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ORIGINAL PAPER

Do the Right Thing: The Impact of INGO Legitimacy Standards on Stakeholder Input

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Abstract International nongovernmental organizations (INGOs) are frequently criticized for failing to adequately represent or engage with grassroots stakeholders. Yet most explanations of this shortcoming have focused on factors external to the organizations, e.g., economic pressures that privilege donor interests. What has been largely lacking is an examination of the role of internal INGO characteristics. We address this by examining INGOs' legitimacy standards: how INGOs understand themselves to be doing the right thing and seek to convey that righteousness to others. Drawing on the literature from business ethics and organizational behavior, we show that organizations' self-selected standards of legitimacy are key drivers of behavior. Using an analysis of 57 American INGO websites, we identify 11 legitimacy types and examine their usage. We find that while most INGOs make a series of technical legitimacy claims that seem designed to attract donors, they simultaneously employ additional legitimacy standards that do not seem to be externally dictated. These additional standards generally prioritize adherence to a cause rather than stakeholder input. The findings suggest that challenges to INGO representivity or responsiveness result not only from external pressures, but also from INGOs' own choice of values.

Résumé Les organisations non gouvernementales (ONG) internationales sont souvent critiquées pour leur échec à représenter de manière adéquate ou à collaborer avec les milieux populaires. Cependant, la plupart des explications données à ce problème se concentrent sur des facteurs externes aux organisations, par exemple la pression économique qui privilégie les intérêts des donateurs. L'analyse du rôle que jouent les caractéristiques des ONG internationales est quant à elle inexistante. Nous corrigeons cela en examinant les standards de légitimité des ONG internationales, c'est-à-dire la manière dont ces organisations se convainquent qu'elles

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prennent les bonnes décisions et cherchent à porter cette vérité aux autres. À partir de la littérature portant sur l'éthique des affaires et le comportement organisationnel, nous montrons que les standards de légitimité choisis par les organisations sont les éléments clé qui dictent leur comportement. Grâce à une analyse de 57 sites web d'ONG internationales américaines, nous avons identifié 11 types de légitimités et examiné leur usage : nous avons découvert qu'alors que la plupart des ONG internationales exposent une série de revendications de légitimité d'ordre technique qui semblent destinées à attirer les donateurs, elles font simultanément appel à d'autres standards de légitimité qui ne semblent pas dictés de l'extérieur. Ces autres standards donnent en général plus d'importance à l'adhésion à une cause qu'à la contribution des parties prenantes. Ce constat suggère que les défis posés à la représentativité ou à la réactivité des ONG internationales résultent non seulement de pressions externes, mais aussi des choix de valeurs propres à ces organisations.

Zusammenfassung Internationale nicht-staatliche Organisationen werden häufig dafür kritisiert, dass sie die primären Stakeholder nicht angemessen repräsentieren oder nicht ausreichend auf sie eingehen. Doch konzentriert man sich in den Erklärungen für diesen Schwachpunkt meist auf außerhalb der Organisation liegende Faktoren, zum Beispiel den wirtschaftlichen Druck, aufgrund dessen Spenderinteressen bevorzugt werden. Was bislang größtenteils fehlt, ist eine Untersuchung der Rolle interner Merkmale der internationalen nicht-staatlichen Organisationen. Wir gehen auf diesen Punkt ein, indem wir die Legitimitätsstandards der Organisationen betrachten, d. h. wie die internationalen nicht-staatlichen Organisationen von sich selber glauben, dass sie richtig handeln und wie sie versuchen, diese Rechtschaffenheit anderen zu vermitteln. Beruhend auf der Literatur zur Geschäftsethik und zu organisationalen Verhaltensweisen zeigen wir, dass die von den Organisationen selbst gewählten Legitimitätsstandards wichtige Einflussfaktoren für ihr Verhalten darstellen. Anhand einer Analyse von 57 Websites amerikanischer internationaler nicht-staatlicher Organisationen identifizieren wir 11 Legitimitätstypen und untersuchen ihre Anwendung. Wir kommen zu dem Ergebnis, dass die Mehrheit der Organisationen zwar das Vorhandensein einer Reihe technischer Legitimitäten behauptet, die scheinbar zur Werbung von Spendern konzipiert sind, gleichzeitig jedoch zusätzliche Legitimitätsstandards anwendet, die nicht von externen Faktoren bestimmt zu sein scheinen. In der Regel haben diese zusätzlichen Standards die Verfolgung eines Zwecks gegenüber der Beachtung von Stakeholderinteressen Priorität. Die Ergebnisse lassen darauf schließen, dass die Schwierigkeiten im Zusammenhang mit der Repräsentativität oder Reaktionsfähigkeit der internationalen nicht-staatlichen Organisationen nicht nur auf externen Druck, sondern auch auf die eigenen Werte der Organisationen zurückzuführen sind.

Resumen Las organizaciones no gubernamentales internacionales (INGO, del inglés International nongovernnmental organizations) son criticadas con frecuencia por no lograr representar ni comprometerse de manera adecuada con las partes interesadas de base. Sin embargo, la mayoría de las explicaciones de este fallo se han centrado en factores externos a las organizaciones, por ejemplo, presiones

económicas que dan preferencia a los intereses del donante. Lo que ha estado faltando ampliamente es un examen del papel de las características internas de las INGO. Abordamos esto examinando los estándares de legitimidad de las INGO: cómo las INGO entienden por sí mismas que están haciendo lo correcto y tratan de transmitir dicha rectitud a otros. Basándonos en el material publicado sobre ética empresarial y comportamiento organizativo, mostramos que los estándares autoseleccionados de legitimidad de las organizaciones son impulsores claves del comportamiento. Utilizando un análisis de 57 páginas Web de INGO americanas, identificamos 11 tipos de legitimidad y examinamos su uso. Encontramos que mientras que las INGO realizan una serie de reivindicaciones de legitimidad técnicas que parecen diseñadas para atraer a donantes, emplean simultáneamente estándares de legitimidad adicionales que no parecen estar dictados externamente. Estos estándares adicionales dan prioridad generalmente a la adhesión a una causa en lugar de a la participación de las partes interesadas. Los hallazgos sugieren que los retos con respecto a la represen-tatividad o a la reactividad de las INGO no resultan solamente de presiones externas, sino también de la propia elección de valores de las INGO.

