DRG LEARNING, EVALUATION, AND RESEARCH (DRG-LER) II ACTIVITY

ANTI-CORRUPTION LEARNING AGENDA FINAL REPORT

July 2023

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LIST OF ACRONYMS

AC	Anti-Corruption
ACA	Anti-Corruption Authority
ACTF	Anti-Corruption Task Force
ASEAN	Association of Southeast Asian Nations
AML/CFT	Anti-Money Laundering/Combatting Financing of Terrorism
ANAC	Mozambique's National Administration for Conservation Areas
CICC	*Convención Interamericana Contra la Corrupción* (Inter-American Convention Against Corruption)
CMI	Chr. Michelsen Institute
CPI	Corruption Perception Index of Transparency International
CSO	Community Service Organization
DCID	Duke Center for International Development
DRG	Democracy, Rights, and Governance
EITI	Extractives Industries Transparency Initiative
EU	European Union
FAO	Food and Agricultural Organization
FCPF	Forest Carbon Partnership Facility
FDI	Foreign Direct Investment
FIEs	Foreign Investment Enterprises
FOIA	Freedom of Information Acts
GDP	Gross Domestic Product
GIZ	*Deutsche Gesellschaft für Internationale Zusammenarbeit* (German Society for International Cooperation)
ICT	Internet Communications Technologies
HDI	Human Development Index
IDEHPUCP	*Instituto de Democracia y Derechos Humanos de la Pontifica Universidad Católica del Perú* (Institute of Democracy and Human Rights of the Pontifical Catholic University of Peru)
LAN	Local Area Network
LER	Learning, Evaluation, and Research
MEL	Monitoring, Evaluation, and Learning
MITADER	Ministry of Environment and Rural Development
MozBio	Mozambique Conservation Areas for Biodiversity and Development Project
MozDGM	Mozambique's Dedicated Grant Mechanism for Local Communities
MozFIP	Mozambique's Forest Investment Project
MRV	Monitoring, Reporting, and Verification
MVP	Minimum Viable Product
NGO	Non-Government Organization
NORC	National Opinion Research Center at the University of Chicago

NSSM	National Security Study Memorandum
NSR	Niassa Special Reserve
OAS	Organization of American States
ODA	Overseas Development Assistance
OSS	One-Stop-Shop
PAPI	Pen-and-Paper Personal Interviews
PCI	Provincial Competitiveness Index
PEA	Political Economy Analysis
PROFOR	Program on Forests
PROZORRO	*Прозоро* (Transparent)
PW	Political Will
REDD+	Reducing Emissions from Deforestation and Forest Degradation
SDC	Swiss Agency for Development and Cooperation
SFM	Sustainable Forest Management
SMEs	Small and Medium-Sized Enterprises
SOC	Serious Organized Crime
SOEs	Operations and State-Owned Enterprises
TI	Technology Information
ToC	Theory of Change
TPM	Team Planning Meeting
TWP	Thinking and Working Politically
UAH	Or *Hryvnia* (National currency of Ukraine)
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
USAID	United States Agency for International Development
USFS	United States Forest Service
VCCI	Vietnam Chamber of Commerce and Industry
VCP	Vietnamese Communist Party
VNCI	Vietnam Competitiveness Initiative
VND	Or *Đồng* (National currency of Vietnam)

ACKNOWLEDGMENTS

EXECUTIVE SUMMARY: ANTI-CORRUPTION PROGRAMMING IN LOW POLITICAL-WILL STATES

BACKGROUND

In March 2022, USAID's Center of Excellence on Democracy, Human Rights, and Governance (the DRG Center) asked the Duke Center for International Development (DCID) to participate in the DRG Center's Learning Agenda and explore answers to two learning questions: 1) What does USAID need to know to account for political-will dynamics in countering corruption; and 2) How should USAID programming to counter corruption account for and influence political will, particularly, where it is weak? From these primary questions, a set of sub-questions was derived, which are included in Annex 1 of the Executive Summary below.

DCID's research to answer these two questions evolved through three stages: 1) A literature review of the three-decade history of the role of political will in anti-corruption programming and the assembly of political economy tools for measuring the incentives and powers of political actors in developing-country settings; 2) An evaluation of the most prominent anti-corruption programming interventions based on hundreds of articles from the academic and practitioner literature, which were used to identify the four families of interventions with the greatest probability of success; and 3) Four detailed case studies of the implementation of these interventions in low political-will states to identify key ingredients for successful implementation, maintenance, and scale-up.

THE ARGUMENT IN BRIEF

Anti-corruption advocates often lament that their efforts to promote institutions and policies to combat corruption are undermined by the low *political will* of politicians and elite bureaucrats, who block their initiatives outright, slow-roll their implementation, or undermine their influence by depriving them of resources, or creating countervailing rules or institutions. Because political will is presumed to be at the core of these choices, practitioners have suggested that anti-corruption reforms must first begin with efforts to alter the will of politicians. In this report, we argue that these efforts are misguided; elite politicians, whose income or power is dependent on corruption, will not be amenable to direct anti-corruption programming, especially programming that empowers sanctioning agents (i.e., courts or special prosecutors) who will punish them for their activities. We recommend an alternative sectoral approach that aligns anti-corruption programming with mainstream policy goals that the leader wants to achieve, such as improvements in education or economic development. Here, anti-corruption enters indirectly ("through the side door") by furthering the elite's sectoral policy objectives. We further suggest four specific interventions (e-governance, transparency, procurement reforms, and social audits) that are especially suited to accompany sectoral anti-corruption strategies and use detailed case studies of Vietnam, Mozambique, Ukraine, and Peru (Annexes VII through X**)** to show how these interventions can be best implemented, sustained, and scaled up in low political-will settings.

