researcher maximizes the number of characteristics that the systems (cases) have in common and tries to minimize the number of characteristics on which these systems differ. In other words, systems are selected that are similar on as many independent variables as possible, with the exception of the phenomenon that is studied (either a dependent variable Y or a dependent relationship). The logic behind such a design is that while the cases are different regarding the dependent variable but are similar on any of the independent variables, differences in the dependent variable cannot be attributed to any of these controlled variables. It is slightly confusing,

but the MSSD design is also known as Mill's *(indirect) method of difference* (Ragin, 1989, especially Chapter 3).

In an MDSD, cases are selected that do not differ in the phenomenon under examination (that is, the dependent variable Y), but are as different as possible on all other characteristics. As possible causes for the dependent variable, all those variables are eliminated on which the cases differ. Frendreis cites Przeworski and Teune (1970, p. 35) to clarify the logic behind it: "If rates of suicide are the same among the Zuni, the Swedes, and the Russians, those factors that distinguish these three societies are irrelevant for the explanation of suicide." The MDSD design is also referred to as Mill's *method of agreement* (Ragin, 1989, Chapter 3).

For a comparative study, the researcher can make a deliberate choice for either the MSSD or the MDSD. Several considerations play a part in this choice, of which the research question at hand and thus the type of study is the most important. For an explorative study it is most fruitful when cases differ in the central phenomenon selected for study (as a dependent variable or a dependent relationship). Any concomitant variation in some independent variable could be an indication for a causal relationship, thereby providing an interesting starting point for further research. To be able to select such interesting variables, the differences between cases in the independent variables should be minimized. The basic strategy would thus be one in which similar systems are compared, hence an MSSD. (To be sure, covariation between two variables is never a proof for a causal relationship, only a necessary condition, and in an exploratory context merely an indication.) Should there be no variation in the central phenomenon, the search for concomitant variation in the set of independent variables in an exploratory study is useless.

In case of a study in which a clear hypothesis is formulated and tested, an MDSD is advisable. The hypothesis is tested in systems that are as different as possible, thereby using a test that is as severe as possible. The idea behind this is that when, for instance, it is argued that in general there is a relationship between two variables, we should check whether this relationship holds in all kinds of circumstances or systems as well as whether they hold across time. Therefore, the researcher selects cases that are the same with respect to the central phenomenon but differ in all other respects. One cannot falsify the hypothesis when the predicted relationship is found in all cases.

Other considerations that play a role in the choice between an MSSD and an MDSD are more pragmatic: Time, money, and the availability of data almost always have an influence on the research design (see the following).

As an MSSD is often more flexible than an MDSD, and only a few studies are aimed at the explicit testing of a hypothesis, most researchers in one way or another choose an MSSD. The prime example is comparative research within a so-called "family of nations" approach (see Appendix 1). In a sense one could call MSSD and MDSD methodological ideal-types, used to clarify the logic behind comparative research. Moreover, the considerations mentioned so far are relevant in situations with few cases. When we have a large N, a quantitative-statistical approach is possible and advisable. Controlling for variations in either the independent or the dependent variables is done using techniques like multivariate regression analysis.

The configurative approach is most fitting for single-case or small-N comparative research. As it has been briefly characterized in Appendix 1 (see footnote 1), this need not be further elaborated in this chapter.

Types of Comparisons

There is yet another way that comparative research can be conceptualized and that is by looking at *what* is being compared, and *how* is the comparison made.

What is being compared? What we compare are seldom individuals and individual behaviors. We compare sociopolitico-economic-cultural systems or components of these. In the literature, comparative politics (political science), comparative public policy (both in political science and in public administration), and comparative government (mainly on bureaucracy and civil service systems and generally in the study of public administration) are often separated. As noted in Chapter 1, we find this an unfortunate circumstance since any separation of politics, policy, and bureaucracy (including management) only serves analytics and is, as far as understanding and describing reality are concerned, artificial and not very useful to practitioners who make policy in a bureaucratic organization that is embedded in a political system. That said, we do not seek to identify what is being compared on the basis of these three substantive and organizationally defined distinctions, but on four solely substantive differences.

