



ANTI-CORRUPTION MAPPING AND ANALYSIS

GOVERNANCE INTEGRATION FOR STABILIZATION AND RESILIENCE IN THE MIDDLE EAST AND NORTH AFRICA (GISR MENA)

(VERSION FOR PUBLIC DEC)

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GOVERNANCE INTEGRATION FOR STABILIZATION AND RESILIENCE (GISR) IN THE MIDDLE
EAST AND NORTH AFRICA

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DISCLAIMER

The authors' views expressed in this report do not necessarily reflect the views of the United States
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ACRONYMS

ACTION	Addressing Corruption Through Information and Organized Networking
COR	Contracting Officer's Representative
CSO	Civil society organization
DEC	Development Exchange Clearinghouse
DRG	Democracy, Human Rights and Governance
FAST	Fiscal and Accounting System of Tunisia
IBGLCC	Commission on Good Governance and the Fight against Corruption
INLUCC	National Commission for the Fight against Corruption
LELSA	Libya Elections and Legislative Strengthening Activity
LOE	Level of effort
MENA	Middle East and North Africa
MSI	Management Systems International
PEA	Political Economy Analysis
USAID	United States Agency for International Development

EXECUTIVE SUMMARY

In recognition of the Biden-Harris Administration's focus on anti-corruption as a national priority, USAID's Middle East Bureau commissioned a review of anti-corruption programming in the Middle East and North Africa (MENA) region to distill learning and inform future anti-corruption program design and implementation. The research team focused on 74 USAID programs over the decade since the Arab Spring with a stated focus, in whole or in part, on anti-corruption, accountability, transparency or integrity. The review included programs with a primary focus on anti-corruption and those with another focus that contained anti-corruption sub-objectives, indicators or reporting. The researchers reviewed program documents and global evidence on programming effectiveness and interviewed USAID staff and anti-corruption experts.

A number of *key findings* emerged from the research:

USAID Anti-Corruption Programming in MENA

- The desk review identified anti-corruption-relevant programming from 2011 to 2021 primarily in the democracy, human rights and governance sector, but also in other development sectors. Public financial management programs alone accounted for 27 percent of the interventions, followed by local governance and elections programs.
- Missions funded only eight programs with a primary focus on anti-corruption, representing 11 percent of all anti-corruption relevant programs. Five of these occurred in the first half of the decade and three of these early programs were small (under \$2.7 million).
- Missions in the region did not concentrate programs with a primary focus on anti-corruption in countries with more political and civic freedom even though increased levels of freedom may improve anti-corruption prospects.
- Following host government priorities, MENA missions have not invested significant resources in anti-corruption programs in the past decade. Despite protestors' calls for tackling rampant corruption in the Arab Spring, governments by and large have not advanced anti-corruption efforts and corruption levels remain high.

Politics of Anti-Corruption

- Engaging in anti-corruption efforts entails balancing diplomacy and development priorities for missions. While anti-corruption reforms can advance development objectives across sectors, they can disrupt the status quo, which can destabilize governing coalitions and affect relations between the U.S. and host governments.
- Although political restrictions make anti-corruption programming more challenging, supporting anti-corruption is still viable with willing counterparts in specific ministries, agencies or municipalities, civil society organizations and journalists, or with less politically sensitive interventions.

Learning on Programming Interventions

- Interventions are more effective where they fit the context, benefit from political will, and are part of a broader package of reforms. Some interventions have more consistent impact across a range of

contexts, including administrative simplification, e-governance, and budget planning and financial management, but other interventions may be effective under certain conditions and may be a better choice depending on the specific manifestation of corruption and opportunities for addressing it (such as support for audits and rule of law to address grand corruption where there is political will for reform).

- Interventions have differing effects on grand and petty corruption.¹ Some may address both grand and petty corruption, depending on the context, but legislative strengthening, elections and media initiatives primarily address grand corruption and public administration and civil society initiatives primarily address petty corruption.
- Missions can advance anti-corruption objectives in sectoral programs but need to recognize the limits to that approach including fewer economies of scale, decreased ability to sequence, layer and harmonize anti-corruption interventions across sectors, and more limited options for addressing grand corruption.

The analysis generated a number of *recommendations*:

- **Recognize that different interventions address grand or petty corruption.** For grand corruption, missions should consider public financial management, horizontal accountability and vertical accountability reforms. For petty corruption, missions should consider public administration and public financial management reforms along with some horizontal and vertical accountability reforms.
- **Consider whether conditions are likely to support a given intervention.** Literacy rates, community mobilization, media freedom and other conditions may shape the effectiveness of some interventions. If conditions are not supportive for a given intervention, missions should consider alternatives, including those that have more consistent impact across a range of contexts such as administrative simplification, e-governance, and budget planning and financial management.
- **Adjust for political sensitivities.** Closed spaces in the MENA region make anti-corruption programming challenging but not off limits. Where political will is low, missions should consider focusing on administrative simplification, e-governance, public financial management, or service delivery at the local level that are less likely to trigger political sensitivities.
- **Understand and continually track political economy of corruption.** Missions should undertake anti-corruption assessments to discern the key corruption problems and opportunities for addressing them. USAID's *Anticorruption Assessment Handbook* can guide assessment of the key challenges and legal and institutional framework in a country and USAID's *Applied Political Economy Analysis (PEA) Field Guide* can help generate critical information on reform opportunities. Missions should consider the potential for anti-corruption programs to bolster authoritarian regimes; for this reason, anti-corruption programs should ideally be tied to a broader DRG strategy. Especially for staff who have less experience with working on political issues, missions should promote PEAs as a way to help approach the integration of anti-corruption in sectoral programs. Mission can opt for a lighter-touch PEA for programs with a secondary focus on anti-corruption or a larger-scale analysis for programs with a primary focus on anti-corruption.

¹ See p. 18 for definitions of grand and petty corruption.