SUMMARY OF REPORT

USAID recently refined the definition of *corruption* as "the abuse of entrusted power and influence for personal or political gain" (USAID 2022). This definition includes a range of potentially corruptible actors, including elite and local politicians, bureaucrats, and also agencies and

corporations that carry out government programming. It also covers a wide spectrum of activities ranging from petty bribery to expedite bureaucratic procedures or obtain government documents to grand corruption, such as accepting kickbacks on large-scale government procurement or payments to influence the passage or blocking of legislation.

In the context of anti-corruption programming, analysts often define *political will* **as the commitment of national or local leaders to undertake actions that reduce corruption in their jurisdictions and to sustain the costs of those actions over time (Roberts, 2017)**. In practice, there are five underlying logics informing a diagnosis of low political will. First, the politician or bureaucrat benefits personally from the corruption and is unwilling to forego the income or other pecuniary benefits that it provides. Second, a politician may owe their political power to their ability to distribute corrupt rents to other elite politicians. Third, a politician may be captured by economic actors, such as state-owned enterprises (SOEs), connected companies, or powerful oligarchs, who are resistant to reforms and put pressure on the politician to thwart them. Fourth, a powerful leader may be sincerely interested in corruption but may face roadblocks from powerful subordinates who benefit from the status quo. Fifth, lack of capacity can be confused with will; a politician may be incentivized to tackle corruption but may lack sufficient resources and expertise.

A common refrain from anti-corruption advocates and aid practitioners is that their efforts to promote institutions and policies to combat corruption are frustrated by the low *political will* **of the politicians and elite bureaucrats with whom they must work (Brinkerhoff, 2010).** These politicians block anti-corruption initiatives outright, slow-roll their implementation, or undermine their influence by depriving them of resources or creating countervailing rules or institutions. Because political will is presumed to be at the core of these choices, decades of reformers have argued that anti-corruption must begin with efforts to alter the political will of leaders. Alternatively, practitioners occasionally take the path of least resistance, targeting locations where they perceive high political will, thereby avoiding locations most in need of reform.

Reviewing the long, three-decade history of research on political will regarding corruption, we argue that the term political will is extremely problematic and inappropriate as a foundation for development programming. The concept of political will is inherently difficult to measure, resulting in a "black-box" effect. Common use of the term obscures the specific reason for low political will (i.e., personal benefit versus capture by elite interests) and can also conflate the motivation with the capacity to implement. Such opacity prevents targeted interventions for change. Usage of the term also places disproportionate agency on individual anti-corruption champions within the polity, when the literature shows that more broad-based support and commitment are necessary to sustain reform efforts. Most perniciously, common usage of the term is tautological. That is, when programs fail, analysts blame political will. When they succeed, they assume its presence.

Even if a clear operationalization of political will were possible, we argue that efforts to promote elite-level anti-corruption reforms in states characterized as having low political will are misguided. Politicians and bureaucrats in these states, whose income or power is dependent on corruption, will not be amenable to direct anti-corruption programming, especially programming such as empowering judicial investigations or Anti-corruption Agencies (ACAs), which might punish them for their activities. Moreover, these officials are savvy political operators, who cannot be easily

deceived or tricked. They will understand when even very low-level anti-corruption programming endangers their rents or power, and they will quickly move to disrupt them.

We suggest an alternative sectoral approach for aid practitioners operating in states characterized by low political will. Rather than trying to directly persuade elite officials to engage in broad-scale anti-corruption reform, which is unlikely to be successful, anti-corruption can be achieved indirectly by aligning those efforts with alternative policy goals that the politician wants to achieve. For instance, if educational reform is highly salient and critical, a corrupt leader may be willing to set aside some rents from the education sector to accomplish larger goals, such as higher graduation rates, test scores, or labor productivity. By focusing on bribery to teachers as an obstacle to achieving these larger goals, it may be possible to convince policymakers to engage, address, and reduce that particular obstacle. Notice, however, that the target of political will shifts in this conceptualization. Reform advocates are not asking leaders to use political will to resolve corruption; they are asking leaders to deploy their political will for improving education, where corruption is getting in the way—a subtle but profound difference. This approach is sometimes alternatively labeled as a policy-based, indirect, or side-door approach.

A sectoral approach requires a detailed understanding of the powers, motivations, and constraints of elite political actors and bureaucrats. To that end, the literature review uncovered several methodologies, including applied political economy analysis, context assessment tools, and technical guidance notes that have been developed to open the "black box" of political will to better inform politically feasible, technically sound interventions and strategies enabled through the efforts of a broad range of stakeholders. While some of these tools are not new, what is novel is understanding their role within sectors, in low-will contexts, and as part of a local approach throughout the program cycle. The Thinking and Working Politically (TWP) approach is particularly valuable in this setting for the precise process that it uses to identify key decision-makers and map their formal and informal powers to their political motivations (Brinkerhoff & Cassidy, 2023), helping expose the underlying impediment to reform.

Once a specific sectoral strategy is selected, practitioners must then choose the tactics for achieving the sectoral goals, particularly the interventions that can be best employed to identify and constrain corrupt activities. After evaluating dozens of practitioner reports and 130 refereed academic studies, including 33 with rigorous impact evaluations, we determined that four families of interventions have the greatest chance of success, due to their coherent theories of change, empirical support, reasonable costs, and political feasibility. These include 1) transparency initiatives to inform citizens of the impacts of government programs and policies, which allow individuals to insulate themselves from bribe requests and monitor the budgets and fiscal dispersals of local and national leaders; 2) social audits, where non-state, civil society actors are provided with monitoring tools to hold corrupt officials accountable through policy and financial reviews and related watchdog functions; 3) e-governance reforms, which reduce corruption by removing lower-level bureaucratic discretion over regulatory procedures and eliminating opportunities for malfeasance by reducing the number of administrative nodes citizens and firms must navigate to access basic services and complete standard procedures; and 4) procurement reforms, which ensure open-access to government tenders, lowering opportunities for lucrative capture of contracts by connected and bribe-paying bidders. We identified and evaluated these alongside seven other common anti-corruption interventions in Table 1 using a an illustrative and subjective grade-based scoring system.