Keywords Nongovernmental organizations · Legitimacy · Representation · Stakeholders · Donors · Development

Introduction

Over the past fifteen years, a growing concern about international nongovernmental organizations' (INGOs) responsiveness and representivity has emerged within the literature on transnational civil society and global governance. INGOs were once regarded as likely democratizers of global governance and a grassroots counterbalance to the power of global elites (Florini and Simmons 2000; Held 1995; Lipschutz and Ron 1992; Matthews 1998; Nanz and Steffek 2004). A growing number of voices, however, have raised concerns about whether INGOs are truly accountable to most stakeholders or whether they constitute a new form of elite influence (Anderson 2000; Manji and O'Coill 2002; McKeon 2010; Murphy 2005; Nelson 1997; Wade 2009; cf. Kamat 2004; cf. Scholte 2012).

Much of the examination of this question has focused largely on factors external to the INGOs themselves. Even those authors critical of INGOs' responsiveness and representivity tend to blame the external forces. The tendency of INGOs to champion those local movements that reinforce the INGO's existing agenda is depicted as a natural response to the marketized environment in which INGOs operate (Bob 2005; Cooley and Ron 2002; Pallas 2010a). Similarly, instances in which INGOs based in the global North ignore or override the concerns of their Southern partners and reinforce the positions of Northern policymakers are depicted as a natural consequence of pre-existing imbalances in global power or the manipulation of Northern donors (Manji and O'Coill 2002; Murphy 2005; cf. Nelson 2000; cf. Scholte et al. 2009). Thus, structure is emphasized over agency.

This focus on external factors reflects what Ebrahim (2007, p. 193) describes as the "traditional" view of INGOs, in which they "are primarily seen as the passive subjects of external oversight and punishment." In addition to minimizing INGO agency, this view tends to treat INGOs as a homogenous class, overlooking data on the differences among INGOs and the ways in which internal dynamics may affect the organization's behavior and direction. In some INGOs, for instance, organizational direction may be set largely by staff members or by a board of directors. In others, grassroots members may be invited to vote annually on the organization's direction. Brown et al. (2012) identify five different INGO architecture types, and suggest that different architectures reflect and facilitate different types of accountability. Similarly, Ebrahim (2007, pp. 203–207) argues that "membership," "service," and "network" organizations are accountable to different principals and via different mechanisms. Other research makes clear that different INGOs have different practices for interacting with local stakeholders. In Greenpeace, for instance, local chapters function like franchises, wherein strategic direction comes from the international level along with the permission to use the Greenpeace name (Timmer 2005). For Friends of the Earth International, this pattern is inverted; national chapters vote annually to set the international agenda (Doherty 2006). Thus, internal factors, i.e., organizational policies or attributes, may also impact how well INGOs represent and respond to stakeholders.

This paper examines the ways in which variations among INGOs influence INGO representivity and responsiveness through an examination of INGO legitimacy standards. Drawing on the literature on organizational behavior and business ethics, we define legitimacy as the standard or standards by which an organization judges for itself and conveys to others that it is doing the 'right' thing, i.e., operating in a morally acceptable fashion. Legitimacy is often closely tied to an organization's stated mission or purpose, making it well suited for assessing the principle-driven aspects of INGOs' behavior. Because it has both internal and external dimensions, legitimacy is also useful in theorizing how an organization's internal processes or culture can interact with external pressures, such as the need for financial resources and competition for donor attention, already identified in the literature on INGO behavior.

Through an examination of the legitimacy standards used by 57 INGOs based in the United States, we identify eleven distinct legitimacy types. These fall into three general categories: democratic legitimacy, defined by representation of a stakeholder population; moral legitimacy, defined by adherence to a cause; and technical legitimacy, defined by adherence to third-party standards for efficiency, competence, or financial probity. Not all legitimacy types reflect the same value for stakeholder representation or responsiveness. Rather, even within each category they appear on a distinct spectrum, with clear variation in regards both to the number of stakeholders to whom the legitimacy types make an INGO accountable and as to whether those stakeholders include only donors or also include other persons impacted by an INGO's activities.

We find that most INGOs employ multiple measures of legitimacy. Several types of legitimacy, including adherence to legal standards, third-party auditing, and claims of expertise, are used very widely in spite of the differences among INGOs

and appear related to the external environment, suggesting that structural factors may constrain agency. Only two of the 57 INGOs examined did not use at least one of these forms of legitimacy. These externally oriented standards are some of those least likely to enhance the empowerment or representation of most INGOs' expected beneficiaries and most likely to enhance the power of donors. Their widespread use supports arguments that external pressures help make INGOs most accountable to their funding populations.

However, we also find that most INGOs use some democratic or moral legitimacy standard alongside their technical standards. In examining these, we found that only a fraction of our sample used legitimacy standards that included representation of stakeholders and that required INGOs to actively engage with stakeholders to understand their needs or desires. Even within this group, only a minority provided data indicating adherence to the standards they espoused.

The adherence of most organizations to multiple legitimacy standards suggests that these donor-focused standards exist as a complement to an organization's own internally determined standards, rather than displacing these. The impetus to act in a responsive, representative way is itself reflective of a distinct set of organizational values. Thus, shortcomings in INGO representivity and responsiveness exist not merely because external pressures have forced INGOs to prioritize donor interests, but rather also because many organizations derive their legitimacy from factors other than stakeholder input.

INGOs and Legitimacy

Although a substantial body of literature addresses the question of INGO legitimacy, the vast majority of this literature is highly normative. In general, this body of work acknowledges problems in current INGO behavior and develops new standards for judging INGO legitimacy or improving INGO behavior through the imposition of new norms or practices. Uhlin (2010), for instance, develops a metric for assessing the democratic legitimacy of transnational actors. Pallas (2010b) uses this metric to develop contextual-based standards from judging INGO behavior. Acting on implicit standards for legitimate INGO behavior, other works focus on reforming INGO conduct. Reiser and Kelly (2011, p. 1011), for example, claims that "NGOs need to be composed and governed accountably in order to legitimate their role in global governance," while Scholte (2004, pp. 231–232) writes that INGOs must develop their accountability in order to be perceived as legitimate by external authorities, such as "politicians, officials, business leaders, journalists and academics." Argandoã (2009) goes further still, supporting a system in which NGOs would create their own codes of ethics, but have these codes reviewed by a third party that would certify that their codes contain "a certain minimum of ethical content."

