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Council for Higher Education Accreditation
Committee on Recognition
One Dupont Circle, NW, Suite 510
Washington, DC 20036

NASPAA RE-ACCREDITATION

To the Committee,

NASPAA has breached CHEA requirements by misrepresenting itself as a global organization, treating US and non-US programs differently, and neglecting academic freedom as well as human rights. NASPAA should not be re-accredited unless it:

stops representing itself as a global organization and standard-setter, or establishes a system for representation in decision-making appropriate for a global organization; and

expresses its commitment to academic freedom and human rights, and shows how it will apply these core values consistently in accreditation and other activities.

My concerns regarding NASPAA arise from its self-described role as a global enterprise. This is a role assumed by NASPAA shortly before accreditation by CHEA in 2014. At that time, NASPAA told CHEA that it intended to accredit programs globally, rather than solely in the United States, and that it had changed its name to reflect "NASPAA's transition to a global organization."¹

Over the last decade, NASPAA leaders have repeatedly identified the organization as a global enterprise. In her 2014 NASPAA presidential address, Ethel Williams described

¹ NASPAA, *Narrative Response to CHEA* (January 2014), 1.

NASPAA as "the global standard in public service organization."² In his 2015 address, president J. Edward Kellough described NASPAA as a "global organization."³ In 2016, president Michelle Piskulich described NASPAA as "a global nonprofit organization ... operating on a global scale" with a "global mission."⁴ In 2017, president Jack Meek described NASPAA as a "global institution" with "global reach."⁵ In 2019, president Robert Orr described NASPAA as a "global leader."⁶ In 2023, president Trevor Brown said: "We are a global organization."⁷ On social media, NASPAA says that it "sets the global standard in public service education."⁸ The homepage of its website states simply: "The global standard in public service education."⁹

I will show that NASPAA has fallen short of its obligations as a "global leader" in three ways. The first is by failing to ensure global participation in NASPAA governance and activities. Although NASPAA purports to set standards and speak for "a global community," it is overwhelmingly controlled by US programs. NASPAA is a US national organization misrepresenting itself as a global organization. By failing to take the steps necessary to ensure global participation in its decision-making and activities, NASPAA has breached CHEA's diversity and inclusion requirement.¹⁰ By misrepresenting itself as a global organization, NASPAA has breached CHEA's transparency requirement¹¹ and its ethical practices requirement.¹²

² Williams, Ethel. "President's Address: The ABCs of NASPAA." *Journal of Public Affairs Education*, vol. 20 no. 1 (2014), 9–14, at 9, 10, and 12.

³ Kellough, J. Edward. "NASPAA in a Time of Transition." *Journal of Public Affairs Education*, vol. 21, no. 1 (2015), 9–12, 9.

⁴ Piskulich, C. Michelle. "NASPAA's Grand Coalition: Sustainability, Values, and Reach." *Journal of Public Affairs Education*, vol. 22, no. 1 (2016), 11–16, 12.

⁵ Meek, Jack W. "Making a Difference: Good Governance in Disrupted States." *Journal of Public Affairs Education* vol. 24, no. 2 (2018), 135-151, 137 and 141.

⁶ NASPAA, "New NASPAA accreditation standards approved," October 2019.

⁷ Message from the NASPAA Executive Council President on DEIJA, March 2023.

⁸ <https://twitter.com/naspaa>. Accessed January 4, 2024.

⁹ www.naspaa.org. Accessed January 4, 2024.

¹⁰ CHEA, *Standards and Procedures for Recognition* (October 2021), Standard 3.A. CHEA also says that diversity and inclusion is "inextricably connected" to its academic quality requirement. See page 4.

¹¹ CHEA, *Standards and Procedures for Recognition*, Standard 2. On misrepresentation, see page 5.

¹² CHEA, *Standards and Procedures for Recognition*, Standard 3.B ("ethical practices in operations") and page 5 ("highest regard for integrity of practice and ethical behavior").

The second shortfall is NASPAA's refusal to explicitly recognize and promote academic freedom. By this refusal, NASPAA has breached CHEA's ethical practices requirement and its academic quality requirement.¹³ In practice, NASPAA applies a double standard on academic freedom, indirectly making it a requirement within the United States, while neglecting it elsewhere. This violates CHEA's substantial equivalence requirement.¹⁴

The third shortfall relates to the promotion of core values. In its advocacy work, NASPAA speaks in defense of democracy, civil rights, and the rule of law within the United States while saying nothing in defense of those values elsewhere. At the same time, US NASPAA schools are working outside the formal accreditation process to promote a core-values norm for US schools that is more rigorous than the norm for non-US schools that is contained in NASPAA's accreditation standards. In both respects, NASPAA has violated CHEA's substantial equivalence requirement.