Table 1.   Report Card: 10 Common Anti-Corruption Interventions (Strongest to Weakest)

Intervention	# of Academic Studies	# with Rigorous Evaluation	Theoretical Logic	Empirical Rigor	Costs to Implement	Political Feasibility	Overall Score
Social audits	**8**	**2**	**A-**	**B+**	**A-**	**A**	**A-**
Transparency initiatives	**20**	**10**	**B+**	**A-**	**A-**	**A**	**A-**
Procurement reforms	**14**	**3**	**B+**	**B**	**B+**	**B+**	**B+**
E-governance	**21**	**3**	**B+**	**B+**	**B+**	**B**	**B+**
Government audits	17	9	A	A	C+	B-	B+
Disclosures of personal assets	9	1	B	B-	B-	B	B-
Raising bureaucratic salaries	10	3	B-	B-	C+	B-	B-
Streamlining regulations	9	0	B	B-	B-	C+	B-
Reducing bureaucratic discretion	7	2	C	B-	B-	B+	B-
Anti-corruption Agencies (ACAs)	15	0	A	B+	D	C	B-

Digging deeper, practitioners must both implement these interventions, maintain their activities, and ensure their continuance when faced with political headwinds or leadership transitions. To provide guidance on overcoming these challenges, we study the implementation of the above anti-corruption reforms in four cases: 1) Vietnam (e-governance); 2) Mozambique (transparency initiatives); 3) Ukraine (procurement reforms); and 4) Peru (social audits).[1]

In all cases, change was permitted within the context of a window of opportunity when the status quo of "politics as usual" was suddenly and dramatically challenged. Shocks to the status quo both demonstrated the negative effects of corruption and re-aligned the incentives of entrenched elites, who had previously blocked reform efforts. Successful reforms included transparency in producing objective data, partnering with local actors who could disseminate and insert data and policy implications into public debates and policy-making processes, and

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[1] Given budget and time constraints for this report, we were limited to four cases. Consequently, a tiebreaker was necessary to determine whether we should select social audits or government audits for deeper investigation. Ultimately, we chose social audits because of the high cost and limited political feasibility of advocating for government audits, despite greater empirical support for their success.

encouraging use by journalists to create bottom-up pressure for reform. International donors and development practitioners played key roles in all four cases, but their efforts manifested at different stages in the policy development and implementation process, specifically: 1) problem identification, 2) policy development, and 3) scaling up. The key features of each case study are highlighted in Table 2.

Table 2.   Key Features of Case Studies

FEATURE	VIETNAM	MOZAMBIQUE	UKRAINE	PERU
Intervention Family	E-Governance	Transparency	E-Procurement	Social Audits
Sectoral Policy Problem of Leadership	Barriers to private sector SME development	Deforestation caused by illegal logging	Inefficient and wasteful paper-based procurement	Public dissatisfaction with public service delivery in infrastructure and healthcare
Window of Opportunity	End of elite political fight blocking	Need to redraft forestry law and hidden debt scandal	Maidan political protests in 2014	Operation Car Wash and other elite scandals
Key Domestic Partners	Business associations	Environmental NGOs	Civil Society Organizations	Civil Society Organizations
Key International Partners	USAID	United Nations and World Bank	USAID and the European Bank of Reconstruction and Development	Hewlett Foundation and Open Society Foundation
Role of Donor	Problem identification	Policy development	Policy Scale-Up	Policy Scale-Up
Project Made Data Available to Journalists and Civil Society	Yes	Yes	Yes	Yes
Evidence of Reduced Corruption in the Sector	Yes	Not yet	Yes	Not yet
Initiation Year (Years between project initiation and government anticorruption efforts))	2005 (11)	2009 (11)	2014 (2)	2016 (5)

We also offer cautionary notes based on setbacks in intervention roll-out and scale-up.

Anti-corruption in environments of low political will has a long gestation process; reformers should not expect a short, linear process between the onset of interventions and immediate reductions in corrupt activity. Reformers should avoid creating "super institutions" outside the existing government and organizational frameworks. The case studies show that these result in the marginalization of existing structures and created discontent, fragmentation, and conflict within existing institutions. Lack of coordination between policy experts and political institutions can undermine implementation, so efforts should be made to align not only incentives but also timelines and performance objectives.

RECOMMENDATIONS FOR A SECTORAL ANTI-CORRUPTION APPROACH

Drawing on our literature reviews and case studies, we suggest the following approach to the successful implementation of anti-corruption reforms in low political-will contexts.

- Identify a salient policy goal of elite political stakeholders and work with them on devising programming interventions to solve that high-level problem, where a specific type of corrupt behavior may be an obstacle to achieving that goal.

- Choose a policy intervention from our menu of high-scoring interventions (these case studies) or a new approach that has demonstrated empirical support, a clear theory of change for addressing the specific corruption type, relatively low costs, and is feasible within the local political context and compatible with the sectoral reform selected above.

- Adapt and employ recognized USAID tools for political economy analysis, such as Thinking and Working Politically (TWP) (overviewed in Section I, alongside several other tools), to identify the important national and political actors, their incentive structures, powers, and constraints, which inform our five logics of low political will. Map out the steps necessary to achieve successful political legislation and implementation of policies necessary to resolve the sectoral problem and the corresponding corruption.

- If a window of opportunity for political change is not immediately available, prepare the groundwork for change through objective research documenting the policy problem and its relationship with corruption.

- Engage in a policy of programmatic transparency, make objective data from research on reforms in the sector, including corruption reductions in the sector, publicly available, and supplement the transparency with facilitation workshops and training on how journalists, civil society actors, and local politicians can access and use the data in their work.

- Identify local partners within government agencies, NGOs, business associations, and local governments who can help localize reform approaches and insert key findings into domestic policy debates.