These works help establish the problems with INGO representation and responsiveness and establish such problems as impacting the legitimacy of INGOs. For most authors, the focus on INGO accountability reflects a belief that INGO ought to act on behalf of the constituency they claim to represent; they connect this

to the idea of democratic legitimacy (e.g., Pallas 2010b; Scholte 2004; cf. Ebrahim 2007). However, this literature focuses on improving legitimacy through developing new, externally promulgated standards for INGO behavior, without an in-depth analysis of the factors that may cause INGOs to neglect adequate stakeholder representation or responsiveness currently.

One exception is Vedder et al. (2007) who use extensive interviews to gather data on INGO legitimacy with the specific intent of addressing NGO impact on global governance and on stakeholder representation in particular. Their study goes further than previous work in seeking to theorize the varieties of legitimacy types used by INGOs, and it connects decisions made internally within the INGOs regarding what type of legitimacy to seek with those INGOs' external behavior. However, the intent of the work is still fundamentally normative. As Vedder states, the focus of their research program was to determine "under what conditions can NGOs themselves be rightfully considered legitimate?" (2007a, p. ix). Moreover, the study focuses more on clustering INGOs' descriptions of their own standards than associating those standards with observable behaviors. This leads to ambiguities in the resulting typology. For instance, the category of "popular support" includes examples of member input, yet member input is also featured under the category of "representation" (Collingwood and Logister 2007 p. 33, 43). Acting to represent stakeholders, in turn, is also referenced under "international norms," and seeking affirmation by governments appears under both "international norms" and "public recognition" (Collingwood and Logister 2007, pp. 39–41). Thus, the typology that the study uses to organize its own data does not constitute a readily applicable tool for analyzing the behavior of other INGOs.

More systematic explanations for current INGO shortcomings come from a body of literature that depicts INGOs as having business-like concerns with organizational survival or the marketing of their activities to members and donors (Bob 2005; Cooley and Ron 2002; Pallas 2010a). This literature suggests that INGOs fail to adequately represent stakeholder interests or respond to stakeholder needs because they are constrained by their need for organizational survival, especially funding. At best, this causes them to pick and choose among stakeholder needs or causes in order to find those most suitable for their organization and most interesting to their members or donors (Bob 2005; Pallas 2010a; Pallas and Urpelainen 2013). At worst, it places them in a situation in which they become beholden to powerful donors, particularly intergovernmental organizations or powerful states, and become instruments of their interests (Manji and O'Coill 2002; Murphy 2005; cf. Cooley and Ron 2002; cf. Fernando 2011; cf. Simbi and Thom 2000).

In short, the literature establishes that INGOs' legitimacy, as perceived by external audiences, is connected to their ability to represent stakeholders or respond to stakeholder needs. It also indicates that INGOs themselves make conscious decisions regarding the legitimacy standards they employ and that such standards affect their behavior. However, it offers no systematic assessment of how INGOs' legitimacy standards impact their representivity or responsiveness. As Brown et al. (2012, p. 1102) write regarding international advocacy NGOs, "the links among primary accountability, governance arrangements, and legitimacy [remain] murky or unexamined."

Defining Legitimacy

Our goal in defining legitimacy is to arrive at a definition suitable for empirical research. As such, it must be relevant to the observed behavior of INGOs. Within the political science literature, legitimacy is typically defined with reference to the consent of the governed, international recognition, or adherence to international norms. Such definitions, however, are typically applied to states. They have limited relevance to INGOs because, unlike state citizens, INGO members generally join them voluntarily and because INGOs themselves are yet to be subject to international protocols for recognition or widely accepted norms. Vedder et al. (2007) acknowledges this point, noting that for INGOs, "legitimacy is a thoroughly normative notion mostly associated with (public) justification, legality, and representation" (Vedder 2007b, p. 7). Yet legitimacy conveys more than mere obedience to external standards; Vedder notes that for INGOs legality, for instance, "is neither a necessary nor sufficient condition for legitimacy" and that "from a moral point of view, the social and regulator dimensions [of legitimacy] can be seen as subordinate to the morally normative one" (Vedder 2007b, p. 9; cf. Slim 2004). INGOs do not always function within a set of consistent legal frameworks and are, in many regards, only loosely regulated. Moreover, in appealing to multiple constituencies, including grassroots members, government officials, and other stakeholders impacted by their actions, their censure from one population may be offset by approbation from another.

Because of the scarcity of data on legitimacy in the NGO literature, we turn to the literature on organizational behavior and business ethics. A number of studies have already indicated the applicability business literature to NGO behavior (Cooley and Ron 2002; Bob 2005; Sell and Prakash 2007; Werker and Ahmed 2008; cf. Meyer 1995). Bob, for instance, notes that while NGOs have missions quite distinct from business' profit-seeking, "NGOs at their root, are organizations—with all the anxieties about maintenance, survival, and growth that beset every organization" (2005, p. 14). Sell and Prakash go further. They argue that, like businesses, NGOs often provide excludable benefits to a limited group of shareholders or stakeholders (Sell and Prakash 2007, pp. 151–152). They also demonstrate that the strategies and actions of businesses and NGOs may be very similar when conducting advocacy (Sell and Prakash 2007, p. 168). We recognize that INGOs' charitable intentions distinguish them from for-profit businesses in significant ways and that they offer a distinct value proposition to their employees, who may forego some financial benefit in order to pursue personal moral objectives. Nonetheless this body of research suggests that the processes by which each type of organization determines their organizational behavior while in pursuit of their respective objectives are comparable.

The business literature addresses legitimacy much more explicitly as a driver of organizational behavior. It also manifests a more uniform understanding of legitimacy, relying heavily on the work of Mark Suchman (1995) (Baur and Palazzo 2011; Baur and Schmitz 2012; Crespy and Miller 2011; Joutsenvitra 2011; Sonpar et al. 2010; Valentina and Tashman 2012). Suchman (1995, p. 578) defines legitimacy as, "a generalized perception or assumption that the actions of an entity

are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions." However, it is not established by appeals to arbitrary standards so much as it is via appeals to observers' internal moral sense; Suchman (1995, p. 574) states that "legitimacy is a perception or assumption in that it represents a reaction of observers to the organization as they see it; thus, legitimacy is possessed objectively, yet created subjectively." Significantly, organizations can appeal to multiple standards of legitimacy.

This is congruent with the work of Collingwood and Logister (2007), who suggest that INGOs and the individuals who direct them are guided by some sort of internal moral compass. They observe that INGO staff asked about legitimacy standards are able to define and conceptualize legitimacy and connect it to their organizations' activities. They also note that the participants in their study identified different and sometimes conflicting standards of legitimacy, again suggesting a multiplicity of standards.