These four substantive foci of comparative research have been highlighted by Peters who has distinguished between, in this order, cross-national, cross-time, cross-level, and cross-policy comparisons (1988, pp. 3–7). Each of these will be briefly discussed but in the order of their emergence in the study of public administration.

Cross-national research has dominated the study since the beginning and still does. It often includes what Heady called the classic systems:

France, Germany, Great Britain, the United States, and (sometimes) Japan and Russia (2001, p. 89 and following pages). The politico-administrative systems of the first three countries have influenced other systems throughout the world through occupation, diffusion, and colonization (for more detail see Chapter 4 especially). Since Macridis published his study (1955) many more comparative studies have seen the light of day (Page, 1990, p. 440). However, leading comparativists such as Heady (1990, p. 29), Page (1990, p. 445), and Rose (2001, p. 453) have demonstrated that three-quarters of the cross-national journal articles really concern one country only. The number of comparative books is by far larger (Page, 1990, p. 445). Cross-national research will remain an important element in comparative research, especially in an internationalizing and globalizing world. Many policy problems have developed cross-national (or, perhaps better, international) proportions, in the sense that they cannot be solved by individual governments. Obvious examples are pollution and environmental policies, global warming, trade and currency, and so on (Rose, 1991, p. 461).

Cross-level analysis did not draw attention until the 1980s although various researchers repeatedly lamented this (Ashford, 1975, p. 90). Attention to it mounted in the context of increasing interdependencies between central and local governments (Dente and Kjellberg, 1988; Page, 1991; Page and Goldsmith, 1987; Rhodes and Wright, 1987; Toonen, 1987) and between national governments (including sometimes subnational governments) and supranational organizations (Toonen, 1990). Cross-level research also includes comparative cross-national studies of subnational government at the regional (for instance, Bullmann, 1994; Jones and Keating, 1995) and at the local levels (for instance, Hesse, 1990/91; Denters and Rose, 2005; Kuhlmann and Bogumil, 2007).

Much cross-time research can of course be found in the historical discipline, where researchers appear to favor the medieval and early modern periods. Cross-time analysis in public administration appeared to be on the rise from the second half of the 1980s onward (Raadschelders, 1993, 1994, 1997, 1998, 2010) and is mainly focused on the nineteenth and twentieth centuries. An excellent example of cross-time studies limited to the modern period is the *Jahrbuch für Europäische Verwaltungsgeschichte* that was published between 1989 and 2008 by publisher Nomos Verlagsgesellschaft in Baden-Baden. Each of the 20 volumes was dedicated to one specific topic of interest to historians, legal historians, political scientists, and public administrationists. This period has immediate relevance for understanding contemporary government, since it was from the French Revolution onward that the foundations for modern government were

created (for more see Chapters 3 and 4). The idea that historical developments ought to be analyzed not only to understand current structure and functioning of administration but also to know the range within which solutions to problems can be pursued is captured in the fashionable concept of *path-dependency* (Krasner, 1984, 1988; also Raadschelders, 1998; Kay, 2005, Chapter 3, 2006).

Finally, cross-policy comparison gained momentum in the context of the crisis of the welfare state and is therefore dominated by attention for policies characteristic of the welfare state (health, education, employment, social insurance, and so on; see, Ashford, 1992; Fried, 1975; Flora and Heidenheimer, 1990; Goodin and others, 1999). However, this type of comparison is of a somewhat different nature than the other three, as it does not so much characterize the *nature* of the comparison but rather the *content* of it. We therefore adapt Peters's classification. In our view, a study can be characterized on three dimensions of comparison: cross-national, cross-level, cross-time. Each dimension can be seen as a question: Is this study cross-national, is it cross-level, is it cross-time? Combined, these result in eight main types of comparison (Figure A2.1).

In a type 1 study the research concerns one moment, one level, and one case. An example would be a comparison of the public expenditures on transport with those of public education. Depending on the subject, it might

FIGURE A2.1. MAIN TYPES OF COMPARISON

		cross-time			
		no		yes	
		cross-level		cross-level	
		no	yes	no	yes
cross-national	no	1	2	3	4
	yes	5	6	7	8

also be a study that has no explicit comparative aim at all: The classical descriptive case-study might serve as an example. The other extreme is type 8. This would be rather complicated research in which all three classes of comparison can be found. This may be easier to do for a study of the comparative approach in public administration in general (and of which we believe this book is an example) than for an empirical work. With respect to the fourth category of Peters (cross-policy comparison), one could say that in the studies of public administration and political science, this is a dominant group of studies, but all cross-policy studies can be classified in terms of what is compared in one or more of the eight types listed in Figure A2.1. This book provides cross-national, cross-level, cross-time, and cross-policy comparisons.