- **Take advantage of host government commitments.** To the extent possible, programs should aim to support host government commitments to multilateral initiatives, such as the United Nations Sustainable Development Goals, Extractive Industries Transparency Initiative or the Open Government Partnership, to increase the likelihood of program success and help mitigate risks to reformers and civil society activists.
- **Consider support to civil society and media, among other initiatives, in more open environments.** In countries with more freedoms, like Tunisia, Lebanon and Morocco, missions should explore support for civil society and media, along with international initiatives, sectoral programming and less politically sensitive interventions, if host governments are less receptive to support for anti-corruption programming.
- **Coordinate programs with a primary and secondary focus on corruption.** Missions should track interventions across sectors and strategize on their harmonization, sequencing and layering.
- **Manage expectations with USAID leadership on the medium- to longer-term time frame for seeing results.** Anti-corruption programs often face resistance and require more sustained engagement than other types of development assistance with more immediate returns on investment.
- **Design flexibility into programming.** Given the politics involved in disrupting corrupt arrangements, anti-corruption programs must operate with flexible designs, contracting vehicles or programming approaches that enable iterative adaptation.
- **Support diplomatic engagement and donor coordination.** Especially where host government commitment to anti-corruption is weak or uneven, programs should take advantage of coordination groups and seek to coordinate messaging and interventions with the Embassy and across the donor community to bolster political will.

INTRODUCTION

USAID recognizes corruption² as a significant barrier to development and has identified fighting it as a cross-cutting priority. The Biden-Harris Administration has underscored this focus by asserting anti-corruption as a core U.S. national security interest, as noted in the National Security Study Memorandum issued June 3, 2021. Reinforcing this message, USAID Administrator Samantha Power has referred to corruption as “a problem-amplifier,” complicating efforts to address development challenges and to support countries’ progress toward self-reliance. Affecting almost all sectors, corruption undercuts investments to improve lives—from global health priorities like COVID-19 to climate change, conservation, education and livelihoods—and disproportionately burdens the most vulnerable members of society. Corruption also distorts nations’ priorities away from public interests and breaks down trust in institutions, undermining support for democracy and fueling authoritarianism, extremism and insurgency. It also enables crime groups to operate and contributes to impunity and lawlessness.

USAID has produced valuable tools for developing anti-corruption programs³ and support interventions aimed at preventing corruption and enforcing sanctions for corrupt acts. These include efforts to improve transparency, accountability and independence of public institutions; strengthen anti-corruption agencies; support justice systems’ investigation, prosecution and adjudication of corruption cases; raise awareness of the costs of corruption; foster social behavior change; and support civil society and media to act as watchdogs. While programs with clear anti-corruption goals advance these efforts, many more have other goals but advance these efforts through anti-corruption components. Capturing the full range of anti-corruption relevant programs is therefore challenging. In some countries, moreover, political sensitivities push USAID to avoid reference to corruption in program documents, even if the program contributes to anti-corruption objectives.

To improve and expand its anti-corruption work, USAID requires a systematic accounting of relevant past and ongoing programming. A comprehensive review of this work in the Middle East and North Africa (MENA) region over the decade since the Arab Spring, detailing program approaches and effectiveness, will advance technical knowledge in this area, enabling USAID to design and implement more successful programming in the region. A literature review will further augment this learning.

This analysis presents learning from USAID programming in the MENA region and global evidence on programming effectiveness in eight sections. The introduction describes why USAID is interested in furthering its knowledge of anti-corruption programming; the second section describes what USAID hopes to achieve with this study and the methodology and limitations of the research. The report then analyzes patterns of anti-corruption programming in MENA, the politics of anti-corruption programming, learning on programming options, and other programming considerations in sections three through six. We present conclusions and recommendations for future anti-corruption programming in sections seven and eight. The annex contains a selected bibliography.

² Following USAID’s policy, we define corruption as “the abuse of entrusted authority for private gain.” USAID Anticorruption Strategy, Washington, D.C., 2005: pg. 8. <https://www.usaid.gov/sites/default/files/documents/1868/200mbo.pdf>

³ USAID’s anti-corruption tools are available here, <https://www.usaid.gov/what-we-do/democracy-human-rights-and-governance/technical-publications>

STUDY OBJECTIVES AND METHODOLOGY

OBJECTIVES

The goal of this analysis is to maximize the impact of future USAID investments in anti-corruption relevant programs in the MENA region. For this, it is necessary to conduct a stocktaking of programming and its effectiveness to inform future anti-corruption program design and implementation. The analysis aims to map existing and past programs relevant to USAID anti-corruption objectives in the MENA region, review approaches and results, and distill lessons from programs and a literature review to inform future programming and related learning needs.

METHODOLOGY

To undertake this review, the research team catalogued USAID programming and analyzed the results in combating corruption in MENA over the past decade. The criterion for including a program in the database was its stated focus, in whole or in part, on anti-corruption, accountability, transparency and/or integrity. The database included programs with a primary focus on anti-corruption and those with another focus that contained anti-corruption sub-objectives, indicators or reporting. Those with a primary focus on anti-corruption met one or both of the following criteria: 1) they supported the anti-corruption agency, supreme audit institution, or anti-corruption civil society organization (CSO) or coalition in the country; or 2) the name of the project included corruption, accountability, transparency or integrity⁴. Programs with a secondary focus on anti-corruption contained anti-corruption sub-objectives, indicators, or reporting, but did not meet the criteria for a primary focus on anti-corruption.

While most, if not all, democracy, human rights and governance (DRG) programs contribute to accountability systems (and therefore to anti-corruption efforts) at least to some extent, the research team only included programs that referenced doing so in their documentation. For example, although increasing voter education and participation in elections may enable voters to hold elected officials accountable and therefore provides an indirect support to anti-corruption goals, most elections programs do not identify anti-corruption as a specific objective and do not report on or measure it in reports. Therefore, we did not include those programs in our database. However, if an elections program had a specific focus on integrity in elections, election monitoring, money in politics or political party financing, for example, we included it in our database as a program with a secondary focus on anti-corruption. Similarly, if legislative strengthening programs supported constituent relations, committee management, or resource centers, for example, we did not include them in our database, but we did include programs that supported legislative oversight committees or drafting of anti-corruption legislation as programs with a secondary focus on anti-corruption.