In addition, NASPAA does not acknowledge human rights, the doctrine that has been the foundation for global dialogue about state responsibilities since World War II. By failing to acknowledge and promote respect for human rights, NASPAA has breached CHEA's ethical practices requirement.

NASPAA's failure to address academic freedom and human rights is particularly important because most countries with NASPAA-accredited programs are governed by authoritarian regimes in which academic freedom and human rights are seriously threatened (Table 1, next page).

I do not argue that NASPAA should refrain from accreditation of programs in such countries. Rather, NASPAA must acknowledge the challenges associated with accreditation in places where academic freedom and human rights are severely threatened. To do this, NASPAA must identify these values explicitly, and think carefully about the defense of those values when it engages in accreditation and other aspects of its work. Presently NASPAA does not do this.

¹³ On academic quality, see *Standards and Procedures for Recognition*, Standard 1. CHEA says that this includes academic freedom. See pages 8-9 of this letter.

¹⁴ CHEA, *Standards and Procedures for Recognition*, Standard 4.C: "The accrediting organization ... is required to demonstrate that it ... applies standards that are substantially comparable to U.S. institutions."

More broadly, NASPAA has failed two fundamental tests of accreditation. It has failed to demonstrate alignment between its espoused mission, governance structure, and major activities. And it has failed to produce an overall strategy that passes the test of moral integrity.

TABLE 1: COUNTRIES WITH NASPAA ACCREDITED PROGRAMS				
Country ¹⁵	Number of schools with accredited programs	Economist Democracy Index ¹⁶	V-Dem Regime Classification ¹⁷	V-Dem Academic Freedom Index ¹⁸
USA	179	Flawed democracy	Liberal democracy	Top 40-50%
China	7	Authoritarian	Closed autocracy	Bottom 10%
Brazil	1	Flawed democracy	Electoral democracy	Bottom 30-40%
Colombia	1	Flawed democracy	Electoral democracy	Bottom 40-50%
Egypt	1	Authoritarian	Electoral autocracy	Bottom 10%
Kazakhstan	1	Authoritarian	Electoral autocracy	Bottom 30-40%
Mexico	1	Hybrid regime	Electoral democracy	Bottom 40-50%
Qatar	1	Authoritarian	Closed autocracy	Bottom 10-20%
South Korea	1	Full democracy	Liberal democracy	Top 20-30%
Venezuela	1	Authoritarian	Electoral autocracy	Bottom 10-20%
Vietnam	1	Authoritarian	Closed autocracy	Bottom 20-30%

Procedural concerns

Before moving to substance, I would like to raise two procedural concerns. The first has to do with CHEA's role in certifying NASPAA as a global standard-setter. Of the twenty-nine individuals serving on CHEA's board, executive committee, and recognition committee, it appears that only one is affiliated with an institution based outside the United States. I cannot see how one US-controlled organization can legitimately authorize another US-controlled organization to function as arbiter of "the global standard in public affairs education."

¹⁵ NASPAA, *Annual Roster of Accredited Programs*, September 1, 2023.

¹⁶ Economist Intelligence Unit, *Democracy Index 2022*, pages 7-11.

¹⁷ V-Dem Institute, *Democracy Report 2023*, page 39.

¹⁸ V-Dem Institute, *Academic Freedom Index Update 2023*, pages 2-3.

CHEA's 2014 decision to authorize NASPAA as the global standard-setter would have been less problematic if NASPAA had globalized its governance structure over the following decade. As we shall see, NASPAA did not do this. A decision to re-accredit NASPAA as the global standard-setter, while knowing of this failure, would raise questions about CHEA's commitment to "collaborative discourse ... across the globe."¹⁹

A second procedural concern is about access to information. CHEA says that it has a "commitment to transparency in decision-making."²⁰ The opportunity to comment means little without access to relevant information. This is an established principle of administrative law.²¹ However, CHEA has declined to release documents submitted by NASPAA for this re-accreditation decision, as well as interim reports submitted by NASPAA to CHEA since 2014.²² It is impossible to comment properly on the case for re-accreditation without access to these documents.

These restrictions on transparency are important because the CHEA re-accreditation process is the only mechanism by which many stakeholders can hold NASPAA accountable for its behavior as "the global standard-setter" and self-described voice of "a global community." As NASPAA itself acknowledges—see below—financial and logistical barriers make it impossible for many non-US stakeholders, particularly those in the Global South, to participate in NASPAA decision-making.

Compounding this difficulty is a lack of transparency within NASPAA. CHEA Standard 3.M states that accrediting organizations should provide "opportunities for participation by higher education professionals, the public, and practitioners in accreditation activities, such as accreditation reviews [and] decision-making." But NASPAA, unlike CHEA, does not provide public notice of applications for accreditation and does not provide an opportunity for public comment on applications.²³ Like CHEA, NASPAA does not release documents relating to applications for accreditation.