Combining Suchman's work with the findings of Collingwood and Logister, we might best understand legitimacy not as the conformance to norms per se, but rather as *conformance to a set of standards or beliefs for the purpose of appearing right.* It is not the conformance itself that defines legitimacy, nor the norms, laws, or standards to which one might conform, but rather the appearance of rightness that results. This appearance may be geared toward public consumption, but it may also affect how one appears to one's self. To put it in colloquial terms, for INGOs, legitimacy is about both the ability to look others in the eye and to look at oneself in the mirror.

In short, for INGOs, legitimacy is about more than adherence to local standards. Rather, it refers to adherence to a set of guiding norms for the benefit of internal and external audiences. All components are highly contextual, depending on the personal beliefs of the staff working for an INGO or the audience to which they intend to appeal. It is also possible for INGOs to embrace multiple standards including, conceivably, different standards for internal and external audiences.

Methodology

In order to understand the impact legitimacy standard selection has on INGO responsiveness and representation, we need to determine what legitimacy standards are available to INGOs, how those standards relate to representation and responsiveness, and which standards are used by different INGOs.

Starting with 6313[1] NGOs listed on CharityNavigator.org, we selected a list of 995 NGOs with an international focus. Charity Navigator is itself a nonprofit organisation which categorizes and collects data on legally registered nonprofit organizations[2] within the United States. While its listing of NGOs is not comprehensive, it is focused on NGOs that have been in existence for at least 7 years and it prioritizes NGOs for inclusion on the basis of organization size and

[1] As of spring 2013. Currently Charity Navigator evaluates closer to 7000 NGOs.

[2] All organizations in the database are 501(c)3 organizations. See note '3,' below.

the percentage of revenues coming from private donors.[3] Thus using its listing focused our sample on the more enduring and influential core of the nonprofit sector. The 995 INGOs were identified by Charity Navigator as 'international' using a combination of factors, including each organization's self-description as provided in its tax filings; an examination of the organization's actual activities; and consideration of the organization's financial information.[4]

Of the 995 international NGOs, we generated a random sample of 60 organizations. This sample size was selected to facilitate intensive content analysis of the organizations' websites as a pilot examination of whether the links between legitimacy and other aspects of organizational behavior were discernable using publicly available web site data.

Within the sample, 57 of the 60 INGOs had a functioning website. Each website was subjected to content analysis to determine the scope of the INGO's work and to identify and categorize the INGO's legitimacy claims. Coders used a standardized questionnaire tool and code book to identify evidence for organizations' legitimacy claims. Revisions to the codebook, which allowed for inductive identification of new legitimacy types, were made whenever coders identified legitimacy claims not captured by existing codes. In identifying legitimacy claims, researchers considered the whole of the organization's website and assessed how publicly information was presented by recording the number of clicks necessary to reach a given datum from the home page. Claims were coded based on the language which INGOs used to justify their operations; specific examples are given in the results section, below. In addition, coders sought to identify efforts by each INGO to demonstrate that it was meeting the legitimacy standard or standards it had chosen by providing evidence of its claims.[5] To ensure inter-coder reliability, each INGO website was coded independently by two different researchers (out of a total team of three coders), and the results were then reconciled.

The resulting website data were then analyzed through descriptive statistics and logistic regression models to identify links between legitimacy types and organizations' other attributes, including the organization's general focus, such as advocacy or service delivery work; the specific issue areas, such as human rights or education, with which the organization engaged; regions in which the organization operated; funding levels; program expenses; and assets. Additional details of the analysis are provided in the descriptions of Tables 3 and 5.

[3] "What Kind of Charities Do We Evaluate?" www.charitynavigator.org/index.cfm?bay=content.view&cpid=32 (Accessed 28 Oct 2013). Also lead author's correspondence with the organization, 29 October 2013.

[4] "How Do We Classify Charities?" http://www.charitynavigator.org/index.cfm?bay=content.view&cpid=34 (Accessed 28 Oct 2013)

[5] For instance, an NGO claiming to be 'speaking on behalf of the farmers of the West African Sahel' would be coded as Representative. Reports that the organization had consulted with villagers in the Sahel or conducted surveys of the farmers would then be considered evidence of having met the legitimacy standard.

Results

We focus in this article primarily on the results linking legitimacy type with activity type and the provision of evidence for legitimacy claims. Our analysis of INGO websites identified 11 different legitimacy standards. Some of these standards were suggested in the aforementioned normative literature and verified in our data. Others were derived inductively. We group these standards into three general categories: democratic legitimacy, moral legitimacy, and technical legitimacy.[6]

Democratic Legitimacy

Democratic standards were defined by an appeal to democratic norms of representation or majority rule. Three distinct standards were identified:

- *Majoritarian* INGOs appealing to this standard claim that they have ascertained the will of the majority of all stakeholders in their work and are carrying out the will of the majority. Like the Occupy Wall Street movement with its cry of 'We are the 99 %,' these organizations claim to speak for an entire class of actors, well beyond their membership, and derive legitimacy from speaking on behalf of this group. While we theorized this standard in advance of our research, drawing in part on normative writings like Pallas (2010b), we found it to be vanishingly rare in practice, perhaps because such claims are exceedingly difficult to make credibly. The only INGO in our sample to make majoritarian claims had no human stakeholders at all, but claimed to speak on behalf of the flora and fauna of the world.
- *Procedural* This standard emphasizes mechanisms for ensuring representative governance. Legitimacy in this case is not derived from (claims of) a representative outcome, but rather from the existence of a democratic process. Organizations appealing to this standard typically publicize by laws or other procedures specifying how members or constituents can vote in organizational decision-making. The International Institute for Rural Reconstruction, for instance, prominently posts its governance documents, including the procedures by which members elect the organization's trustees, in the 'About Us' section of the organization's website.[7]
- *Representative* INGOs using this standard claim to be doing the will of some selected stakeholders, choosing to act on their behalf because they need or want representation. Legitimacy is derived from the act of carrying out their will. In our research, these were often membership organizations that derived legitimacy from speaking on behalf of their members. A typical example is the International

[6] We are mindful of the fact that the variation in the length of the descriptions of standards may give the impression that some standards were more complex to qualify for than others. However, the length of the definitions is determined by the degree to which we judged that they would or would not be intuitive to our audience. Less intuitive definitions required lengthier explanations. In our coding, each definition had only a single qualifier – i.e. a discrete action or statement. Complex definitions did not have complex qualifiers.