DATA COLLECTION

Using the selection criteria described above, the research team identified 74 programs that operated in MENA between 2011 and 2021 where anti-corruption was either a primary or secondary focus. The research team identified this sample of relevant programs via multiple avenues. First, it drew from the

⁴ For example, the Responsive Governance Project supported the Supreme National Authority for Combating Corruption and the Central Organization for Control and Audit in Yemen and the Addressing Corruption Through Information and Organized Networking (ACTION) Program included corruption in the project name so they are both coded as programs with a primary focus on anti-corruption.

program inventory found in USAID's *Analysis of USAID Anticorruption Programming Worldwide (2007-2013)*. Second, USAID's MENA bureau provided a list of programs. Third, the research team examined the websites of all missions in the region. Fourth, the team conducted keyword searches on USAID's Development Experience Clearinghouse (DEC) using the keywords: corruption, integrity, transparency and accountability. For each program, the research team collected quarterly, annual and final reports, mid-term and final evaluations where available, and other documentation provided by USAID staff. The research team conducted additional interviews with anti-corruption experts in USAID and outside the agency.

DATA ANALYSIS

The research team developed a list of variables to code from the data sources. Basic program information included program name, country, start and end year, program value, implementing partner, program description, and sector. The research team analyzed interview notes and program documents to identify how USAID designed anti-corruption interventions, how effective⁵ they were, and what factors shaped their effectiveness. Effectiveness reflected USAID, implementing partner, and evaluators' judgments that were based on qualitative evidence but only sporadic quantitative data. When considering what worked or did not work, the research team noted support for anti-corruption in the host country government, civil society, Embassy, and donor community. The research team also considered the level of political freedom and corruption in each country as measured by Freedom House scores and the World Bank's Control of Corruption indicator.

To supplement the learning from this set of programs, the research team conducted a literature review focused on lessons learned in fighting corruption and evidence on anti-corruption programming effectiveness.

LIMITATIONS

One limitation to conducting and analyzing the research was the lack of clarity regarding what counts as an anti-corruption program. USAID does not have a code that applies to the diverse range of anti-corruption programming, so the research team needed to propose a methodology for capturing anti-corruption relevant programs, as discussed above. This approach may have missed some programs with a secondary focus on anti-corruption.

Another limitation to the research was the limited reporting on corruption in the available program reports. Of the eight programs with a primary focus on anti-corruption, the research team found only one final report and no annual reports, mid-term evaluations or final evaluations. Reporting from programs with a secondary focus on anti-corruption often had no or little reference to corruption. Another limitation was the low number of evaluations that were available (19) and limited discussion of corruption in the evaluations as corruption was not a primary focus in any of them. In fact, only two evaluations discussed corruption at all.

In recognition of these limitations, the research team relied on interviews with USAID staff, who were directly involved in relevant programming to elucidate how the context influenced the design of the

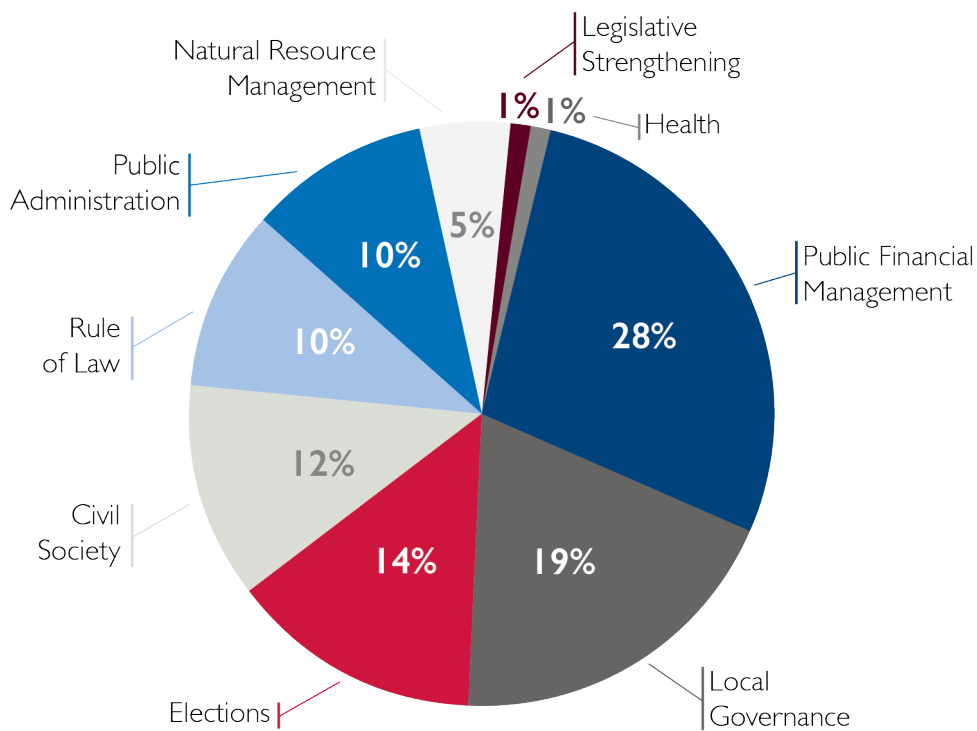
⁵ We use the term "effective" to mean whether a program was successful in producing an intended result.

programs and how the programs impacted corruption. To reduce the burden on mission staff, the research team conducted no more than two interviews with each mission.

USAID ANTI-CORRUPTION PROGRAMMING IN MENA

The desk review identified anti-corruption-relevant programming primarily in the DRG sector, but also in other development sectors. Public financial management projects alone accounted for 27 percent of the interventions, followed by local governance and elections programs. Anti-corruption relevant interventions occurred least often in natural resource management (specifically, water and wastewater) and health programs (see Figure 1). Almost two-thirds of the programs included support for civil society; however, the research team only coded projects as civil society when that was their primary focus.

Figure 1. Percentage of Projects by Sector



Over this period, missions funded only eight programs with a primary focus on anti-corruption, representing 11 percent of all anti-corruption relevant programs. Five of these occurred in the first half of the decade and three of these early programs were small (under \$2.7 million).

Missions in the region did not concentrate programs with a primary focus on anti-corruption in countries with more political and civic freedom. There is no clear pattern of programs with a primary focus on anti-corruption across the three categories of countries by freedom as categorized by Freedom House. In principle, one would expect increased support for explicit anti-corruption programming in countries with more freedom since political will and civic engagement—two key factors in the effectiveness of anti-corruption programs—are more likely to be constrained in countries with limited freedom.