¹⁹ CIQG, *Statement of Purpose*, <https://www.chea.org/ciqg-statement-purpose>. Accessed January 5, 2024.

²⁰ CHEA, "Value of recognition," September 2022.

²¹ "To suppress meaningful comment by failure to disclose the basic data relied upon is akin to rejecting comment altogether ... The inadequacy of comment in turn leads in the direction of arbitrary decision-making." *United States v. Nova Scotia Food Products Corp.*, 568 F.2d 240 (2d Cir. 1977).

²² E-mail communications with CHEA staff, January 2 and 4, 2024.

²³ COPRA, *Peer Review and Accreditation Policy and Procedures*, August 2020.

NASPAA is not a global organization

For ten years, NASPAA has represented itself as a "global organization," a "global institution," and a "global leader." The facts do not support these claims. NASPAA is dominated and controlled by US actors, as it was before 2014.

NASPAA has made no significant progress in improving non-US representation in its governance structures. As Table 2 shows, NASPAA's Executive Council and its Commission on Peer Review and Accreditation (COPRA) continue to be US-dominated bodies. The same two institutions—Maastricht University and Tsinghua University—have provided all or most of the non-US representation on the Executive Council for the last five years. NASPAA has never had a president from an institution located outside the United States.²⁴ COPRA has never had a non-US chair.²⁵

	Executive Council		COPRA	
	US institutions	Non-US	US institutions	Non-US
2024	16	2	16	1
2023	16	2	16	1
2022	16	2	15	2
2021	15	3	n/a	n/a
2020	15	3	n/a	n/a

Applying criteria used by the Union of International Associations (UIA), NASPAA cannot be described as an international organization, let alone a global one. According to the UIA, "voting power [in an international organization] must be such that no one national group can control the organization." The UIA specifically excludes "'international' unions and societies operating in North America on budgets derived almost wholly from the United States members."²⁶

By contrast, the Board of Management of the International Association of Schools and Institutes of Administration (IASIA), which also provides international accreditation

²⁴ <https://www.naspaa.org/past-naspaa-presidents>. Accessed January 5, 2024.

²⁵ NASPAA, *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position* (September 2023), 10.

²⁶ UIA, *Types of International Associations*, <https://uia.org/archive/types-organization/toy>. Accessed January 18, 2024.

services, includes representatives from twenty countries.²⁷ The five-member board of the European Association for Public Administration Accreditation (EAPAA) includes representatives from five countries, while its seven-member accreditation committee includes representatives from seven countries.²⁸ The seven-member executive committee of the Association of Professional Schools of International Affairs (APSIA) includes representatives from five countries.²⁹

The persistence of US control within NASPAA is further illustrated by the composition of committees and site visit teams. On its website, NASPAA identifies twenty-two committees other than COPRA. Of the ninety-four individuals serving on these committees, only four are affiliated with non-US institutions. None of the 101 site visitors who worked on NASPAA accreditation in 2021-2022 were affiliated with institutions outside the United States.³⁰ Eighty-one of 84 site visitors in 2022-23 came from US institutions.³¹

The persistence of US control is easily explained. Although NASPAA announced a change in mission in 2014, it made no changes in governance structures to ensure adequate global representation. NASPAA does not reserve seats on the Executive Council or COPRA for non-US representatives. It does not use other mechanisms—such as ex officio or appointed positions on its decision-making bodies for non-US representatives, or international consultative panels—to ensure a diversity of voices in governance and standard-setting. It does not appear to require a minimum level of non-US representation on site-visit teams.

Financial and logistical hurdles—including the institutional membership fee, the difficulty and cost of attending NASPAA conferences, and high accreditation costs—have also discouraged non-US participation in NASPAA. An internal NASPAA review completed in 2023 acknowledged that NASPAA's "international programs tend to be in well-funded and elite institutions."³²

²⁷ "IASA Board of Management (2022-2025)," <https://iasia.iias-iisa.org/governance.php>. Accessed January 5, 2024.

²⁸ "Organization of EAPAA," <https://eapaa.eu/organisation#the-eapaa-board>. Accessed January 5, 2024.

²⁹ "APSIA welcomes new executive committee for 2023-25," June, 2023. <https://apsia.org/apsia-welcomes-new-executive-committee-2023-25/>. Accessed January 5, 2024.

³⁰ 2022 NASPAA Conference Program, 43-45.

³¹ 2023 NASPAA Conference Program, 88-90.

³² *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position*, 6.