How is comparison pursued? Classifications of how comparisons are conducted are much less noticed. In an interesting article Skocpol and Somers (1980) distinguished among three types (see also Collier, 1991, pp. 11–12). In comparative research as a *parallel demonstration of theory* the researcher uses existing theory for new cases. It thus serves as an illustration of such a theory and does not validate theory. The example they mention is Eisenstadt's 1963 study of political systems over time. Comparative research can also be pursued to illustrate the unique features of each system. If that is the case, then the researcher is *contrasting contexts.* This type of analysis, however, does not lead to development of theory. The example given by Skocpol and Somers is Bendix's 1964 study of nation building. The third type they labeled *macrocausal analysis.* In this case the aim is to generate and test hypotheses through systematic examination of covariation among cases. The prime example, again according to Skocpol and Somers, of such a study is Barrington Moore's work on democracy and dictatorship (1966).

Challenges of Comparative Research

Some argue that comparative research is impossible since every country has its cultural idiosyncracies. In the view of the pessimist a comparative analysis is at best superficial, and that meaningful comparisons are not possible because of differences in how government functions in each country. However, it is exactly because those differences in functioning "play out" in the context of a structure that is fairly similar (see Chapters 4 to 8 on this) that advocates of comparative research argue that ample attention should be given to how the administrative heritage of a country influences

government organization and functioning today (Heady, 2001, p. 153). Both groups of scholars agree that we need to be aware of problems of comparative research, and these can be grouped in four main types:

1. conceptual, linguistic, and semantic problems;
2. theoretical and methodological problems;
3. research technical problems; and
4. application problems.

We start with concepts, because neither problems of theory, model, or method, on the one hand, nor mere technical and application problems, on the other hand, can be discussed and developed without some clarity about what we investigate. This is particularly important in comparative perspectives and studies.

Conceptual, Linguistic, and Semantic Problems

In daily experience people tend to translate a word into another language without much thought about whether the actual meaning of a concept transfers as easily from one language to another. What appears trivial in day-to-day context turns out to be a trying test in research. Administrative scientists are faced with a trilemma of problems (Rutgers, 1994, 1996). First, administrative science is written in numerous natural languages. There is no equivalent for the English concept of "policy" in German, French, or Dutch. Second, administrative science deals with various cultures of governance. What appears to be one concept may hide various meanings. "Federalism" is an obvious example. In Germany federalism is mainly regarded as an administrative technique, while in France it is associated with the supra-nationalism of the European Union and sooner perceived as a threat to the national, unitary state. In the United States federalism is equated with centralism, where the federal, national state is positioned as overbearing vis-à-vis the states of the union. A civil servant in Great Britain is (supposedly) more of a generalist who is part of a merry-go-round career pattern, while in France and Germany they are specialists with fixed career paths. And finally, administrative science deals with various academic lingos. Countries may use different concepts for essentially the same phenomenon. Thus "decentralization" (as used on the European continent and North America) and "devolution" (as used in the United Kingdom) are synonymous in content. Another aspect to this phenomenon of different academic lingos is related to the fact that administrative science seeks to integrate knowledge

and insights from various disciplines with respect to public institutions. The general conclusion from these three problems is that the administrative sciences (and the social sciences in general) lack a universal language, that we have to be aware of possible national biases in the theoretical framework developed for comparative research projects, and that we have to be aware of possible disciplinary biases in comparative research.

A different way of understanding the conceptual, linguistic, and semantic problems of comparative research is hidden in the distinction between the *intension* and *extension* of concepts (Sartori, 1970, p. 1041; Collier, 1991, p. 18; Nuchelmans, 1974, pp. 22 and 33–34). The intension of a concept (connotation) concerns the collection of properties constituting a concept or, in more popular terms, the contents. The extension of a concept (denotation) concerns the class of phenomena (i.e., totality of objects) to which a concept applies, hence the scope, the range of cases referred to.