- Leverage the external pressure of geopolitics and global citizenship. In the Mozambique and Vietnam cases, even when political will at the national level appeared to be low, leaders and civil society indicated some willingness to align with, for example, the EU, OECD, "the West," and the UN Convention on Anti-Corruption. USAID can acknowledge, reference, reinforce, and co-create these aspirations where appropriate.

- When windows of opportunity emerge, provide resources and technical assistance for feasibility studies, roll-out, and scaling up of the anti-corruption intervention.

- Again, engage with journalists and civil society to generate bottom-up support for the intervention through transparent provision of data, thereby constraining the veto space for threatened officials.

- Monitor processes and evaluate impact throughout the program cycle to make sure the interventions are achieving program objectives and stakeholders' incentives are aligned, and use new learnings to

adjust and course corrections when problems are uncovered. Given the long gestation period for reforms to yield success, formal impact evaluation tools, such as randomized experiments, may not show success for many years. Consequently, a Collaborating, Learning, and Adapting (CLA) approach to process evaluation could be deployed in the interim.[2] This would permit iterative learning, adaptation, and, ultimately, improvement throughout the program cycle.

- Strengthen local institutions, organizations, and actors necessary for intervention success using tailored training modules for the program that are contextually appropriate and continue training throughout the program rather than as a one-off activity.

- Work through existing policy-making processes and institutions. Avoid creating "super institutions" outside of the existing government organizations. The case studies found that these extra-organizational institutions result in the marginalization of "existing structure and created discontent, fragmentation, and conflict within existing institutions."

- Improve coordination and communication between experts and government actors. Expert interviews revealed instances where despite robust cooperation and planning among stakeholders for sectoral interventions, poor communication undercut implementation efforts. USAID can mitigate these issues by ensuring that programs are developed, implemented, and monitored by, with, and through local partners.

- Consider legal barriers or weak legal implementation. Case study analysis indicates that in some instances, past donor programs have circumvented or ignored corruption during implementation. For example, countries may be a signatory to international law such as the United Nations Convention on Anti-Corruption or have local sectoral laws that include anti-corruption embedded within.

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[2] https://usaidlearninglab.org/cla/cla-toolkit/understanding-cla

ANNEX I: USAID LEARNING QUESTIONS

FRAMING QUESTION I	WHAT DOES USAID NEED TO KNOW TO ACCOUNT FOR POLITICAL-WILL DYNAMICS IN COUNTERING CORRUPTION?
Sub-Questions	• What is political will for anti-corruption reform? • How is political will assessed, to what degree, and at what level?
Sub-Questions	• How can threats and risks be assessed in the development and sustainability of political will? • How can political will for anti-corruption reform be better defined and unpacked to usefully inform program design, implementation, and evaluation?
Sub-Questions	• What factors explain the presence, absence, or degree of political will for a given anti-corruption reform? • Are there "tipping points" or triggers that explain when political will for Anti-Corruption reform emerges?

FRAMING QUESTION 2	HOW SHOULD USAID PROGRAMMING TO COMBAT CORRUPTION ACCOUNT FOR AND INFLUENCE POLITICAL WILL, PARTICULARLY WHERE IT IS WEAK?
Sub-Questions	• What strategies exist to increase or maintain political will or prolong the window of reform? • Should these vary because of country context, sector, administrative level, and type of corruption?
Sub-Questions	• What is effective/ineffective in environments of low political will, and what are the key factors to success? • What may be promising approaches to try? • When is it worth investing in anti-corruption efforts when political will is low? • Are there specific criteria that could be used in decision-making?
Sub-Questions	• How should this learning be incorporated into training, policy, strategy, assessment, design, implementation, and evaluation work?

SECTION I. ANALYTICAL PATHWAY AND RESEARCH DESIGN

Reformers complain that anti-corruption programming is often weakened by the low political will of politicians and elite bureaucrats, who block their initiatives outright, delay roll-outs, or undercut their influence by starving them of financing and creating competing and contradictory rules or institutions. Because political will is thought to be the basis of these choices, practitioners claim that anti-corruption reforms must first begin with efforts to directly alter the will of politicians.

With these concerns in mind, the USAID Democracy, Human Rights, and Governance - Learning, Evaluation, and Research (DRG-LER) II activity invited the Duke Center for International Development (DCID) to evaluate two questions as part of the DRG Center's Learning Agenda: 1) What does USAID need to know to account for political-will dynamics in countering corruption; and 2) How should USAID programming to counter corruption account for and influence political will, particularly, where it is weak? **Annex I** in the **Executive Summary** displays the full set of learning questions and sub-questions that directed our research program.

DCID's research to answer these questions involved three sequenced stages: literature review, evaluation of interventions, and in-depth case studies. Each of these stages is built on the lessons learned in the previous endeavor. To answer the first USAID DRG Center learning question, we engaged in an extensive literature review of the academic and practitioner literature on political will in anti-corruption efforts. After concluding that direct, high-level anti-corruption programming is inadvisable in low political-will settings and that an indirect, sectoral approach was likely to be more fruitful, we embarked on an intensive evaluation of ten well-known and highly praised interventions that we deemed complement a sectoral approach. From this evaluation, we concluded that four families of interventions stood the greatest chance of success.[3] This led us to select four case studies of applications of those intervention families in low political-will states (i.e., Mozambique, Vietnam, Ukraine, and Peru) to better understand how development practitioners worked with politicians and non-state actors to implement the reform while avoiding impediments. Together, the evaluation of interventions and case studies inform our answer to the second learning question of how to initiate, sustain, and scale up sectoral anti-corruption efforts. **Figure 1** displays our research trajectory.

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[3] We use the term families to group together related interventions that share similar theoretical logics but vary slightly in their implementation tactics and focus. For instance, the transparency family includes improving access to local budgets, delivering performance scorecards to citizens, and public posting of administrative fees for citizens.

Figure 1.   The Research Trajectory

Literature Review
- Reviewed three decades of academic and practitioner publications on political will and anti-corruption.

Evaluation of Interventions
- Scored ten lauded interventions to identify four that had the greatest compatibility with sectoral anti-corruption programming in low political-will settings.