NASPAA has failed to take other steps that would improve international participation. Its annual conference has always been held in the United States. The 2023 conference did not allow for virtual participation. For academics in the Global South especially, the cost of attending a NASPAA conference—visa, airfare, registration, hotel and incidentals—is prohibitively high. The total cost of attendance, assuming a visa can be obtained, is well over the per capita GDP of many Global South countries. In 2022, the last year for which data is available, only five percent of conference attendees came from non-US institutions.³³

NASPAA conferences are designed primarily for US participants. In NASPAA's 2023 internal review, non-US scholars said that "conversations at NASPAA conferences and committees are too American. The concerns that rise to the top of committee agendas tend to be American concerns and non-US programs feel left out of the conversation ... Domestic and international separation in panels seemed to encourage two distinct conference experiences for domestic and international participants."³⁴ Of the 37 individuals who served on NASPAA conference planning committees in 2022 and 2023, only four were affiliated with institutions outside the United States.³⁵

NASPAA neglects academic freedom

CHEA identifies academic freedom as a core value in accreditation. CHEA president Judith Eaton said in 2020 that academic freedom is "a matter of pressing concern all of the time, but particularly pressing at this moment for a variety of reasons in different countries."³⁶ CHEA highlighted academic freedom as a theme for its 2024 annual conference.³⁷ As CHEA says in its *Standards and Procedures*, colleges and universities are "the bedrock of social change." For this reason, they should be able to "foster free thinking, individualism, and freedom of just the simple right to 'be.'"³⁸

³³ *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position*, 3.

³⁴ *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position*, 6.

³⁵ 2022 NASPAA Conference Program, 36; 2023 Conference Program, 82.

³⁶ CHEA/CIQG Webinar, "The Future of Academic Freedom," June 17, 2020.

³⁷ *2024 CHEA/CIQG Annual Conference: Call for Proposals*.

³⁸ CHEA, *Standards and Procedures for Recognition*, (October 2021), pages 2 and 9.

Academic freedom is incorporated in CHEA Standard 1 (Academic quality). As CHEA explained in a 2012 joint statement with the AAUP, "institutional autonomy and faculty academic freedom bear directly on the quality of higher education." In that statement, CHEA advised accrediting organizations to:

Emphasize the principle of academic freedom in the context of accreditation review, stressing its fundamental meaning and essential value.

Affirm the role that accreditation plays in the protection and advancement of academic freedom.

Review current accreditation standards, policies and procedures with regard to academic freedom and assure that institutions and programs accord with high expectations in this vital area.

At accreditation meetings and workshops, focus on challenges to academic freedom, with particular attention to the current climate and its effect on faculty, institutions and programs.³⁹

NASPAA has failed to do any of this. There is no mention of academic freedom in NASPAA accreditation standards. NASPAA has no policy or committee on academic freedom. Academic freedom is not mentioned in its 2023 strategic plan. There was no mention of academic freedom anywhere in the 2023 NASPAA conference program.

NASPAA applies a de facto double standard on academic freedom

As a practical matter, US-based NASPAA programs must respect academic freedom, even though it is not explicitly referenced in NASPAA standards. Institutions are only eligible for NASPAA accreditation if their program is already "accredited (or similarly approved) by a recognized regional, national, or international agency."⁴⁰ Regional accrediting organizations in the United States require a commitment to academic freedom. As an

³⁹ AAUP and CHEA, *Advisory Statement on Accreditation and Academic Freedom* (October 2012).

⁴⁰ NASPAA, *Accreditation Standards* (October 2019), 2.

illustration, the New England Commission on Higher Education requires that an accredited institution "protects and fosters academic freedom for all faculty."⁴¹

Accrediting bodies in other countries, especially authoritarian states, might not require a commitment to academic freedom or take that commitment seriously. However, NASPAA standards do not explicitly require a determination of whether the accreditations that are necessary for eligibility include a credible commitment to academic freedom. In addition, NASPAA does not explicitly identify academic freedom as one of its criteria for program accreditation.

The result is that NASPAA applies a double standard on academic freedom. There is a *de facto* requirement for American programs at the eligibility stage, but no requirement for non-American programs. This violates CHEA's substantial equivalence requirement, as well as NASPAA's promise to "[strive] for consistency in its decision-making."⁴²

NASPAA standards and practices are also inconsistent with the recommendation of the United Nations Educational, Scientific and Cultural Organization (UNESCO), which states that "the principle of academic freedom should be scrupulously observed" and that higher education institutions "should be accountable for [the] effective support of academic freedom and fundamental rights."⁴³ UNESCO's Global Convention on Higher Education, which entered into force in 2023, also emphasizes "the need to uphold and protect the principles of academic freedom and of the autonomy of higher-education institutions."⁴⁴

NASPAA ignores restrictions on academic freedom in China

NASPAA's double standard on academic freedom is most obvious with regard to its work in China. NASPAA would not accredit a US-based program if it were subject to restrictions on academic freedom like those documented in China. By contrast, NASPAA does not explicitly consider academic freedom when considering applications from China.