However, dynamics within a country can have more bearing on programming decisions than the level of freedom. In Egypt, for example, the president has advanced anti-corruption reforms since the revolution in 2014; he is committed to reducing petty corruption to improve service delivery and increase citizen satisfaction. Despite the constraints on freedom, the mission works effectively with willing counterparts on anti-corruption.⁶ By contrast, the political context in Tunisia is very fluid, making explicit anti-corruption work challenging despite the relatively higher levels of freedom. The status of the main anti-corruption institutions illustrates the instability. The post-revolution government established the National Commission for the Fight against Corruption (INLUCC) in 2011, and 2017 legislation authorized a permanent body, the Commission on Good Governance and the Fight against Corruption (IBGLCC) to replace it. However, the government has yet to establish the new body and closed the old one in 2021 for its poor performance.⁷

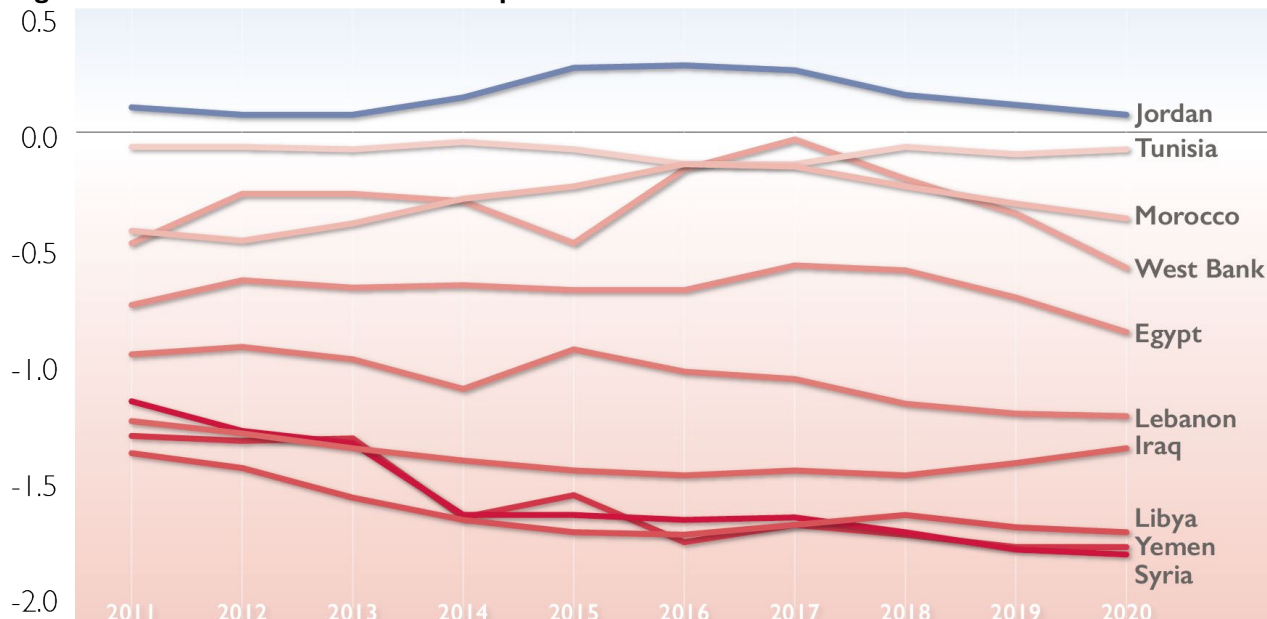
Table 1. USAID Anti-corruption Programming Focus in MENA by Freedom Rankings, 2021

Free	Partly Free	Not Free
Country	Country	Country
Tunisia	Lebanon	Egypt
	Morocco	Iraq
		Jordan
		Libya
		West Bank/Gaza
		Yemen

⁶ Author’s interview with USAID/Egypt staff. October 25 and 27, 2021.
⁷ Tunisia, Freedom in the World 2021: <https://freedomhouse.org/country/tunisia/freedom-world/2021>

Overall, MENA missions have not invested significant resources in anti-corruption programs in the past decade. USAID’s lighter emphasis on anti-corruption compared to other programming objectives corresponds with host government priorities and initiatives. Despite protestors’ calls for tackling rampant corruption in the Arab Spring, governments by and large have not advanced anti-corruption efforts and corruption levels remain high (see Figure 2).

Figure 2. World Bank Control of Corruption



POLITICAL ECONOMY ANALYSIS

For the most part, missions conducted political economy analysis (PEA) to guide their anti-corruption relevant programming. Interviewees acknowledged that PEA helps missions understand the operating environment, identify opportunities for reform, and align their project with political will. Some noted that PEAs often lack the critical nuance needed to inform program design or programmatic shifts and instead provide snapshots of big picture politics that are beyond USAID’s ability to influence. To provide this nuance, one mission advocated using local actors, who have a deeper understanding of the context and can connect with more informed stakeholders than expatriate consultants. Another interviewee suggested that quantitative information, like surveys of beneficiaries, could complement qualitative research to better inform PEA findings.

Where projects are countering corruption as a secondary objective, however, PEAs may not focus sufficiently on corruption. Such a focus is needed to guide anti-corruption interventions since corruption operates through informal networks. PEAs for anti-corruption relevant programs need to look at corruption networks and their intersection with the ruling coalition as well as the networks of reform champions. The analysis needs to ask who has an interest in countering corruption, who has an interest in preserving the status quo, and what drives these interests. This understanding can help to identify possible pathways and entry points for countering corruption.

LEARNING ON PROGRAMMING OPTIONS

A range of interventions can support anti-corruption objectives. These include enforcement actions for corrupt acts, preventive actions in public administration, and social and behavior change efforts. Different types of corruption call for different responses: increasing civil servant wages may not address bid rigging in procurement, for example. Selecting appropriate measures in response to key areas of corruption is a first step in achieving results. USAID's *Anticorruption Assessment Handbook* or other assessment frameworks can provide useful guidance on analyzing the issue and evaluating possible responses.

Different political contexts also influence the effectiveness of interventions. For example, levels of media freedom influence the ability of investigative journalists to expose corruption. Among USAID missions in the MENA region, this is a notable constraint as only Tunisia ranks in the top half of the 2021 World Press Freedom Index.⁸ Similarly, the conduct of free and fair elections influences the ability of citizens to replace officials after media reporting exposes their misconduct. Overall, anti-corruption efforts are more likely to be effective when there are political freedoms and constraints on power that enable political opponents to challenge incumbents, citizens to hold government officials accountable through elections or advocacy, and oversight agencies and judiciaries to operate independently. For any given context, anti-corruption efforts are more likely to be effective when they recognize political constraints and tailor responses accordingly.