Case Studies
- Performed case studies of the implementation of the four highest-ranked interventions.

LITERATURE REVIEW

In the first stage, we traced the usage, measurement, and applications of the concept of *political will* as it relates to anti-corruption activities over three decades, surveying thirty academic books and papers and twenty practitioner reports that are referred to as the "gray literature." We built a comprehensive library of documents and organized them into a database, coding documents by their source (academic, gray, journalistic), level of analysis (national, subnational, sectoral), and methodological approach (theoretical, quantitative, qualitative). The database also records each document's definition of political will, suggested indicators for measurement, the particular actor whose will most heavily influence anti-corruption efforts (central politicians, local politicians, bureaucrats, citizens, and non-state actors), and the research team's assessments of the strength of the evidence presented.[4]

Our conclusions are covered in more depth in Section II, while Annex III provides a chronology of the evolution of the term "political will" in anti-corruption research. We summarize the high-level findings here as they relate to the next steps in our research design.

The concept of political will and its application for understanding corrupt contexts is not new. It achieved prominence within the anti-corruption literature in the 1980s as an attempt to understand how corruption works and why some anti-corruption reforms succeeded, and others failed. With a focus on government leaders, governance, and anti-corruption writ large, the implied theory of change was that political will was a necessary condition; that is, political will must be present for anti-corruption reform projects to be successful.

These early writings on political will were impeded by a conceptualization that involved evaluating intent and motivation, which are inherently intangible phenomena. This core understanding made political will hard to assess accurately or objectively, and in research and use in the field, its presence (or absence) was prone to manipulation and misrepresentation. In light of these shortcomings, in the 2000s, many analysts determined that the concept of political will was not useful in developing anti-corruption strategies.

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[4] This full database can be downloaded in Annex II.

In the intervening years, while some researchers continued to focus on political elites and concept measurement, newer scholars recognized the need to radically expand the idea to improve its application to various cases. They argued that any discussion of political will must include and analyze institutional factors (formal and informal, micro and macro), broader structures, and patterns of corruption. They also asserted that political will should be applied not only to leaders and elites but to a broader group of stakeholders, including civil society, external actors (donors), and bureaucrats.

This more nuanced understanding of political will strongly supports addressing specific problems within sectors (e.g., education, extractives, health, and governance), where anti-corruption reforms may enter through "the side door." By focusing on demand-driven, sectoral needs and deeply engaging with contextual political and power dynamics, practitioners can develop programmatic approaches that tackle corruption in a way that is both technically and politically feasible.

EVALUATION OF INTERVENTIONS

After concluding that a sectoral (sometimes called a side-door) approach had the greatest chance of success in low political-will settings, we moved to the second stage of our research, which was the selection of interventions that could be most fruitfully paired with a sectoral approach. We began with a sweeping survey of anti-corruption reforms, but then narrowed our focus to specific families of interventions that the extant literature lauded as successful in reducing corruption. The team selected ten families of interventions that previous reviews of anti-corruption deemed to have the most comprehensive theoretical and empirical support while also representing a broad enough cross-section to address the types of corruption that exist in low political-will states (i.e., micro versus macro, collusive versus non-collusive).

INTENSIVE REVIEW OF ACADEMIC AND GRAY LITERATURE ON ANTI-CORRUPTION INTERVENTIONS

After selecting ten interventions for deeper analysis, we then identified 130 articles from the academic and practitioner literature that provided detailed studies of these interventions. We identified academic articles through keyword searches on academic databases, including *JSTOR, Proquest,* and *Google Scholar.* Gray literature was assembled through more targeted searches on the websites of multilateral development banks, bilateral development agencies, and the anti-corruption community of practices. Literature was supplemented through recommendations of individual scholars and expert practitioners. We explain the logic of these interventions in Section III, provide a database of all articles in Annex IV, and offer detailed summaries of the literature on these intervention families in Annex V.[5]

Figure 2 presents the number of articles that the research team identified for each of the surveyed intervention families. The gray bar shows the total number of studies that we reviewed. These included both quantitative and qualitative analyses, large-n cross-national work, single-country case studies, and broader think pieces. The light blue bar shows the number of articles that included a rigorous impact evaluation of the intervention. We defined rigor by whether or not the article compared a treatment group that received the intervention to a control group that did not, so an assessment could be made about whether the intervention reduced corruption in the treatment group relative to the counterfactual condition of no intervention in the control group. We did not limit ourselves to randomized experiments. Instead, we had a more expansive definition of the impact that included

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[5] The full database of articles consulted can be downloaded from Annex II.

natural experiments, observational work using causal inference tools, such as difference-in-differences analyses or regression discontinuity, and also qualitative case studies with clear comparison groups.