⁴¹ New England Commission of Higher Education, *Standards for Accreditation* (January 2021), Standard 6.12.

⁴² NASPAA, *CHEA Eligibility Application* (October 2012), 2.

⁴³ UNESCO, *Recommendation Concerning the Status of Higher-Education Teaching Personnel*, adopted by the General Conference at its 29th session, November 1997, articles 22 and 27.

⁴⁴ UNESCO, *Global Convention on Higher Education* (2019, entry into force 2023), preamble.

Evidence of restrictions on academic freedom in China is overwhelming. Of the 179 countries included in the Academic Freedom Index (AFI), China is eleventh from the bottom. "In China," the 2023 AFI report says, "the [Communist Party] sets the boundaries of permissible research, exchange, and academics' public speech." The report notes an "accelerated deterioration" in conditions since 2010, "with pressure on all aspects of academic freedom."⁴⁵

A 2022 review of academic freedom in Asia published by the Association for Asian Studies observed:

In terms of size, scope, and depth, academic freedom has arguably suffered the greatest under China's authoritarian leaders. China's uncomfortable relationship with academic freedom is nothing new ... Yet, under the current Xi Jinping administration, the space for international collaboration and foreign scholarship has been greatly diminished, authorities have issued blanket warnings against critical scholars, and regime leaders have called for thorough campaigns and party building on university campuses.⁴⁶

In its 2023 *Free To Think* report, Scholars At Risk observed:

Chinese authorities repressed scholars and students for expressive activity critical of the Chinese government. An extensive national and international surveillance apparatus facilitated this repression ... China has continued to imprison and prosecute prominent scholars, particularly those from the Uyghur community ... Surveillance by students threatened Chinese scholars' academic freedom in the classroom, reportedly causing them to adhere to more "scripted" teaching methods ... Chinese authorities also reinforced political and ideological indoctrination in universities ... [and] sanctioned students for their expressive action.⁴⁷

In its most recent human rights report on China, the US State Department also documented restrictions on academic freedom and observed:

⁴⁵ V-Dem Institute, *Academic Freedom Index Update 2023* (March 2023), pages 3 and 7.

⁴⁶ Gueorguiev, Dimitar, ed. *New Threats to Academic Freedom in Asia* (Association for Asian Studies, 2022), 26.

⁴⁷ Scholars At Risk, *Free To Think 2023*, <https://www.scholarsatrisk.org/resources/free-to-think-2023/#china>. Accessed January 5, 2024.

The government continued to restrict academic and artistic freedom and political and social discourse at colleges, universities, and research institutes. Restrictive Central Propaganda Department regulations and decisions constrained the flow of ideas and persons. Many intellectuals and scholars, domestically and abroad, exercised self-censorship, anticipating that books or papers on political topics would be deemed too sensitive to be published ... *The government and the CCP Organization Department controlled appointments to most leadership positions at universities, including department heads* ... Censorship, indoctrination, and surveillance across all universities led to narrower student participation in academic discussion and a further erosion of academic freedoms.⁴⁸

On January 19, 2024, *Radio Free Asia* reported that "the Chinese Communist Party is taking a direct role in the running of universities across the country amid ongoing mergers of embedded party committees with presidents' offices."⁴⁹ One university discussed in this report has a NASPAA-accredited program and is represented on NASPAA's Executive Council.

Of course, the fact that academic freedom is generally threatened within a country should not preclude the accreditation of a specific program within that country. However, evidence about overall threats to academic freedom ought to put accreditors on alert when examining a specific case. There should be careful deliberation about whether an adequate amount of academic freedom exists within the institution applying for accreditation, notwithstanding general conditions. Presently, NASPAA does not engage in this sort of deliberation. NASPAA accreditation standards do not explicitly authorize a conversation about academic freedom. NASPAA has no policy or committee on academic freedom.

⁴⁸ U.S. Department of State, *2022 Country Report Human Rights Practices: China*, p. 46. Emphasis added.

⁴⁹ Ting, Gu. "China's ruling party takes direct control of country's universities." *Radio Free Asia*, January 18, 2024. <https://www.rfa.org/english/news/china/china-universities-01182024160231.html>.

NASPAA applies a double standard on rights advocacy

Academic freedom is not the only area in which CHEA's substantial equivalence requirement has been breached. NASPAA also has a double standard about advocacy for democracy and civil rights.⁵⁰ NASPAA advocates for US citizens but refuses to advocate for people in other countries with NASPAA member schools and accredited programs.