[7] http://www.iirr.org/index.php/aboutus/ (Accessed 5 Nov 2013).

Mountain Biking Association, which advocates on behalf of its 35,000 members.[8]

Moral Legitimacy

Legitimacy standards in this category emphasize adherence to a particular cause or moral standard. In this regard, these standards are united by an emphasis more on what the INGO is doing than who it is serving or whether their will is ascertained. Three standards were identified in this group.

- *Champions* INGOs using this standard claim not to just to act on behalf of a certain set of stakeholders, but rather to act on behalf of the 'right' stakeholders, i.e., some population whose needs merit special consideration. For example, Friends of Yemin Orde, a village for abused or abandoned children, justifies it work on the basis that "Yemin Orde is a special place, led by special people, developing very special children, who give us all hope for the future."[9] The standard retains some democratic elements insofar as its claims to act on behalf of a population are generally buttressed by claims to solicit that population's input. However, unlike organizations using a democratic standard, the INGO is not subject to the population or chosen by the population; rather the INGO chooses the population based on some moral standard or mission determined by the INGO. In our research, we typically found this standard to be used by organizations engaging with populations they perceived to be vulnerable or disadvantaged, such as children or the physically ill.
- *Guardian Angels* Legitimacy here derives from fulfilling the needs of a particular group of stakeholders. Unlike the Champion standard, legitimacy does not require claims of representation nor even active dialog with the stakeholders impacted by an INGO's work. The needs the INGO fulfills are determined by the INGO itself. We found this standard to be the most common among aid INGOs such as Books for Africa, which states that it "strives to help create a culture of literacy and provide the tools of empowerment to the next generation of parents, teachers, and leaders in Africa."[10]
- *Crusaders* Crusaders claim legitimacy purely for doing the right thing. Legitimacy comes from pursuing the action or mission itself. It is a pure moral standard, one that perceives legitimacy as coming from some objective measure, unaffected by stakeholder input or interests. Although the mission or activity may have benefits to certain people, these benefits only underscore the rightness of the mission. A typical example comes from Physicians for Human Rights, which traces its mission to stop "mass atrocities and severe human rights violations" in part to the realization of one of its founders that physicians have a

[8] http://www.imba.com/about (Accessed 5 Nov 2013). To be clear, the IMBA is representative because its claims of representation extend only to its 35,000 members. Were it to claim to speak on behalf of all mountain bikers everywhere, it would be coded as majoritarian.

[9] https://yeminorde.org/index.php/2012-01-28-09-14-11/yemin-orde-youth-village (Accessed 5 Nov 2013).

[10] https://www.booksforafrica.org/why-books.html (Accessed 5 Nov 2013).

"special responsibility to prevent the horror of torture and the degradation of our skills in the aid of the torturer."[11]

Technical Legitimacy

Legitimacy standards in this category are defined by appeals to external measures or metrics. They are defined by neither a connection to a population nor to a cause, but rather to universalized standards of operation. We identified five distinct standards in this category.

- *Effectiveness* Legitimacy here derives from having achieved a stated goal. The INGO has accomplished a mission, but unlike the Crusader standard, wherein undertaking a certain mission gives legitimacy, here completion impacts legitimacy. Typically, this standard is reflected in presentations of quantifiable outputs, as with one environmental organization that, in the very first paragraph of its self-description, notes: "we've secured protection agreements for 65 million acres of forests and helped move billions of dollars of corporate buying towards environmentally responsible market solutions."[12]
- *Expertise* Organizations using this standard claim legitimacy on the basis of having expertise or of implementing their work in an expert fashion, adhering to recognized best practice. A typical statement comes from Gleaning for the World: "GFTW employs its experience and expertise to provide expedited distribution channels, logistical support and reliable and timely communication with both our corporate and individual donors."[13] Such claims are also used by advocacy NGOs, often in connection to implicit or explicit criticism of the expertise of the actors (e.g., governments or international organizations) responsible for current policies. Advocates for Youth, for instance, makes the claim that it "believes it can best serve the field by boldly advocating for a more positive and realistic approach to adolescent sexual health"[14] Claims of expertise are often combined with appeals to effectiveness.
- *Efficiency* Efficiency is defined by making the best use of available resources. It can also be described as getting the best results for the time or money invested by donors. As one organization notes, "We frequently collaborate on projects and aid shipments in order to save on costs. This lowers overhead and therefore provides greater leverage for your donation dollar."[15]
- *Audited* Legitimacy comes from adhering to established standards for financial probity. Typical efforts to appeal to this standard include publicizing organizational certifications from charity watchdog organizations or posting copies of audited financial statements.

[11] http://physiciansforhumanrights.org/issues/ and http://physiciansforhumanrights.org/about/history.html (Accessed 5 Nov 2013).

[12] http://forestethics.org/about-us (Accessed 5 Nov 2013).

[13] http://gftw.org/who-we-are/mission/ (Accessed 5 Nov 2013).

[14] http://www.advocatesforyouth.org/about-us (Accessed 12 Feb 2014).

[15] http://www.aidforstarvingchildren.org/who_we_are (Accessed 15 Oct 2013).

- *Legal* Legitimacy is derived from adhering to legal standards for INGOs, usually set by government of the country in which an INGO is headquartered. We recorded organizations as using this standard if they publicly declared their 501c3 status.

Use of Standards

Analysis of INGO use of these standards reveals several interesting points. First, 98 percent of INGOs use two or more types of legitimacy, with only a single INGO in our sample using only one. On average, INGOs used three to four standards. Among the standards used, technical standards were the most common. As Table 2 shows, over 70 percent of INGOs in the sample used Effectiveness or Legal[16] recognition as sources of legitimacy, and over 60 percent referenced an external audit or organizational expertise.