Figure 2.   Articles Identified for Review by Intervention Family
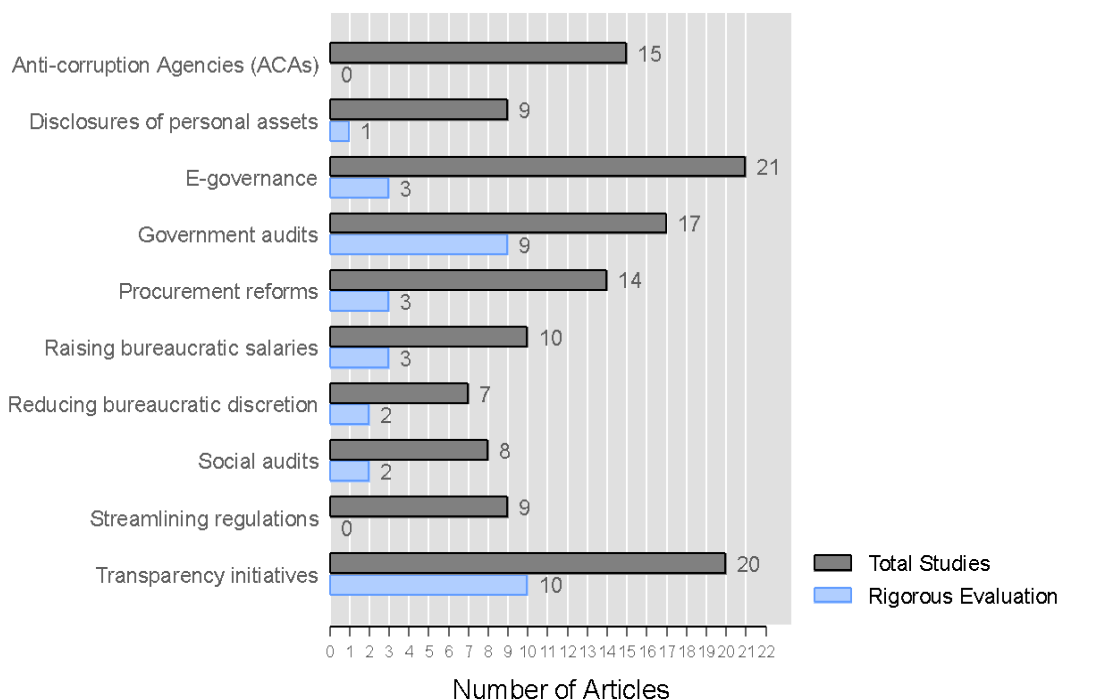
SYSTEMATIC SCORING OF POTENTIAL IN LOW POLITICAL-WILL SETTINGS

We then coded each article on four criteria, ranging from A, the highest score, to D, the lowest. While we were as rigorous a possible, this exercise was illustrative and necessitated subjective assessments by coders.

1) **Theoretical Logic:** Did the theory of change make sense when subjected to a political economy analysis of the powers and the constraints on the actors needed to implement it? Did the authors present a coherent story of how the intervention reduced the incentive or capacity of political actors to take bribes or kickbacks? Did it anticipate how these interventions could be protected from powerful actors who might want to reverse their efforts?
2) **Empirical Rigor:** Was there gold-standard empirical support, where the impact on actors subjected to the intervention was compared to a realistic counterfactual comparison of those who were not? And did the rigorous intervention show evidence of reduced corruption?
3) **Costs to Implement:** How expensive would it be to roll out, scale up, or sustain over time?
4) **Political Feasibility:** Did the intervention make sense in a low political-will context? Could it be used in a sectoral anti-corruption setting by being deployed to solve broader policy problems?

SELECTION OF INTERVENTIONS FOR DEEPER, QUALITATIVE ANALYSIS

After aggregating the scores for each paper to an average grade for each intervention, we identified the four highest-scoring intervention families, which we concluded had the best overall chance of success for reducing corruption in countries with entrenched elites and reticent political leaders:

1) **E-governance reforms**, where digital technology removes bureaucratic discretion over regulatory and administrative procedures and reduces the number of steps in which citizens and businesses may be subjected to bribe requests.
2) **Transparency initiatives**, where citizens are made aware of the specific elements and impacts of programs and policies, allowing them to protect themselves from bribe requests while also facilitating monitoring of the budgets and activities of local and national leaders.
3) Procurement reforms, which secure transparent and open access to public tenders, reducing opportunities for the capture of the process by connected and bribe-paying bidders.
4) **Social accountability efforts**, where non-state actors and civil society are deputized and given the tools to monitor and hold corrupt officials accountable through social audits and other watchdogs.

CASE STUDIES

The DCID team then selected four countries for deeper study. Within each case study, we explored lessons we can learn and apply in rolling out these interventions to different institutions and in a range of economic, political, and cultural contexts. In cases that were not successful, we explored what went wrong and how the intervention could have been more successfully implemented. Case research was conducted using a multi-method approach, employing a research design that included a review of gray, academic, and journalistic literature on the specific interventions in these countries; original data collection; and interviews to illuminate the learning questions more fully.

CASE SELECTION

We selected the specific countries to study based on four criteria. First, the cases needed to be in countries that the academic and gray literature identified as exemplars of one of these four interventions. Second, the countries needed to be considered low political-will states at the time that the intervention was initiated. We used Transparency International's Corruption Perception Index (CPI),[6] selecting countries that were in the lower third of the distribution at the time the intervention was started. While there are many national-level indicators of corruption, the TI-CPI is appropriate for this task, because its methodology incorporates survey data of households, domestic businesses, foreign investors, and outside experts, providing a useful benchmark of how multiple stakeholders feel about efforts to combat corruption in the target country. Third, to illuminate their role in enabling, supporting, or sustaining anti-corruption reforms, as well as any lessons learned in development programs, we looked for cases with a history of donor support. Fourth, we chose cases with existing research we could draw upon to understand the mechanisms and test the innovation's theory of change. This led to the selection of four countries shown in **Table 3** below.

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[6] https://www.transparency.org/en/cpi/2022

Table 3.   Case Selection Criteria

COUNTRY	VIETNAM	MOZAMBIQUE	UKRAINE	PERU
Intervention Family	E-Governance	Transparency	E-Procurement	Social Audits
Sectoral Policy Problem of Leadership	Barriers to private sector SME development	Deforestation caused by illegal logging	Inefficient paper-based procurement	Dissatisfaction with public service delivery
Key International Partners	USAID	United Nations and World Bank	USAID and Transparency International	Hewlett and Open Society Foundations
Initiation Year	2005	2009	2014	2016
Transparency International Rank at Initiation Year	107/158	130/180	142/174	101/176

To better understand how transparency initiatives could be successfully implemented in a low political-will context, we chose the implementation of REDD+ and a Draft Forest Law in Mozambique. These efforts to better inform citizens about deforestation and environmental sustainability led to a greater understanding of how corruption was undermining environmental protection efforts by creating loopholes for the exploitation of natural resources, illegal logging, and illicit timber exports to China. According to existing research, greater public awareness, facilitated by journalistic coverage, and the engagement of local and international partners generated momentum for greater efforts to curb corrupt activities as a means for stronger forest conservation efforts.