The NASPAA Policy Issues Committee is "charged with identifying issues and formulating recommendations for NASPAA action" and plays a role in the drafting of NASPAA's policy statements.⁵¹ In 2022-23, the Policy Issues Committee was composed entirely of representatives from US institutions.⁵²

Recent NASPAA statements have included:

A June 2020 statement in response to the murder of George Floyd, condemning "systemic racism and systemic injustice against Black people in the United States," and promising that NASPAA, "as a global standard in public service education" would work to "dismantle systemic racism."⁵³

An October 2020 statement from NASPAA, "representing a global community of 320 schools of public governance and administration," calling on the US Congress to uphold "the ideals of American democracy" by reversing a Trump executive order on critical race theory.⁵⁴

An October 2020 statement from NASPAA, representing "a global community," calling on the US Congress to "uphold the principles of merit on which American democracy has long depended" by reversing a Trump

⁵⁰ Strictly, we can speak only of human rights, because democratic government is one of the fundamental rights: Donnelly, Jack. *Universal Human Rights in Theory and Practice*. 3rd ed. (Cornell University Press, 2013), Chapter 13.

⁵¹ "NASPAA Advocacy/Policy Center," <https://www.naspaa.org/resources/advocacy-policy-center>. Accessed January 5, 2024.

⁵² "Policy Issues Committee," August 22, 2022. <https://web.archive.org/web/20220816192356/https://www.naspaa.org/about/governance/committees/policy-issues-committee>. Accessed January 5, 2024.

⁵³ *Facebook*, June 11, 2020.

⁵⁴ *NASPAA Statement on Executive Order 13950*, October 12, 2020.

executive order to expand political appointments in the U.S. federal civil service.⁵⁵

A January 2021 statement issued on behalf of "NASPAA's 328 member Schools" condemning the US Capitol incursion, which "strikes at the heart of our democracy."⁵⁶

An April 2021 statement welcoming guilty verdicts in the Chauvin trial and marking the death of former US Vice President Walter Mondale, "a fierce human rights advocate and tremendous supporter of public service."⁵⁷

Many academic organizations in the United States have policies that describe the criteria and procedures they use for producing advocacy statements. NASPAA has never published such a policy. There is no publicly accessible explanation of why and how NASPAA decides to produce an advocacy statement.

NASPAA's advocacy is inconsistent and conceptually confused. NASPAA says it represents a "global community" but advocates only for American citizens. Often it defends "American democracy" or "our democracy"—a concept that makes no sense for a global organization.

Meanwhile, NASPAA refuses to make statements about equally serious controversies in other countries that are home to NASPAA member schools and accredited programs. Its October 2020 statement about partisan influence within the US civil service provides one obvious example of inconsistency. In this statement, party influence over the civil service within the US is condemned as a threat to good governance. However, NASPAA has said nothing about well-documented and pervasive party influence over the civil service and other public institutions, including universities, in China.⁵⁸

In a 2023 internal NASPAA review, non-US scholars asked why "NASPAA is more outspoken on national issues but not on international issues. It is not clear to international

⁵⁵ *NASPAA Statement on Executive Order 13957*, October 30, 2020.

⁵⁶ *NASPAA Statement Regarding the US Capitol Incursion*, January 8, 2021.

⁵⁷ *Statement from NASPAA President Laura Bloomberg regarding the Chauvin Trial*, April 22, 2021.

⁵⁸ Tsang, Steve Yui-Sang, and Olivia Cheung. *The Political Thought of Xi Jinping* (Oxford University Press, 2024, Chapter 3.

members why that is the case."⁵⁹ It should be noted that the "national/international" usage in this NASPAA report is not consistent with NASPAA's description of itself as a global rather than a US national organization.

NASPAA's double standard on advocacy is also reflected in its 2023 strategic plan. The plan states that NASPAA will "develop a lobbying strategy and federal legislative agenda with a list of policy issues and funding requests to support our schools."⁶⁰ The implication is that advocacy will be limited to the United States. Again, the phrasing of this statement is not consistent with NASPAA's description of itself as a global rather than a US national organization.

It might be argued that advocacy work is separate from NASPAA's accreditation work. However, NASPAA has emphasized that these two lines of work are intertwined. NASPAA prefaced its statements about President Trump's executive orders by saying that they were guided by its "mission to ensure excellence in education and training for public service." The link between standard-setting and policy advocacy was stated explicitly in NASPAA's statement on the Floyd murder.

NASPAA has a double standard on core values

Recently, NASPAA leaders have adopted a two-track policy on core values relating to democracy and the rule of law. Informally, NASPAA leaders are developing a normative standard on these core values that applies to US-based programs. Meanwhile, NASPAA has failed to affirm these values or incorporate them into its formal accreditation standards.

In 2023, sixty-six US public affairs schools and programs, convening as the Deans Summit, published a joint "statement of values" that includes a promise to "advance public policies that prioritize democracy [and] ... protect the core values upon which a stable democracy is based, including equity, equality, representativeness, accountability, transparency, respect, truth, and just administration of the rule of law."⁶¹

⁵⁹ *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position*, 7.