This may be illustrated by *the chief executive* and *the president*. Both denote the same office or person, but they connote different characteristics. The classic example in semantics is "the morning star" and "the evening star." Both denote the planet Venus but have different connotations as they are applicable to different occasions (i.e., a phenomenon visible in the morning or in the evening) (Rutgers, 1996, p. 15). According to Sartori one can climb the level of abstraction in two ways. One can broaden the extension of a concept by reducing its properties (reducing the connotation) so that a more "general" concept is created without loss of precision. One can also increase the extension of a concept without diminishing the intension. This he labeled *conceptual stretching*. To clarify this, consider Figure A2.2 in which

FIGURE A2.2. NUMBER OF PROPERTIES AND PHENOMENA
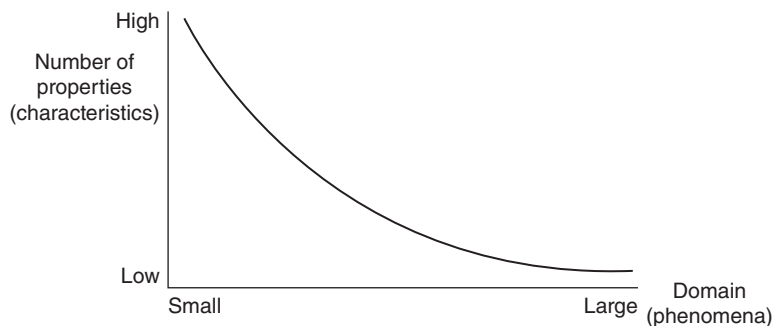
FIGURE A2.3. LEVEL OF ABSTRACTION
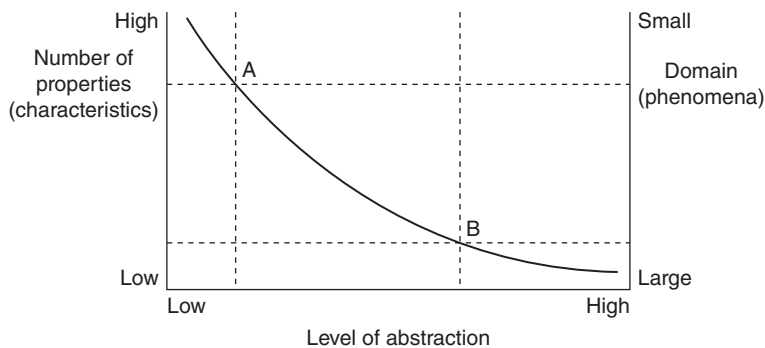
the relationship between the number of properties or characteristics and the domain is reflected.

The more characteristics are specified, the fewer cases it applies to. Conversely, the larger the domain (that is, set of objects), the fewer the number of characteristics. If, for example, we define politics in the Lasswellian sense as "who gets what, when and how," we specify few characteristics, and hence this refers to a large set of phenomena. Should we, however, formulate a more strict concept, say: "Politics is the formal decision making in any authorized representative body such as a parliament or city council," then this refers to a smaller set of objects as the number of characteristics is larger. In fact, the set of objects under the latter definition is a subset of the domain under the former (Figure A2.3). The relationship between the number of properties, the number of phenomena and the level of abstraction is depicted. The curve shows that a large number of properties corresponds to a rather concrete level of analysis and a small number of phenomena. Point A reflects such a definition. Vice versa, a large set of phenomena implies a high level of abstraction and a small number of properties. Point B is a definition of this type.

The first route that Sartori describes to climb (or descend) the ladder of abstraction basically means shifting positions on this curve. It makes one aware of a choice that must be made. The inappropriateness of the second strategy can now easily be seen: One cannot seek a higher level of abstraction, and thus a larger class of phenomena, while simultaneously leaving the number of phenomena unchanged. You can't make an omelet without breaking a few eggs, to put it domestically. When the extension of a concept

is enlarged by reducing the number of properties (that is, characteristics) so that more phenomena can be included in a concept, the quality of the concept as an analytical tool is preserved. When, however, the extension of a concept is stretched without reducing the number of characteristics, one basically uses a concept as a garbage can. In that case the analytical qualities of the concept have been sacrificed. It will be clear that this is not acceptable from a scholarly point of view.