While most (86 %) of INGOs appealed to multiple technical legitimacy standards, they tended to use only one or two moral or democratic standards (Table 1). This pattern is magnified when one divides INGOs by primary activity type. We divided INGOs into three categories, Advocacy, Service delivery, and Spiritual Support, based on their primary activities. Advocacy INGOs were defined as organizations seeking to change policy or public opinion. Service delivery INGOs provided a tangible good or service. Spiritual support INGOs primarily sought to provide encouragement to a particular faith group or conduct evangelism, making them quite distinct from the other INGO types. As Table 2 shows, technical legitimacy standards were less used among faith groups, although still very common. In terms of their core non-technical standards, these groups were split between the people-centered Guardian Angels category and the cause-centered Crusaders one. Service delivery INGOs, as might be expected, also tended to use the Guardian Angels standard, although a smaller percent (46 %) used standards that required stakeholder input. Somewhat surprisingly, only 33 percent of advocacy INGOs made use of standards requiring stakeholder input. The most common legitimacy standard among such actors was Crusaders (38 percent), reflecting a strong prioritization of cause. Interestingly, advocacy INGOs also had the highest adherence to Legal and Effectiveness standards. Table 3 further highlights these distinctions, and shows how many occurred at statistically significant levels even within our pilot sample.

We also examined whether or not an INGO offered evidence to support its claims to any given legitimacy type (Table 4). The requirements for providing evidence were deliberately low, in recognition that organizations might find it difficult to demonstrate adherence to some standards. Any externally verifiable data, ranging from an audit report to case studies of people helped, were counted as evidence. Significantly, in the two input-dependent categories used most often, Representative

[16] All NGOs in the sample were registered charities (501c3 organizations), as per the criteria for inclusion in the Charity Navigator database. However, not all NGOs listed their legal standing on their websites, suggesting that not all employed their legal standing as a source of legitimacy, at least in the public sphere.

Table 1 INGO legitimacy standard usage

Legitimacy type	Majoritarian	Procedural	Representative	Champions	Guardian angels	Crusaders	Efficiency	Effectiveness	Expertise	Audited	Legal
% of total	1.75 %	3.51 %	19.30 %	19.30 %	52.63 %	21.05 %	35.09 %	71.93 %	61.40 %	68.42 %	80.70 %

Percentages are of the total sample of 57 INGOs

Table 2 Legitimacy standard by activity type

	Majoritarian	Procedural	Representative	Champions	Guardian angels	Crusaders	Efficiency	Effectiveness	Expertise	Audited	Legal
Advocacy ($n = 13$)	0 %	0 %	30.8 %	7.7 %	23.1 %	38.5 %	7.7 %	92.3 %	76.9 %	69.2 %	76.9 %
Service ($n = 36$)	2.8 %	5.6 %	16.7 %	27.8 %	63.9 %	8.3 %	52.8 %	69.4 %	61.1 %	72.2 %	83.3 %
Spiritual ($n = 8$)	0 %	0 %	12.5 %	0 %	50 %	50 %	0 %	50 %	37.5 %	50 %	75 %

Table 3 Relative probability of standard use by INGO type

	Representative	Champions	Guardian angels	Crusaders	Efficiency	Effectiveness	Expertise	Audited	Legal
Advocacy type INGO	2.349	0.283	0.189**	3.304*	0.110**	6.207*	2.533	1.050	0.741
Service delivery type INGO	0.640	7.692*	3.538**	0.121***	22.353***	0.710	0.967	1.600	1.562
Spiritual type INGO	0.557	N/A	0.885	5.125**	N/A	0.324	0.319	0.400	0.675
N	11	11	30	12	20	41	35	39	46

Each cell in the table reports the exponentiated coefficient from a logistic regression of the Legitimacy Standard Type on each Primary

INGO Type separately. The exponentiated coefficient gives the odds of an INGO of that type using the legitimacy standard compared to INGOs not of that type (e.g., the odds of an Advocacy Type INGO using the legitimacy standard compared to non-Advocacy Type INGOs). Odds ratios less than 1 indicate that INGOs of that type are less likely to use the legitimacy standard than INGOs not of that type, whereas odds ratios greater than 1 indicate that INGOs of that type are more likely to use the legitimacy standard than INGOs not of that type. Majoritarian and Procedural standards are excluded because only INGOs of a single type used these standards. Statistical significance was assessed based on a Wald Test with 1 degree of freedom

* p value <0.10; ** p value <0.05; *** p value <0.01

and Champion, evidence was provided in less than half the instances of their use. Conversely, the legitimacy types Guardian Angels, Efficiency, Effectiveness, Expertise, and Audited were all supported by evidence at least 80 % of the time. Surprisingly, Legal legitimacy was only backed up with evidence in 74 % of the cases even though 100 % of the INGOs assessed were registered charities. INGOs were much more likely to provide evidence of having fulfilled claims to legitimacy based on Guardian Angels, Efficiency, Effectiveness, Expertise, and Audited than on any other standard (Table 5).

Discussion

These results have relevance for our understanding of INGO accountability and of our understanding of the impacts of donor pressure on INGO behavior. In particular, they indicate that INGOs have strong accountability, but mostly to donor populations. INGOs also use legitimacy standards that seem autonomously chosen but, in many cases, do little to connect INGOs to most stakeholders. As a result of both these factors, improving INGO representivity and responsiveness may require not just introducing new standards, but displacing existing ones.

INGOs have not Eschewed Accountability

As noted earlier, much of the literature on INGO legitimacy and behavior culminates in generating new accountability standards for INGOs. Yet it is important to recognize that INGOs already demonstrate significant accountability. The vast majority of INGOs in our sample, regardless of organization type, employed technical legitimacy standards, making claims of efficiency, effectiveness, expertise, legality, or financial probity. These legitimacy standards generate accountability in significant ways. First, some standards require fulfillment of an objective set of criteria: legality requires satisfying government requirements for registration; auditing requires third-party scrutiny of an organization's finances. Thus, accountability to specific (albeit narrow) external audiences is embedded in such claims.

Second, INGOs provide much more evidence for their claims of technical legitimacy than most of their other claims, suggesting that INGOs think that audiences will seek to verify INGO claims with regards to these standards or will privilege INGOs of verified technical quality. Thus, INGO behavior itself suggests accountability to external audiences with regards to technical legitimacy claims.

Third, providing information itself creates accountability, perhaps even beyond the ways the INGO intends. Insofar as accountability can be defined as the ability to impose consequences for actions (particularly adverse ones), providing concrete information on an organization's activities goes a long way toward establishing accountability, because it creates awareness of the actions (cf. Scholte 2011).