Multiple countries around the world have implemented social audit initiatives, but for further study, we selected Peru, where a local Citizen Brigade initiative was scaled up by Transparency International to become the comprehensive Proética Citizen Audits and Open Government Program. Proética was prominently involved in providing information from social audits to investigative journalists, who unveiled close government connections and payoffs from organized crime in several high-profile cases that received national and international scrutiny. The ensuing public outrage and formal investigation led to the formation of a high-level government consultative commission including representatives from Proética, which recommended ten concrete anti-corruption measures, including constitutional reforms.

We selected Vietnam to better understand e-governance efforts because of the ongoing government-implemented National Digital Transformation program, which aims to move at least 80 percent of public service applications and administrative procedures onto a national portal that will also be available on mobile devices. This e-governance program was strongly motivated by a long-standing USAID project called the Vietnam Provincial Competitiveness Index (PCI), which ranked Vietnam's 63 provinces on their investment environment. A critical finding documented in multiple annual PCI reports was the relationship between burdensome business regulations and bribe requests, known as informal charges. These conclusions, which were reported on in thousands of Vietnamese newspaper articles, highlighted the need for regulatory streamlining to achieve government goals of creating an internationally competitive domestic private sector.

We chose to study procurement through the lens of Ukraine's ProZorro, a digital procurement system built on the principle of total transparency. ProZorro consists of a public procurement web portal that consolidates all electronic tenders in a central database, supported by an auction module and portal, all managed by a state-owned enterprise and coordinated by the Ministry of Economic Development and Trade. Civil society groups can then monitor transactions through the Business Intelligence (BI) model, while the private sector supports operations of the online marketplace. International donors contributed to feasibility studies for the effort and funded the scaling of the system from a pilot to a national-level program. The program, however, was first conceived and developed by a group of citizens. This multi-stakeholder approach led to dramatic reductions in government spending, increases in the number of new vendors willing to compete for government contracts, and measurable increases in the value of procurement contracts on the site. Most importantly, reports of corruption declined from 54 percent to 26 percent in the year after ProZorro was launched. Although the ongoing war with Russia has waylaid many government activities, ProZorro continues to pay dividends by helping the identification of corruption in military procurement, which led to the resignation of the Minister of Defense.

CASE METHODOLOGY: PROCESS TRACING

The ultimate goal of each case study was to draw out generalizable lessons of how a successful sectoral anti-corruption effort could be successfully implemented. Our primary methodological approach to researching case studies is known in the social sciences as "process tracing." Process tracing is an analytic tool for drawing descriptive and causal inferences from diagnostic pieces of evidence – often understood as part of a temporal sequence of events or phenomena (Collier, 2011). While process tracing is sometimes used for hypothesis testing (Mahoney, 2012), we deployed the tools to better understand the process by which the specific anti-corruption interventions were introduced in each country, the timing and sequencing of their introduction, the actors who both assisted and inhibited reform effort, and, where possible, the outcomes of the efforts (Ricks & Liu, 2018). The specific research questions we asked in each case can be seen in **Box 1** below.

The DCID research team began each investigation by building foundational knowledge of the case, based on reviews of the gray, academic, and journalistic literature in each country. This information was used to assemble basic information about the scale and scope of the intervention, the key actors involved, the stakeholders who benefited from the reforms, and the timeline of key events. This information shaped the outlines of each case, but also helped the team develop case-specific interview protocols. Where possible, the team also collected administrative and survey data to measure the extent of progress on both the sector reforms (i.e., reductions in regulations) and reduced corruption.

Box 1. Questions Used for Process Tracing

1) What specific problem(s) was the reform/intervention(s) seeking to address? (For example, a political problem, a fiscal problem, donor leveraging, etc.)

2) Who initiated the reform/intervention, in what sector(s), and at what level? (Civil society, donors, ministries, politicians)

3) What was the political context (fragile state, post-war, etc.), the level of intervention (national, local, policy, etc.), the dominant type of corruption (petty, grand, etc.), and the mode/source of anti-corruption effort (punitive versus reformative, and governmental versus non-state actors)?

4) What factors accounted for the opening opportunity to address corruption or sectoral problems? Was there a strategy to either create, amplify, or sustain political will/opportunity?

5) Was there a "trigger" that explained when political will for the reform/intervention(s) emerged?

6) What role did donors play in creating an enabling environment for the reform/intervention, supporting the reform/intervention, and sustaining the reform/intervention?

7) What was the theory of change for the reform/intervention? What was the planned impact of the reform? Was there an intentional or unintentional anti-corruption impact and, if so, at what level?

8) What details in context assessment, intervention design, implementation, monitoring, or evaluation are notable in terms of either the impact of the reform/intervention or in creating, supporting, and sustaining political will for anti-corruption?

9) What has been the impact of the program?

10) What appears to be effective/ineffective as it relates to anti-corruption and political will? What appears to be the key factors to success or failure?

SEMI-STRUCTURED INTERVIEW SELECTION

After the research teams felt comfortable with their foundational case knowledge, they assembled lists of key informants for detailed, semi-structured interviews. We selected informants to provide additional information on local context, on the details of the initiatives, and the relevant information about their rollout and scaleup, as well as challenges faced. Selected interviewees varied across the cases based on available experts, and overall included: 1) Government officials involved in the reforms, 2) Academics and think tank experts, 3) Civil society representatives, 4) Multilateral or bilateral development agencies, 5) Business representatives, and 6) Journalists. It is important to note that these experts were not randomly sampled and do not represent the general population of citizens in the country or even those involved in the community. They were specifically targeted to shed light on the narrow intervention. After an initial round of interviews, the interview list was expanded through snowball sampling, where we asked additional interlocutors for other experts to whom we should talk. In addition, our sample includes some selection bias. Given the illegal and somewhat dangerous nature of these conversations, many potential respondents refused to talk, did not have time, or were unreachable.