Anti-corruption measures are also more effective when there is political will for anti-corruption reform. In a review of USAID anti-corruption programs in sub-Saharan Africa, political will emerged most prominently as a key determinant of program success or failure: “Strong political will to implement anti-corruption reforms among political leaders could catalyze efforts within government and civil society to advance reform, whereas weak or absent political will could stall them.”⁹ Other research on anti-corruption reform strongly supports this finding.¹⁰

Anti-corruption efforts are also more likely to be effective when they are part of a broader package of reforms. Increasing citizen demand for accountability, for example, is more effective when combined with efforts to increase public officials’ supply of good governance. Efforts to address corruption at the subnational level will also be more effective when combined with efforts to promote anti-corruption laws and institutions at the national level. Likewise, awareness raising campaigns advocating zero tolerance for corruption will be more effective when combined with such initiatives as streamlining and digitizing citizen services that reduce bureaucratic delays and improve access to services.

With these considerations in mind, we present below a list of interventions that can support anti-corruption efforts. For each intervention, we discuss what it is, its effectiveness, and the conditions shaping its effectiveness. This approach affirms the assertion made in U4’s 2021 report on how to curb corruption: “Rather than a binary analysis of their impact – as effective or not – we need to understand whether, why, to what extent, under what circumstances, in which contexts, in which combinations, and for whom anti-corruption efforts have a direct or indirect impact on corruption levels.”¹¹

⁸ Global ranking: <https://rsf.org/en/ranking#>

⁹ Phyllis Dininio and Brian Calhoun. 2018. *USAID Anti-Corruption Program Efficacy in Sub-Saharan Africa*. Washington, DC: USAID, p. 12.

¹⁰ For example, Robert I. Rotberg. 2017. *The Corruption Cure: How Citizens and Leaders can Combat Graft*. Princeton, NJ: Princeton University Press.

¹¹ Cecilie Wathne. 2021. “Understanding corruption and how to curb it: A synthesis of latest thinking.” Bergen, Norway: U4, Issue No. 3, p. 26.

PUBLIC ADMINISTRATION

ADMINISTRATIVE SIMPLIFICATION

What It Is: Administrative simplification removes the opportunities for public officials to extract payments and the incentives for citizens to pay for services by eliminating unnecessary steps and standardizing operations. One-stop shops can offer streamlined services for business registration, licenses and permits, export/import operations, land titling, tax filing, utility payments, legal documents, and other government services.

Effectiveness: Efforts to streamline and simplify administrative procedures and regulations are often effective at reducing corruption.

*Strength of Evidence:*¹² Weak-Medium¹³

Conditions Shaping Effectiveness: These efforts are more effective when they target corruption issues and not just inefficiencies and when they are part of broader reform efforts, such as civil service or transparency reforms.

E-GOVERNANCE

What It Is: E-government systems diminish vulnerability to corruption by eliminating direct interaction between public officials and customers, embedding internal control mechanisms in processes, and making processes transparent to the public through online access to systems.

Effectiveness: E-government systems are often effective at reducing corruption.

Strength of Evidence: Strong¹⁴

Conditions Shaping Effectiveness: E-governance is more effective where literacy rates and access to the internet are higher.

TRANSPARENCY AND ACCESS TO INFORMATION

What It Is: Transparency and access to information on government policies, budgets, contracts, fees, and performance enable citizens to detect and report corruption and are essential to the effectiveness of a range of accountability mechanisms.

Effectiveness: Transparency and access to information are important to the effectiveness of a broad range of accountability mechanisms, such as community monitoring, public complaints mechanisms, investigative journalism and elections, but evidence of the direct impact on corruption is inconsistent.

Strength of Evidence: Medium-Strong¹⁵

Conditions Shaping Effectiveness: Transparency and access to information are more effective where literacy rates are higher, citizens see information as relevant to their lives, communities are relatively homogeneous, and state institutions are functional.

¹² The number and methodological rigor of the studies and the consistency of their findings determine the strength of the evidence, ranging from weak to strong.

¹³ USAID. 2015. *Practitioner's Guide for Anticorruption Programming*. Washington, DC: Management Systems International. https://www.usaid.gov/opengov/developer/datasets/Practitioner's_Guide_for_Anticorruption_Programming_2015.pdf

¹⁴ USAID. 2017. *Combatting Corruption Among Civil Servants*. Northwestern University.

¹⁵ Alina Rocha Menocal, Nils Taxell et al. 2015. *Why corruption matters: understanding causes, effects and how to address them: Evidence Paper on Corruption*. London: Department for International Development.

PUBLIC ADMINISTRATION

CIVIL SERVICE REFORM

What It Is: Merit-based recruitment, adequate wages, performance-based incentives, and professionalization provide positive incentives for integrity and complement penalties for abuse.

Effectiveness: Merit-based recruitment is linked with lower levels of corruption. In particular, written examinations for entry and advertising job positions tend to curb nepotism. Research also suggests that corruption emerges when salaries are below a basic living wage but that increasing wages often has a modest effect on corruption levels.

Strength of Evidence: Medium¹⁶

Conditions Shaping Effectiveness: Civil service reforms work most effectively when they combine incentives for public officials to work with integrity (such as merit-based promotions and raises) alongside other reforms to curb discretion and change social norms.¹⁷ Civil service reform is politically sensitive especially where patronage systems operate. Whereas downsizing is likely to trigger resistance from within the civil service, organizational reforms that alter staff assignments and compensation reforms that provide bonuses for performance may succeed, even where patronage systems are in place. Further, establishing job qualifications only for new applicants is less likely to trigger resistance than requiring current employees to meet such qualifications.¹⁸

DECENTRALIZATION/ LOCAL GOVERNANCE

What It Is: Decentralization brings decision-making processes closer to the people, reduces the extortion capacities of central bureaucrats and increases the accountability of local politicians to their constituents.

Effectiveness: Evidence about the effect of decentralization on corruption is inconsistent. Decentralization can either lead to increased oversight by local citizens, or increased capture by local elites, depending on context.

Strength of Evidence: Medium-Strong¹⁹

Conditions Shaping Effectiveness: Broad-based mobilization and an active media that empower citizens to hold subnational leaders and service providers accountable are critical to the effectiveness of decentralization.