⁶⁰ NASPAA, *Strategic Plan* (February 2023), Objective 3.1.

⁶¹ Deans' Summit, *Statement of Values* (2023).

The Deans Summit and NASPAA have identical missions. The Summit describes itself as a forum for "collective action" by schools of public service that aims to set "collective priorities," identify "collective principles that represent our shared values," and "propel innovation among schools and the field of public service education writ large."⁶² However, NASPAA was also founded to encourage "more effective collective effort to advance the field," according to its second president.⁶³ In 2008, president Marvin Mandell said NASPAA aimed to develop a "collective identity" for public affairs programs.⁶⁴ President Nadia Rubaii said in 2012 that NASPAA's role is to "facilitate our recognition of what unites us and to foster the relationships to promote collective advancement."⁶⁵

Furthermore, the Deans Summit and NASPAA are largely coextensive. The Summit includes almost all highly-ranked NASPAA programs in the United States.⁶⁶ Summit programs accounted for forty-seven percent of all degrees awarded by NASPAA member institutions in the United States between 2013 and 2018.⁶⁷ In 2023, the steering committee for the Deans Summit included the president of NASPAA, the immediate past president of NASPAA, and the dean of a host school for the 2023 NASPAA conference.⁶⁸ The Fall 2023 meeting of the Deans Summit coincided with the NASPAA annual conference.⁶⁹

In effect, the Deans Summit gives US NASPAA programs the freedom to act without creating obligations for non-US NASPAA programs. While US schools convened as the Deans Summit have adopted a statement of values that prioritizes democracy and the rule of law, the same schools convened as NASPAA have not adopted a comparable statement. NASPAA accreditation standards do not mention the Summit's core values of democracy and the rule of law.

⁶² <https://www.volckeralliance.org/initiatives/deans-summit>

⁶³ Henry, Laurin. "Education for Public Service: The Origins and Founding of NASPAA" (Charlottesville VA, 2015), 6.

⁶⁴ Mandell, Marvin B. "Public Values as a Core Element of Naspaa." *Journal of Public Affairs Education* 15, no. 3 (2009): 261-267, 262.

⁶⁵ Rubaii, Nadia. "Leading by Example: Modeling Global Public Service Excellence." *Journal of Public Affairs Education* 18, no. 1 (2012): 1-8, 6.

⁶⁶ For example, it includes 27 of the top 30 programs, as ranked by *US News & World Report*. <https://www.usnews.com/best-graduate-schools/top-public-affairs-schools/public-affairs-rankings>

⁶⁷ Data obtained from <https://www.naspaa.org/data-center>. Accessed January 5, 2024

⁶⁸ <https://www.volckeralliance.org/initiatives/deans-summit>. Accessed January 5, 2024.

⁶⁹ <https://www.volckeralliance.org/news/deans-summit-members-explore-opportunities-expand-reach-and-impact-public-service-education>. Accessed January 5, 2024.

In sum, NASPAA has violated CHEA's substantial equivalence requirement. US-based NASPAA schools are collaborating within the Deans Summit to develop a core-values standard for US programs that is more rigorous than the standard for non-US programs.

NASPAA does not acknowledge or promote human rights

NASPAA standards do not mention human rights, and NASPAA has no policy or committee on human rights. This is an extraordinary oversight. NASPAA's mission is to improve the quality of education for individuals planning a career within state or parastatal institutions globally. However, NASPAA does not acknowledge human rights, the doctrine that has been the foundation for global dialogue about state responsibilities since World War II.

"All states in the contemporary world have accepted that human rights are a legitimate subject," two experts have recently written. "The global human rights regime has created a world in which a government's commitment to human rights is seen as essential to full national and international legitimacy."⁷⁰

NASPAA distinguishes itself by refusing to acknowledge democracy and other human rights in its policies and standards. The Standards of Excellence in Public Administration Education, published by the United Nations Department of Economic and Social Affairs (UN DESA) and the International Association of Schools and Institutes of Administration (IASIA) in 2008, state that the faculty and administration of public administration programs should be "absolutely committed ... to the building of democratic institutions." Accredited programs are expected to emphasize "democratic values" and "respect for individual and basic human rights."⁷¹

UNESCO has stated that higher education institutions "should be accountable for ... effective support of academic freedom and fundamental human rights."⁷²

⁷⁰ Donnelly, J., and D. Whelan. *International Human Rights*. (New York: Routledge, 2020), 19 and 147.

⁷¹ DESA/IASIA Task Force on Standards of Excellence for Public Administration Education and Training, *Final Report* (May 2008), pages 5 and 11. In 2012, IASIA established the International Commission on the Accreditation of Public Administration and Training Programs (ICAPA), which applies the DESA/IASIA standards.