As is to be expected, the risk of conceptual stretching is especially large in comparative research that seeks to encompass both Western as well as non-Western countries. Based on an accepted dichotomy in philosophy Rutgers (1994) distinguishes *authentic meaning* from *meaning ratio* of concepts. This helps us to develop a more refined understanding of linguistic problems. The authentic meaning of a concept is related to a specific time and place. We will acquire knowledge of a particular local/national problem, but we will not be able to establish whether—in the case of comparative research—our premises for various cases are of the same order. Conclusions can hardly, if at all, be generalized. When we use meaning ratio as our point of departure for comparative research, we can arrive at generalizations, since we use one framework (such as an ideal type) to interpret and compare various cases.

Theoretical and Methodological Problems

Some of the conceptual, linguistic, and semantic problems spill over into being a theoretical and methodological challenge. Above, we already noted that a civil servant is a very different concept in France, in Germany, and in the United Kingdom. We also need to pay careful attention to what can be quantified, and even whether we do need to quantify.

The Meaning of Concepts Those who argue that the intension and authentic meaning of concepts are specific concur implicitly with Kuhn's idea of incommensurability, while those who defend extension of concepts and meaning ratios might feel more comfortable with Popper's "myth of the framework." Kuhn and Feyerabend argued that concepts and theoretical frameworks developed for empirical research of a specific case and/or in a specific place may not so easily be transferred and used in a different context. Hence, when time and context obviously must differ from case to case and from place to place, each case or place requires a theoretical framework of its own. In other words: The concepts developed in a particular theoretical framework derive their meaning from that framework, and

cannot be transferred to a different theoretical framework.[3] This is closely related to some of the problems discussed above.

The other position has been voiced by Karl Popper, who defended the possibility of transferring concepts from one framework to another. He labeled the idea of incommensurability as a "myth of the framework." In comparative research it is common that concepts developed for a particular research in a particular country/culture are used in later projects. Replication is an immanent criterion for science. It is a necessity in any empirical research that seeks extension of theory, findings, and implications. This is especially the case with research that seeks to replicate findings of earlier research. Public administration researchers position themselves, usually implicitly, in the Kuhn/Popper debate. In most cases, researchers do not include a formal statement on this subject, but rather show this position by the research design that is used. Therefore, a major problem (and challenge) of many comparative studies in our study is the allocation of a reasonable number of cases (much beyond the case-study orientation of many administrative problems) and the capability to look for variance in a particular variable/concept that is equally measured by others who conducted similar previous studies on the same problem.

From this it follows that it is important to explicitly choose a key concept or set of concepts from which the comparison is pursued. The researcher should select concepts that render meaning in different cultural contexts. Choosing the ideal typical method may be helpful, in the sense that an ideal type "hovers" above (or next to) reality. The development of a theoretically meaningful classification is imperative.

Problems of Statistical Research In comparative government research, experiments such as those conducted in, for instance, cognitive psychology cannot be done. Instead "we can use the experience of other nations to provide what may be regarded as 'natural experiments'" on the basis of a most similar systems design (Castles, 2000, p. 13). When using statistical

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[3] Keep in mind that Kuhn's analysis mainly concerned the natural sciences, and that both he and Feyerabend were very careful in pointing out that the applicability of their ideas in and for the social sciences was unclear, to say the least. Kuhn's incommensurability thesis was criticized by Bunge (1996, p. 118) as being analytically and historically false. Analytically, because only theories that concern different domains are incommensurable; historically, because rival theories have coexisted. Furthermore, an older paradigm (for instance, Newtonian mechanics) is still valid in the context of a newer paradigm (for instance, quantum mechanics) but then under stricter *ceteris paribus* conditions.

data, comparative researchers are confronted with several challenges. The first challenge concerns the representativeness of the sample. Research in comparative government is always limited in terms of the number of cases that can be investigated. Selecting 21 cases, Castles noted that sample-representativeness was a challenge given that probabilities generally rely on much larger samples (2000, p. 18).