¹⁶ USAID. 2017. *Combating Corruption Among Civil Servants*. Northwestern University; Jan-Hinrik Meyer-Sahling, Christian Schuster, and Kim Sass Mikkelse. 2018. "Civil service management in developing countries: what works?" London: Department for International Development.

¹⁷ Cecilie Wathne. 2021. "Understanding corruption and how to curb it: A synthesis of latest thinking." Bergen, Norway: U4, Issue No. 3.

¹⁸ USAID. 2015. *Practitioner's Guide for Anticorruption Programming*. Washington, DC: Management Systems International.

https://www.usaid.gov/opengov/developer/datasets/Practitioner's_Guide_for_Anticorruption_Programming_2015.pdf

¹⁹ Alina Rocha Menocal, Nils Taxell et al. 2015. *Why corruption matters: understanding causes, effects and how to address them: Evidence Paper on Corruption*. London: Department for International Development.

PUBLIC FINANCIAL MANAGEMENT

BUDGET PLANNING AND FINANCIAL MANAGEMENT

What It Is: Strong budget planning and financial management systems can increase transparency in accounting, recording, and reporting procedures and deter certain types of corruption. Public expenditure tracking surveys offer one approach to strengthening financial management and reducing leakage.

Effectiveness: Research consistently finds that strong budget planning and financial management systems, combined with citizen engagement in budget decisions and oversight of expenditures, reduce corruption.

Strength of Evidence: Strong²⁰

Conditions Shaping Effectiveness: These reforms are effective in many contexts but are more effective when communities are engaged in monitoring.

PROCUREMENT

What It Is: Procurement regulations and procedures that reduce discretionary decisions, increase transparency and competition, and strengthen oversight of procurement decisions can reduce opportunities for and detection of corruption.

Effectiveness: Research suggests that procurement reforms can reduce corruption. The limited number of studies do not allow for a comparison of the effectiveness of different procurement reforms, such as auction type, e-procurement, or procurement monitoring.

Strength of Evidence: Weak-Medium²¹

Conditions Shaping Effectiveness: Procurement reforms are more effective when community monitoring, government oversight and transparency are used in combination.

TAX AND REVENUE SERVICES

What It Is: Improving inspections, professionalizing staffing, tightening supervision, and reducing discretion are ways of reducing corruption in tax and revenue services.

Effectiveness: Tax and revenue service reforms have reduced corruption in some cases and World Bank projects for tax administration generally have succeeded in improving governance.

Strength of Evidence: Weak-Medium²²

Conditions Shaping Effectiveness: Reforms are more effective when multiple measures are combined.

²⁰ Jesper Johnson, Nils Taxell and Dominik Zaum, 2012. "Mapping Evidence Gaps in Anti-corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption." U4 Issue October 2012, No 7.

²¹ Alina Rocha Menocal, Nils Taxell et al. 2015. *Why corruption matters: understanding causes, effects and how to address them: Evidence Paper on Corruption*. London: Department for International Development.

²² Jesper Johnson, Nils Taxell and Dominik Zaum, 2012. "Mapping Evidence Gaps in Anti-corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption." U4 Issue October 2012, No 7; and USAID. 2015. *Practitioner's Guide for Anticorruption Programming*. Washington, DC: Management Systems International. https://www.usaid.gov/opengov/developer/datasets/Practitioner's_Guide_for_Anticorruption_Programming_2015.pdf

HORIZONTAL ACCOUNTABILITY

ANTI-CORRUPTION AGENCIES

What It Is: Anti-corruption agencies take many forms, but often have responsibilities for investigating corruption allegations, preventing corruption, and educating the public about the problem and how they can contribute to a solution.

Effectiveness: Anti-corruption agencies have been effective in the well-known cases of Hong Kong and Singapore, but have had limited impact in other countries, particularly those with poor governance.

Strength of Evidence: Medium²³

Conditions Shaping Effectiveness: Political interference, limited resources, and institutional weakness have hindered the effectiveness of anti-corruption agencies. However, they may have an impact when they are independent, well-resourced and supported by government and non-government actors.

AUDITS

What It Is: Audit institutions oversee government accounts in order to ensure the proper use of public funds.

Effectiveness: There is a consistent body of evidence indicating that audits, when combined with sanctions for misdeeds, are effective in reducing corruption. Sanctions range from publicizing audit results to diminishing future funds or terminating a public official's contract.

Strength of Evidence: Strong²⁴

Conditions Shaping Effectiveness: Audits are more effective when the institutions responsible for sanctions are credible and the media and election cycles amplify audit results. For grand corruption, the effectiveness of audits also depends on the independence and political composition of legislative public accounts committees. When legislators are independent of the executive and from the opposition or a rival political faction of the accused, they have more latitude and incentive to pursue audit findings. Political interference and insufficient resources undermine the effectiveness of audit institutions.

RULE OF LAW

What It Is: A range of judicial reforms such as increasing independence in judicial appointments and tenure, automating case management, publicizing court decisions, strengthening judicial review bodies, and reducing interaction between judges and court users could potentially reduce corruption in the judiciary. In addition, a range of reforms can improve the investigation, prosecution and adjudication of corruption cases, such as support for plea bargaining; whistleblower protection; specialized investigative units, prosecutors and courts; and inter-agency cooperation.

Effectiveness: Evidence on the impact of judicial reforms on corruption is slim.

Strength of Evidence: Weak²⁵

Conditions Shaping Effectiveness: Judicial reforms are more effective where strong support from civil society and donors and well trained, professional judges check political interference.

²³ Alina Rocha Menocal, Nils Taxell et al. 2015. *Why corruption matters: understanding causes, effects and how to address them: Evidence Paper on Corruption*. London: Department for International Development.

²⁴ IBID and USAID. 2015. *Practitioner's Guide for Anticorruption Programming*. Washington, DC: Management Systems International https://www.usaid.gov/opengov/developer/datasets/Practitioner's_Guide_for_Anticorruption_Programming_2015.pdf

²⁵ Jesper Johnson, Nils Taxell and Dominik Zaum, 2012. "Mapping Evidence Gaps in Anti-corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption." U4 Issue October 2012, No 7.

LEGISLATIVE STRENGTHENING

What It Is: Legislatures can hold the executive to account through reviews of budgets and spending, public hearings, and commissions of inquiry. However, legislators may have little capacity to perform their oversight role and may refrain from checking the executive when they are from the same party or participate themselves in corrupt schemes.