Table 4 Providing evidence of legitimacy

Legitimacy type	Majoritarian	Procedural	Representative	Champions	Guardian angels	Crusaders	Efficiency	Effectiveness	Expertise	Audited	Legal
N	1	2	11	11	30	12	20	41	35	39	46
% Evidence	NA	100	45.45	45.45	80	58.33	85	82.93	88.57	84.62	73.91

Table 5 Probability of evidence provision

	Evidence provided for legitimacy standard used
Majoritarian	N/A
Procedural	N/A
Representative	0.833
Champions	0.833
Guardian angels	4.000***
Crusaders	1.400
Efficiency	5.667***
Effectiveness	4.857***
Expertise	7.750***
Audited	5.500***
Legal	2.833***

Each cell in the table reports the exponentiated coefficient from a logistic regression of whether evidence for the legitimacy standard was presented on each Legitimacy Standard Type. A separate legitimacy model was constructed for each standard with an indicator variable for the standard regressed on an indicator variable for whether evidence was presented. The exponentiated coefficient gives the odds of an INGO using that legitimacy standard presenting evidence compared to INGOs that do not use that legitimacy standard (e.g., the odds of an INGO using the Efficiency legitimacy standard presenting evidence for that standard compared to INGOs using other legitimacy types presenting evidence for those standards). Odds ratios less than 1 indicate that INGOs using the legitimacy standard are less likely to present evidence than INGOs not using that standard, whereas odds ratios greater than 1 indicate that INGOs using the legitimacy standard are more likely to present evidence than INGOs not using that standard. Statistical significance was assessed based on a Wald Test with 1 degree of freedom

* p value <0.10; ** p value <0.05; *** p value <0.01

The Market May Drive Accountability Standards

The data also indicate that INGOs are more accountable to some audiences than others. The advocacy, service delivery, and spiritual categories in our sample reflected quite distinct activity types and the data showed variation in the mix of legitimacy types preferred by the organizations of each category. Yet in spite of their differences, organizations of all categories converged around certain technical standards: effectiveness, expertise, auditing, and legality. Efficiency was also a major claim for service delivery INGOs. These standards either deal directly with financing and expenses, or provide the sort of proxy indicator—government or expert evaluation—useful to external investors with limited expertise of their own. None of the most commonly used standards requires INGOs to solicit or respond to input from the people they claim to represent or who are impacted by their work. Indeed, only one—effectiveness—actually deals with the impacts of an organization's work, and it does so via standards the organization sets, not the stakeholders impacted by its actions. In short, organizational accountability seems to be the greatest toward donors, including members and funding institutions, and, to a lesser extent, the headquarters country government. This conforms with the observation of Ebrahim (2007) who suggests that NGOs are most accountable to those constituencies who have the flexibility to withdraw support from one NGO and

reallocate it to another, a phenomenon that generally privileges donors over aid recipients or most other INGO-affected populations.

INGOs operate under resource constraints (Cooley and Ron 2002; Pallas 2010a). Fulfilling these legitimacy standards imposes a cost on the organization (potentially a significant one in some cases, such as when hiring outside auditors), that must be offset by some sort of benefit. Yet all of these standards are undertaken voluntarily or, in the case of legality, publicized voluntarily.[17] (As noted in the Methodology, all organizations examined were legally registered 501(c)3 organizations based in the US, yet not all organizations chose to employ legality as a legitimacy standard.) External auditing is not required to obtain or retain 501(c)3 status.[18]

Building off Ebrahim's observation, we suggest that the convergence of INGOs on certain legitimacy claims reflects a type of market pressure. The standards which were most commonly used among INGOs within a given type were also, in most cases, the standards for which they were most likely to provide evidence. As noted above, this suggests a concern with external scrutiny. It also suggests that external pressures may be able to overcome organizational distinctions, producing certain similarities in behavior. Taken together with the donor-friendly nature of many of the legitimacy types on which INGOs converge, the most likely explanation of convergence is that a combination of donor pressure and competition among INGOs for donor support drives INGOs to adopt certain standards of legitimacy and holds INGOs accountable for fulfilling them.

Not All INGOs are Interested in Representation or Responsiveness

The contrast between accountability toward donors versus impacted populations is especially striking in the case of advocacy organizations. Arguments for the capacity of INGOs to democratize global governance are predicated on the assumption that most INGOs act to represent specific groups of people, communicating the interests of those stakeholders to policymakers and other elites. Indeed, one argument advanced in response to complaints about global civil society being dominated by INGOs that act on behalf of Northern stakeholders is that it is simply immature. Current INGOs may not act in response to the majority of potential stakeholders, the argument suggests, but each INGO acts to represent some stakeholders (Clark, 2008). As INGOs proliferate, all stakeholders will find or create their own proxies, resulting in a mechanism for global democracy (cf. Held 2006). Our standards for democratic legitimacy accommodate this claim. They do not specify that INGOs must represent persons from developing countries or other marginalized populations; any INGO claiming to represent any population qualified for one of the democratic legitimacy types. Surprisingly, we find that a significant portion of INGOs engaged in advocacy seem to have no democratic or representative interests at all. They derive legitimacy from allegiance to a cause,

[17] To be clear, legal registration as a 501(c)3, is not a federal requirement for forming an NGO-type organization in the US. However, it is required in order for the organization and its donors to receive certain tax benefits. Also, as noted under Methodology, it was required for inclusion in our sample.

[18] See http://www.irs.gov/Charities-%26-Non-Profits/Charitable-Organizations/Exemption-Requirements-Section-501%28c%29%283%29-Organizations for additional details.

rather than any type of human input. Even those that do involve some measure of representation gravitate toward the Champions category, in which stakeholders are chosen in part because the INGOs' existing standards identify them as important or worthy. These things suggest that many of those INGOs which are theorized to be the basis of democratic global governance have either no real interest in representation or may use stakeholder input in an instrumental fashion, to support a pre-existing cause.

Improving Responsiveness and Representation

Taken together, our findings suggest that problems in representivity and responsiveness do not result only from external pressures. As noted, the proliferation of certain legitimacy standards across all categories of INGOs suggests that these standards may result from a common operating environment. If this is true, then certainly external pressures can and do change INGO behavior. Insofar as these technical standards enhance INGO accountability to donors, then their proliferation may be seen as evidence of the claim that external pressures, such as a marketized environment, decrease INGO accountability toward nondonor populations.

However, the fact that most INGOs hold moral or democratic standards alongside technical standards suggests that external pressures expand INGOs' legitimacy strategies without effacing pre-existing legitimacy concerns. The variety of these moral and democratic legitimacy standards, contrasted with the much more widespread and consistent uptake of technical legitimacy standards, suggests that moral and democratic standards are either chosen independently by each INGO based solely on internal considerations or are part of a strategic effort to differentiate the INGO from potential competitors and to appeal to specific groups of donors. In either case, the absence of representivity and responsiveness results not only from external pressures, but also from the internal decision-making of INGOs.