The second challenge involves the choice between studying one or a few variables in many cases versus multiple variables in relatively few cases. The former amounts to a reduction of the complexity of reality, but allows for modeling. The latter provides a better reflection of reality, but will not allow for modeling.

A third challenge concerns the quantity and quality of the data collected. With regard to quantity, the question always is whether a sufficient and reliable set of indicators is available. However, what determines sufficiency is open to questioning. As for quality, in view of cross-national variations in conceptualizing social phenomena (for instance, civil service, bureaucracy, corruption, and so on), it is vital that a determination is made about how comparable the data really are so as to make sure that we are not comparing apples and oranges. This problem is especially present in research that employs secondary data that are collected by someone else or some other institution. For instance, the OECD, the IMF, the UN, and various survey organizations make data collections available to researchers, but the latter do not often explore the collection rationale of the dataset. It is thus desirable to develop one's own dataset, generating primary data. In either case, the challenge of avoiding a selection bias (that is, countries selected, type of data collected) is huge (Hague and others, 1992, p. 38).

A fourth challenge concerns the choice for a cross-sectional comparison of one moment in time versus a cross-time analysis. Most quantitative-statistical research is cross sectional by nature, even when researchers present data from different moments in time. For instance, Castles (2000) analyzed data about public policy functions from 1960, 1974, and the early 1990s, claiming to illustrate change over time. However, his data represent nothing more and nothing less than three cross-sectional slices of three different moments in time. Hence, his analysis is still static and cannot capture the dynamics of social change over time. True cross-time analysis of a quantitative-statistical bend requires concepts, and thus data, that "travel" over time. This has proven to be extremely difficult. Just consider the fact that politicians as we define them nowadays, namely as elected representatives of the people, simply did not exist before the late eighteenth and early nineteenth centuries. Indeed, a distinction between politicians and career

civil servants did not exist until that time. Consequently, most quantitative cross-time research is limited to the nineteenth and twentieth centuries, as is evidenced, for instance, by the annual publication of the *Yearbook of European Administrative History* (published between 1989–2008). Qualitative (or configurational) research is not limited to the recent past.

Frendreis (1983, pp. 258–259) also discussed the challenges of quantitative research mentioned above, but specifically notes that it is a challenge not to violate the assumption of independence of events (Galton's problem). This problem has to do with the possibilities of generalizing research findings. In nineteenth-century social science research the search for universal laws dominated. The major challenge in establishing universality is to prove that the phenomenon under investigation in two or more cases developed *independently* from one another. This not only means that the development in one case must not have influenced a comparable development in another case, but also that the developments in both cases do not have a common root. This challenge is known as the *Problem of Galton,* named after the nineteenth-century British statistician Francis Galton (and cousin of Charles Darwin) (Gnarl, 1970, p. 975; Scheuch, 1990, p. 28; Sztompka, 1990, p. 53). To date, there is possibly one development that could be considered as originating in different parts of the world (though at different times) and emerging independently, namely the pristine states in Egypt, Mesopotamia, India, China, Meso-America, and the Andes.

Moreover there is the problem of variables validity and reliability over time and across cases. Providing support to the validity of variables becomes a problem when they are measured by various tools and methods, at different times and settings. The desire of researchers to compare is frequently contaminated by the sampling of too remote variables that do not always represent the studied phenomena and/or do not measure it in the most sensitive way. Finally, the cross-sectional orientation of many comparative studies is rooted in the difficulty of collecting evidence on the same phenomena/variable from various angles and sources. This involves the problem of common-source and common-method bias that is so crucial in quality social sciences of modern times.

In the social sciences researchers have dropped the wish to identify universal laws (grand theory), and so the structural-functionalist approach lost ground considerably. They certainly have been trying to develop middle-range theory, which is the reason why so many comparative (American) studies employ a quantitative-statistical approach in order to find correlations that hint at causal probabilities. The historical-diffusions approach gains momentum, though, and is based on the idea that developments in one case

may well have influenced or were influenced by developments elsewhere. In this respect it is no surprise that the study of administrative history is on the rise (Raadschelders, 1998).