Effectiveness: There is insufficient evidence on the effectiveness of legislative strengthening in reducing corruption.
Strength of Evidence: Weak²⁶

Conditions Shaping Effectiveness: Legislative strengthening is more likely to curb corruption when elections are free and fair, education and background requirements keep warlords and criminals from holding office, and competition between parties or party factions supports the legislature's oversight function.

VERTICAL ACCOUNTABILITY

ELECTIONS

What It Is: Elections can curb corruption by affording voters the ability to hold elected officials accountable but may also contribute to corruption through vote buying, illicit campaign financing, and tampering with ballots.

Effectiveness: There is evidence that education campaigns against vote buying and transparency on officials' qualifications and performance can reduce vote buying. There is little evidence that introducing campaign financing rules will reduce corruption, but this is likely because rules are often not enforced.

Strength of Evidence: Medium²⁷

Conditions Shaping Effectiveness: Elections are more likely to reduce corruption where political rights and civil liberties are stronger, transparency and access to information are greater, and economic equality is higher.

CIVIL SOCIETY

What It Is: An engaged civil society can reduce corruption by monitoring government actions, advocating for accountability, and mobilizing citizens to change their behavior.

Effectiveness: Civil society engagement can have an impact on levels of corruption, although the effect varies depending on the mechanisms used, such as citizen report cards or social audits, and the context within which they are implemented.

Strength of Evidence: Strong²⁸

Conditions Shaping Effectiveness: Conditions for success include a combination of broad-based community mobilization with professionalized CSOs, an independent and free media, engagement between state and civil society actors, functional and responsive state institutions, and credible sanctions.

MEDIA

What It Is: Investigative journalism can expose corruption and mobilize responses.

Effectiveness: There is a strong correlation between increased media freedom and lower levels of corruption across countries.

Strength of Evidence: Strong²⁹

Conditions Shaping Effectiveness: Investigative journalism is more effective at curbing corruption where the consequences—reputational, administrative or criminal—for the guilty party are greater as a result of the reporting. Investigative journalism is also a more viable intervention where risks to journalists are lower.

OTHER PROGRAMMING CONSIDERATIONS

Other considerations influence the selection of interventions, including the priority corruption concerns, host government openness to anti-corruption support, and options for integrating anti-corruption across mission portfolios. Table 2 (below) presents these key considerations for each of the interventions described above.

First, it indicates whether the intervention primarily targets grand corruption, petty corruption, or both. Grand corruption involves larger transactions and higher-level officials whereas petty corruption involves smaller transactions and lower-level officials. Examples of grand corruption include kickbacks to win large public procurements, embezzlement of public funds, and privatization to insiders at bargain prices. Examples of administrative corruption include small bribes, skimming paychecks, nepotism in appointments, selective enforcement of taxes, and absentee employees, teachers or doctors.³⁰ Understanding the kind of corruption addressed by each intervention is important for selecting appropriate interventions for the corruption that is of concern.

Second, the table indicates whether the intervention tends to be more or less politically sensitive. The situation in each country at any point in time may differ from characterizations here, but the interventions marked with a plus sign may benefit from a careful review of sensitivities in contexts that are less politically open.

Third, the table suggests how the intervention can be applied in non-DRG sectors such as health and education. Many anti-corruption interventions can be implemented through sectoral programs.

Table 2. Programming Considerations for Anti-corruption Interventions

Programming Option	Addressing Grand or Petty Corruption	Political Sensitivity of Programming	How Implemented in Sectors
Public Administration			
Administrative Simplification	Both though primarily petty		Internal and customer-facing processes and systems
e-Governance	Both though primarily petty		Internal and customer-facing processes and systems

²⁶ Jesper Johnson, Nils Taxell and Dominik Zaum, 2012. "Mapping Evidence Gaps in Anti-corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption." U4 Issue October 2012, No 7

²⁷ Jackson, David and Daniel Salgado Moreno. 2016. "What Works to Curb Political Corruption? A Review of the Evidence Base." Transparency International.

²⁸ Alina Rocha Menocal, Nils Taxell et al. 2015. *Why corruption matters: understanding causes, effects and how to address them: Evidence Paper on Corruption*. London: Department for International Development.

²⁹ IBID.

³⁰ USAID. 2015. *Practitioner's Guide for Anticorruption Programming*. Washington, DC: Management Systems International. https://www.usaid.gov/opengov/developer/datasets/Practitioner's_Guide_for_Anticorruption_Programming_2015.pdf

Transparency and Access to Information	Both though primarily petty	+	Open government initiatives and policies and mechanisms to implement access to information laws in ministries
Civil Service Reform	Petty	++	Wages, performance-based pay, and administrative sanctions
Decentralization/Local Governance	Both though primarily petty		Linkages between central ministry and local government
Public Financial Management			
Budget Planning and Financial Management	Both		Participatory budgeting and financial management systems in ministries
Procurement	Both		Procurement laws and procedures applied across ministries
Tax and Revenue Services	Both		Simplification of taxes, tariffs or duties applied to a sector
Horizontal Accountability			
Anti-corruption Agencies	Both	+	Investigations in sectors, asset declarations of ministry leaders, oversight of anti-corruption commitments and implementation across sectors, and anti-corruption awareness raising and education
Audits	Both	+	Internal audit within ministries
Rule of Law	Both	+	Transparency and accountability in courts; enhanced responsiveness of the criminal justice system to investigate, prosecute and adjudicate anti-corruption claims; and expanded access to justice and legal empowerment
Legislative Strengthening	Grand	+	Legislative oversight of programs in a sector

Vertical Accountability			
Elections	Both though primarily grand	+	Not applicable
Civil Society	Both though primarily petty	+	Community monitoring and advocacy such as scorecards and social audits
Media	Both though primarily grand	+	Coverage of corruption in a sector

The research underscored other considerations for programming, including:

TIME FRAME

Many anti-corruption interventions require longer time frames. Programs may put scaffolding in place and advance incremental change in systems, institutions, and norms but the payoff may come some years later. Some missions noted that it can be hard to secure support for anti-corruption efforts if decision makers do not understand how long it takes to effect change. Securing support for sustained anti-corruption programs requires managing expectations with leadership on the medium- to longer-term time frame for seeing results.