If this is true, then making INGOs more accountable to stakeholder populations, especially the marginalized populations most affected by aid and advocacy, is not simply a matter of introducing new standards or mechanisms of accountability. Rather, it may require displacing existing standards or diminishing the power of existing accountability mechanisms. In a real sense, INGO accountability toward the populations affected by their work may have to be traded off against accountability to the populations that fund that work or the autonomy of the INGOs conducting it.

Limitations

There are two key limitations to the study. First, we assume that public claims of legitimacy genuinely guide organizations' behavior. Insofar as many organizations provide evidence for fulfilling the claims that they make, we feel that this is a reasonable assumption. Moreover, we have analyzed and distinguished between the claims for which evidence is provided and those for which it is not. Nonetheless, by using website data, we run the risk of mistaking marketing-oriented

communications for genuine disclosures of decision-making. While the data gathered from the websites are highly suggestive, additional information on INGOs' internal decision-making processes would further illuminate their behavior. We discuss how this limitation can be addressed under Further Research, below.

Second, our sample is limited in a number of dimensions. Its small size makes some of our findings more suggestive than conclusive. Our use of Charity Navigator's list as a sampling frame leads us to focus on larger NGOs with more private funding, rather than on the whole INGO sector. We have also focused exclusively on US-based INGOs. While a large number of prominent INGOs are based in the US, US-based INGOs are by no means the only constituents of the INGO field. Steps in expanding the sample size are also discussed under Further Research.

Conclusions

In spite of these limitations, this paper makes a number of important contributions. First, the paper confirms claims in the literature that market forces drive INGO behavior and limit representivity or responsiveness to marginalized stakeholders while favoring the interests of donor populations. Our findings go beyond the case studies-based approach used in much of the previous research to suggest that this is a generalizable trend.

At the same time, our work identifies an important limitation of the market-focused approach to explaining INGO behavior. By demonstrating that donor-pleasing legitimacy claims may exist alongside other legitimacy standards, our findings suggest that problems with INGO representation and responsiveness result not only from external pressure but also from organizations' own internal decision-making processes. This finding is further magnified by the observation that while most INGOs embrace some nontechnical standards of legitimacy, very few use standards focused on cultivating or responding to input from the populations most impacted by their work.

In addition to contributing to our general understanding of INGO behavior, these dynamics potentially have important implications for development. While the problem of Southern civil society organizations' loss of local connection when working with Northern donors is well documented, most research has been ad hoc or has focused narrowly on the contract conditions embedded in foreign aid. The existence of common legitimacy standards among American INGOs suggests that the underlying loss of local connection may also be caused by a shift in legitimacy standards. As local CSOs in the global South interact with foreign supporters from the global North, whether donors or INGO partners, they may begin to absorb new standards for evaluating their own operations and performance, i.e., for determining whether what they are doing is 'right.' These standards, which derive from practices in the global North, may prioritize conformance to technical standards or adherence to cause over grassroots connections.

Further Research

The findings demonstrate the potential of the research template developed, particularly the possibility of identifying legitimacy claims via website content analysis and of aggregating such data to make observations regarding a larger population of INGOs. However, as noted earlier, the current study faces limitations in its approach and sample. Two avenues of investigation could help advance the research presented here.

First, intensive interviewing, observation, or other engagement with INGOs should be used to compare public legitimacy claims with internal processes. While we have argued that public and internal processes are generally aligned, we recognize that important exceptions to this trend may exist and should be identified. Such research would also help explicate how INGOs themselves conceive of legitimacy and use it in their decision-making.

Second, larger N analysis of website data can be used to expand the findings made in this study and perhaps identify additional dynamics not detectable at significant levels due to the small size of this pilot phase. Incorporating domestic NGOs and INGOs from other donor states may yield additional findings. Ultimately, comparing such analyses with an examination of INGOs in the developing world (which would require data collection techniques beyond website analysis) may contribute to identifying North–South divides and determining whether Northern aid has led to a wide-spread diffusion of Northern legitimacy standards.

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Appendix

See Table 6.

Table 6 List of INGOs included in the study, and the location of their headquarters

Accordia Global Health Foundation - DC
Advocates for Youth - DC
AFS-USA - NY
Aid for Starving Children - CA
Alternative Gifts International - KS
American Friends of Neveh Zion - NY[a]
Books For Africa - MN
Child Foundation - OR
ChildFund International - VA
Children of The Americas - CA
Children's Hunger Fund - CA
Common Hope - MN

Table 6 continued

Conference of Presidents of Major American Jewish Organizations Fund - NY
Dian Fossey Gorilla Fund International - GA
Diskin Orphan Home of Israel - NY[a]
EarthRights International - DC
Faith In Practice - TX
Fauna & Flora International - DC
FIRST - NH
Foreign Policy Research Institute - PA
ForestEthics - CA
Free the Slaves - DC
Friends of Yemin Orde - MD
Gleaning for the World - VA
Global Links - PA
God's Littlest Angels - CO
Half the Sky Foundation - CA
Harrison International - OK
Hesperian Health Guides - CA
Hope Unlimited for Children - CA
Hopegivers International - GA
Indian Muslim Relief and Charities - CA
INMED Partnerships for Children - VA
International Crane Foundation - WI
International Institute of Rural Reconstruction (IIRR) - NY
International Mountain Bicycling Association - CO
Island Press - DC
Jerusalem Fellowships - NY
Jewish Women International - DC
Keep a Child Alive - NY
Leadership Resources International - IL
Love146 - CT
Mission to Unreached Peoples - TX
National Down Syndrome Society - NY
Partners In Health - MA
Physicians for Human Rights - MA
Point of View Ministries - TX
Public Radio International - MN
Quebec-Labrador Foundation - MA
Radio Visión Cristiana - NJ
Ravi Zacharias International Ministries - GA
ReSurge International - CA
Sea Turtle Conservancy - FL
Strategies for the Global Environment - VA
The Carter Center - GA

Table 6 continued

The Interfaith Alliance Foundation - DC
The Jerusalem Foundation - NY
Truth for Today World Mission School - AR
United Ukrainian American Relief Committee - PA[a]
Village Enterprise Fund - CA

[a] Denotes an INGO with no functioning website at the time of the study

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