Research Technical Problems

In comparison to the problems discussed earlier in this appendix, research technical issues may appear trivial in the sense that they do not concern problems of a cognitive nature. They are, however, of great importance to the success or failure of any comparative inquiry. Research technical problems involve data, time, and places.

The (in)availability of data can make or break a research project. In the social sciences data are often used that have been collected by others. Problems with that were discussed above. It may be necessary that the available data for the various cases are recalculated (which is only possible when one is familiar with the collection rationale), resulting in a more reliable and valid comparison.

A researcher who is not satisfied with the available data in secondary sources may decide to collect data from primary sources such as archival records or interviews. This, however, is very time consuming. Time is sometimes neglected as a factor in comparative analysis. The researcher may be forced to rely upon data collected earlier by others, since the available resources may not allow for data collection. In the case of cross-national research this is certainly a major problem. Therefore comparative research is often conducted by a group of scholars (a) from one country each investigating one case according to a protocol, or (b) from several countries each investigating his/her own case/country, also according to a protocol.

The advantage of the first type (sometimes called the *safarimodel* of comparative research) is that one can be assured that all participants in the research project understand the concepts and theories used in the same manner, since they all share the same cultural background. The advantage of the second approach is that one can be sure that each participant is highly familiar with the case/country he or she is investigating for the research project. After all, an individual researcher cannot possibly claim familiarity with all relevant literature for all countries included in the research project. A good example of this is the comparative civil service systems project that was initiated in 1990 by the Departments of Public Administration at the Universities of Leiden and Rotterdam in the Netherlands and the School for Public and Environmental Affairs, Indiana

University, which resulted in seven books and several articles (for overview of this project see: Raadschelders and others, 2007, pp. 1–2; the project is briefly discussed in Heady, 2001, p. 84).

Problems of Application

So what can be done with all this comparative knowledge about governments? There are scholars who argue that globalization leads to a world where the scholarly conceptual understanding of government is converging. Indeed, contemporary challenges of government and governance are phrased in terms that are remarkably similar, whether in Australia, Brazil, Canada, India, Nigeria, Russia, or Vanuatu. Citizens, practitioners, and scholars use the same words, such as bureaucracy, decentralization, civil service, performance, corruption, and so forth, without necessarily realizing the specific meaning in their own political, social, and cultural environment. It is true that, in terms of structure, governments are quite comparable, and this is illustrated in Chapters 2 to 8. In terms of functioning they are quite different; that is, they reflect the specific historical and geographical circumstances that shaped them, as will be illustrated in Chapters 9 to 12.

If governments are more or less comparable in terms of structure and are much less comparable in terms of functioning, it follows that we cannot simply assume that a best practice in one country can be adopted somewhere else. In the 1990s one of the authors of this book addressed a group of civil servants from a newly independent state in Asia about decentralization and civil service systems. Toward the end of that presentation one of the delegation members approached asking whether the Dutch civil service act of 1929 was available in English, since their president had determined that his country needed a civil service act. Can we really transplant legislation, regulation, best practices, particular policy instruments, and so on, to another societal and political-administrative context? More than 30 years ago the organization theory scholar Howard Aldrich warned that organizational "innovations have failed when introduced into societies with non-supportive cultural and institutional traditions." (1979, p. 22) This is clearly a challenge in many of the newly independent states in Africa and Asia, struggling as they do with a heritage of colonial government while trying to develop a more indigenous system of government.

There is no doubt a globalization of structures of government and a globalization of concepts and terms used to describe governments and prescribe reforms. However, this structural convergence does not translate into functional similarity. That is, government and administration in any

country has clear local features, heavily influenced by cultural heritage. In that sense, globalization is not expected to occur. If anything, the globalization prompted by increased intertwinement of economic markets and by communication devices has resulted in increased awareness of the cultural differences. The prime example of this is the European Union, where all member states operate in a particular institutional framework but fight to keep their national identity. That national identity can be an abstraction (for instance, flag, national anthem), but certainly includes the more mundane and tangible elements of, for instance, "national" foodstuffs. While European integration includes the standardization of many products (e.g., electrical outlets), the European Commission has yet to succeed in developing standards for food and drinks such as English ale, French *brie,* German *bockwurst,* and Italian *spumante.*

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