FLEXIBILITY TO ADJUST PROGRAMMING

Given the politics involved, anti-corruption efforts require flexibility to adjust activities to changes in the environment. One way to support flexibility is to keep objectives at a higher level instead of making them too specific. Another option is to design a multi-component activity that allows the project to move forward with some activities even if there is an impasse in one area. Another way is to issue an indefinite delivery/indefinite quantity contract with task orders that can be managed independently. Problem-driven iterative adaptation provides another way to adjust programming through piloting approaches, monitoring progress, adapting interventions and pivoting in response to new challenges and opportunities.

COORDINATION

Most missions participate in coordination groups on anti-corruption either across the mission, Embassy, or donor community. While some coordination groups serve primarily to keep members informed of their activities, others work more proactively to jointly plan activities and assess the context. One interviewee suggested that missions designate a focal point for anti-corruption, similar to gender, youth or other cross-cutting issues, to facilitate discussions among technical offices, leverage efforts across the mission, and provide guidance for mainstreaming the concept of anti-corruption in the design of existing and new programs.

CONCLUSIONS

High corruption levels but limited anti-corruption efforts. Despite the calls for governance reform in the Arab Spring, corruption levels remain high across the region. Addressing corruption is an imperative to realizing sustainable development goals, but governments by and large have not pursued anti-corruption reforms and missions in MENA have not invested significant resources in anti-corruption in the past decade.

Politically challenging contexts but some opportunities for reform. Most of the governments in the region constrain political rights, civil liberties and media freedom, which makes anti-corruption programming more challenging. However, supporting anti-corruption is still viable with a willing host government as in Egypt, willing counterparts in specific ministries, agencies or municipalities, civil society organizations and journalists, or less politically sensitive interventions. Nuanced PEAs are critical to identify and guide viable programming options. Working in partnership with others in the international community and aligning with the government's international commitments are also important ways to buttress the reform effort and help mitigate risks to reformers and civil society activists. In many cases, the Embassy and Mission leadership need to provide guidance on any possible tradeoffs between diplomatic relations and development objectives.

Different interventions required for grand and petty corruption. USAID missions can support a range of anti-corruption interventions to address grand or petty corruption but need to select the appropriate tool for the kind of corruption that is of concern. If grand corruption is the primary concern, implementing e-government and one stop shops will not address that concern and perceptions of corruption will remain high unless grand corruption is tackled. Similarly, if petty corruption is the primary concern, supporting legislative oversight and strengthening criminal prosecutions will likely not address it.

Opportunities and limitations with sectoral integration. Missions can advance anti-corruption objectives in sectoral programs but need to recognize the limits to that approach. Programs with a primary focus on anti-corruption may provide economies of scale such as supporting procurement or civil service reform throughout the government or working on legislation and institutions with a national reach. They also allow missions to strategize on sequencing and layering of anti-corruption relevant interventions across sectors and ensure their harmonization. Moreover, anti-corruption focused programs offer a broader range of interventions to address grand corruption including through rule of law, legislative strengthening, elections, and investigative journalism. More narrowly circumscribed sectoral programs can complement broader efforts to address grand corruption through such initiatives as monitoring COVID-related procurement in the health sector, reforms to concessions processes in the natural resources sector, or support for certification schemes for timber, minerals, fish and other goods.

RECOMMENDATIONS

The review generated the following recommendations for future anti-corruption programming.

- **Recognize that different interventions address grand or petty corruption.** For grand corruption, missions should consider public financial management, horizontal accountability and vertical accountability reforms. For petty corruption, missions should consider public administration and public financial management reforms along with some horizontal and vertical accountability reforms as detailed in Table 3.

- **Consider whether conditions are likely to support a given intervention.** Literacy rates, community mobilization, media freedom and other conditions may shape the effectiveness of some interventions. If conditions are not supportive for a given intervention, missions should consider alternatives, including those that have more consistent impact across a range of contexts such as administrative simplification, e-governance, and budget planning and financial management.
- **Adjust for political sensitivities.** Closed spaces in the MENA region make anti-corruption programming challenging but not off limits. Where political will is low, missions should consider focusing on administrative simplification, e-governance, public financial management, or service delivery at the local level that are less likely to trigger political sensitivities.
- **Understand and continually track political economy of corruption.** Missions should undertake anti-corruption assessments to discern the key corruption problems and opportunities for addressing them. USAID's *Anticorruption Assessment Handbook* can guide assessment of the key challenges and legal and institutional framework in a country and USAID's *Applied Political Economy Analysis (PEA) Field Guide* can help generate critical information on reform opportunities. Missions should consider the potential for anti-corruption programs to bolster authoritarian regimes; for this reason, anti-corruption programs should ideally be tied to a broader DRG strategy. Especially for staff who have less experience with working on political issues, missions should promote PEAs as a way to help approach the integration of anti-corruption in sectoral programs. Mission can opt for a lighter-touch PEA for programs with a secondary focus on anti-corruption or a larger-scale analysis for programs with a primary focus on anti-corruption.
- **Take advantage of host government commitments.** To the extent possible, programs should aim to support host government commitments to multilateral initiatives, such as the United Nations Sustainable Development Goals, Extractive Industries Transparency Initiative or the Open Government Partnership, to increase the likelihood of program success and help mitigate risks to reformers and civil society activists.
- **Consider support for civil society and media, among other initiatives, in more open environments.** In countries with more freedoms, like Tunisia, Lebanon and Morocco, missions should explore support for civil society and media, along with international initiatives, sectoral programming and less politically sensitive interventions, if host governments are less receptive to support for anti-corruption programming.
- **Coordinate programs with a primary and secondary focus on corruption.** Missions should track interventions across sectors and strategize on their harmonization, sequencing and layering.
- **Manage expectations with USAID leadership on the medium- to longer-term time frame for seeing results.** Anti-corruption programs often face resistance and require more sustained engagement than other types of development assistance with more immediate returns on investment.
- **Design flexibility into programming.** Given the politics involved in disrupting corrupt arrangements, anti-corruption programs must operate with flexible designs, contracting vehicles or programming approaches that enable iterative adaptation.
- **Support diplomatic engagement and donor coordination.** Especially where host government commitment to anti-corruption is weak or uneven, programs should take advantage of coordination groups and seek to coordinate messaging and interventions with the Embassy and across the donor community to bolster political will.

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