⁷² UNESCO, *Recommendation Concerning the Status of Higher-Education Teaching Personnel*, article 27.

Although the Association of Professional Schools of International Affairs (APSIA) does not engage in accreditation, it has made a public commitment that its member schools will promote human rights.⁷³

NASPAA's refusal to acknowledge human rights is especially troubling given its sphere of operations. As noted in Table 1, most countries with NASPAA-accredited programs are governed by authoritarian regimes. Only four of the eleven countries with NASPAA-accredited programs endorsed the 2023 Declaration of the Summit for Democracy.⁷⁴ China has been criticized for a range of serious human rights abuses, including allegations of genocide in Xinjiang.⁷⁵ Several countries with NASPAA-accredited programs score poorly on the LGBT Equality Index. Qatar is ranked 190 out of 197 on that index.⁷⁶

Of course, a program located within an authoritarian country might still demonstrate an adequate level of commitment to human rights. As with academic freedom, judgment should only be made on the facts of a case. But NASPAA never makes such judgments, because its accreditation standards do not explicitly authorize a conversation on this subject.

According to CHEA standards, accrediting organizations should "serve institutions and programs with highest regard for integrity of practice and ethical behavior."⁷⁷ By refusing to acknowledge universal human rights, or include respect for human rights within its accreditation standards, NASPAA has failed this requirement.

NASPAA fails two basic tests

Contradictory pressures appear to shape NASPAA's policy. On one hand, NASPAA has an interest in expanding outside the United States, perhaps to compensate for membership

⁷³ APSIA, *Statement on Dignity and Equality*, June 9, 2020.

⁷⁴ U.S. Department of State, *Declaration of the Summit for Democracy* (March 2023). <https://www.state.gov/declaration-of-the-summit-for-democracy-2023/>. Accessed January 5, 2024

⁷⁵ "Biden administration formalizes genocide declaration against Beijing," *Washington Post*, March 30, 2021.

⁷⁶ *LGBT Equality Index*, <https://www.equaldex.com/equality-index>. Accessed January 5, 2023.

⁷⁷ CHEA, *Standards and Procedures for Recognition*, October 4, 2021, p. 5.

trends within the United States.⁷⁸ "[W]ell-funded ... elite schools"⁷⁹ in authoritarian or hybrid democratic-authoritarian states have proved to be a promising market. On the other hand, US programs face domestic pressure to affirm values such as democracy and the rule of law that would diminish the appeal of NASPAA accreditation within that non-US market. Larger US programs may also have overseas interests that would be jeopardized by a clear NASPAA stance on academic freedom and human rights. Smaller US programs have little interest in international affairs and are reluctant to dilute American influence within NASPAA.

The contradictions of NASPAA policies and activities stem from its attempt to manage these conflicting pressures. The overall result is an organizational strategy that fails two basic tests of accreditation.

The first test is alignment between mission, structure, and activities. NASPAA itself says that accredited programs should "align all aspects of delivery and decision-making with their mission and strategic goals."⁸⁰ NASPAA has not met this test. NASPAA describes itself as a global organization and global standard-setter but remains a US-controlled organization. The incoherence of NASPAA's strategy is further evidenced by its double standard on academic freedom, its confused advocacy statements, and its two-track approach to core values.

The second test in accreditation is moral integrity. NASPAA ought to show "the highest regard for integrity of practice and ethical behavior."⁸¹ NASPAA has not met this test. NASPAA implicates the global community of public service educators in morally questionable decisions taken almost exclusively by American scholars and administrators. It endorses programs in authoritarian states without considering academic freedom and human rights. Indeed, NASPAA does not acknowledge the existence of *universal* human rights. NASPAA invokes its status as a global leader to defend the rights of Americans,

⁷⁸ "Since 2010 80 schools/organizations have not renewed their NASPAA membership ... Of the 80 schools/organizations 60 have been located within the United States." *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position*, 8.

⁷⁹ *Report of the NASPAA Ad Hoc Committee on NASPAA's Global Position*, 6 and 7.

⁸⁰ NASPAA, *Standard-By-Standard Guidance*, <https://www.naspaa.org/standard-standard-guidance>.

⁸¹ CHEA, *Standards and Procedures for Recognition*, (October 2021), p. 5.

rather than "treat[ing] human rights globally in a fair and equal manner, on the same footing, and with the same emphasis."⁸²

NASPAA had ten years to develop a coherent, morally defensible strategy. It did not complete the task. CHEA should not re-accredit NASPAA without a clear and enforceable commitment to reform.

Sincerely,

A handwritten signature in black ink, appearing to read "Alas Roberts", with a horizontal line underneath the first part of the name.

Alasdair Roberts
Professor of Public Policy

⁸² World Conference on Human Rights, *Vienna Declaration and Programme of Action* (June 1993), Article 5.