Table 4 displays the number of informants interviewed in each country by their profession. Among each of these informants, we identified an anti-corruption champion, an advocate within the country who has played a critical role in combatting corruption in several arenas, and who was able to provide a bigger picture of how the intervention under investigation played into the larger effort.

Table 4.   Semi-Structured Interviews by Country and Type

COUNTRY	VIETNAM	MOZAMBIQUE	UKRAINE	PERU
1. Government officials	1	3	2	4
2. Academics and experts	4	2	2	1
3. Civil society	0	2	4	3
4. Multilateral or bilateral development agencies	2	1	2	1
5. Business representatives	2	0	0	2
6. Journalists	1	2	1	0
Champion	Ms. Pham Thanh Nga (Lawyer, Hanoi International Arbitration Center)	Luis Nhachote (Freelance investigative journalist)	Victor Nestulia (Director, Open Contracting Partnership)	Walter Alban Peralta (Former Minister of Interior, Directive Council of Proetica)

For a full list of interviewees, see Annex XII.

ANALYSIS OF INTERVIEW TRANSCRIPTS

For each interview, the research team devised semi-structured interviews that were tailored to the details of the intervention and case country context. Because we were following a process tracing methodology, our interview questions needed to be highly specific, so that we were able to pin down critical details in how the interventions were conceived, implemented, and maintained amidst pushback (Ricks & Liu, 2018). Semi-structured interviews allowed researchers to follow interesting leads, push for new information, and fill in missing pieces of the narratives that had been assembled from desk research. It also allowed for the identification of drivers that were unique to the success or failure of the interventions in specific countries.

These lines of inquiry were designed to encourage a practical discussion of the learning questions. For example, in interviewing local officials relating "triggers" for the emergence of political will, the interview was semi-structured, beginning with questions such as "We are thinking about political will as an opportunity to address a problem. Was this a concern for you, and what did you think about it? Did you do anything to further take advantage of this opportunity?" or "Did you have an overall strategy to influence political will to make the reform/intervention happen? How did you work around resistance to the reform?" In some cases, the interviews began with more structured questions and pre-determined topics and ended with more open-ended questions to help reveal unanticipated topics or themes.

The DCID researchers followed all consent protocols, including stating the purpose of the research and what is expected of the participant, and the amount of time likely to be required. Interviewees were

informed that participation was voluntary and that they could withdraw from the interview at any time with no negative repercussions. Interviewees were offered confidentiality and the option of speaking "off the record" where such protection was requested. Several respondents wished to remain anonymous, and the researcher described how confidentiality would be protected, along with the name and contact information of the researcher if they had questions about their rights as an interviewee. The respondents' identities cannot be matched to the interview content except by the interviewer.

Every interview was accompanied by an archival information sheet with the above information and a signed informed consent form (signed only by the interviewer if oral or by the participant and interviewer if written). Data from interview transcripts were systematically collected and stored in referenced formats to prepare them for text analysis.

Due to the non-random and small number of informants, and the targeted nature of the interviews, it was not possible to treat interview data as one would a close-ended structured survey. It would not make sense to look for measures of central tendency or variation across cases. However, each interview provided large transcripts that could be mined for textual patterns that could point the way to common lessons across cases.

To uncover these patterns, we used the *NVivo* software to organize and analyze the 42 interview transcripts displayed above.[7] NVivo is not an automated content analysis program that uncovers latent topics. It is a researcher-driven, qualitative tool that facilitates the coding of words or sentences into larger baskets and to further code these terms for sentiment. A researcher, for example, can conclude that a particular interviewer mentioned the role of domestic journalists in combatting anti-corruption more frequently than did international development agencies. Critically, DCID did not use *NVivo* to definitively isolate statistical patterns or causally identified conclusions. The goal was simply to identify some common patterns and divergent themes that arose across countries and that could be explored more deeply through a close reading of the transcripts and the triangulation of transcript quotes with externally collected quantitative and archival data.

Figure 3 displays a tree map that DCID researchers developed from the initial analysis of all 42 transcripts that was used to guide further investigation. A tree map is a simple diagram to display how many coding references are associated with a particular label. The size of each box displays the popularity of each term. The box sizes are scaled, so they should not be read as an absolute number, but rather as a relative number of citations. For instance, a box twice the size of another would indicate twice as many references. A particularly useful feature is the color coding of reference clusters that are hierarchical or nested, which allows researchers to understand the relationships between coding references and visualize them, adding up to a more fulsome picture.

Because our interviews were highly focused on interventions, they were specifically structured and then analyzed to explore implementation challenges and opportunities (yellow) and the political environment for anti-corruption reform (red). Within the cluster of implementation challenges, respondents highlighted difficulties posed by fragmentation across organizations and funding constraints. When discussing opportunities, they highlighted the role of civil society, private actors, funding opportunities, and bottom-up public support. As one might expect for a conversation about political will, in discussing the political environment, they tended to highlight the role of elite interests as a constraint, but also

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[7] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9014916/

how they could be re-shaped through better-aligned incentives. Political party competition and windows of opportunity caused by political transition also were mentioned.

ASSEMBLING DESK RESEARCH AND INTERVIEW ANALYSIS INTO NARRATIVES

The final step of our case study research was the assembly of the desk work and interviews into detailed narratives that tell the story of the four interventions. Each narrative provides explanations of 1) the country's political, economic, and corruption context that engendered programming; 2) the sectoral problem that motivated the reform; 3) the window of opportunity that allowed for the initial conception or roll-out of the intervention; and 4) a final commentary on the particular features of the environment that enabled success and the constraints that had to be overcome. These detailed process tracing narratives for the case studies can be found in Annexes VII-X. We provide a cross-case analysis that weaves together the common themes from the four case studies in Section IV. We conclude with generalizable lessons that can serve as a guide for anti-corruption programming in similar low political-will settings.

Figure 3.   Tree Map of Idea Clusters Generated from 42 Interview Transcripts
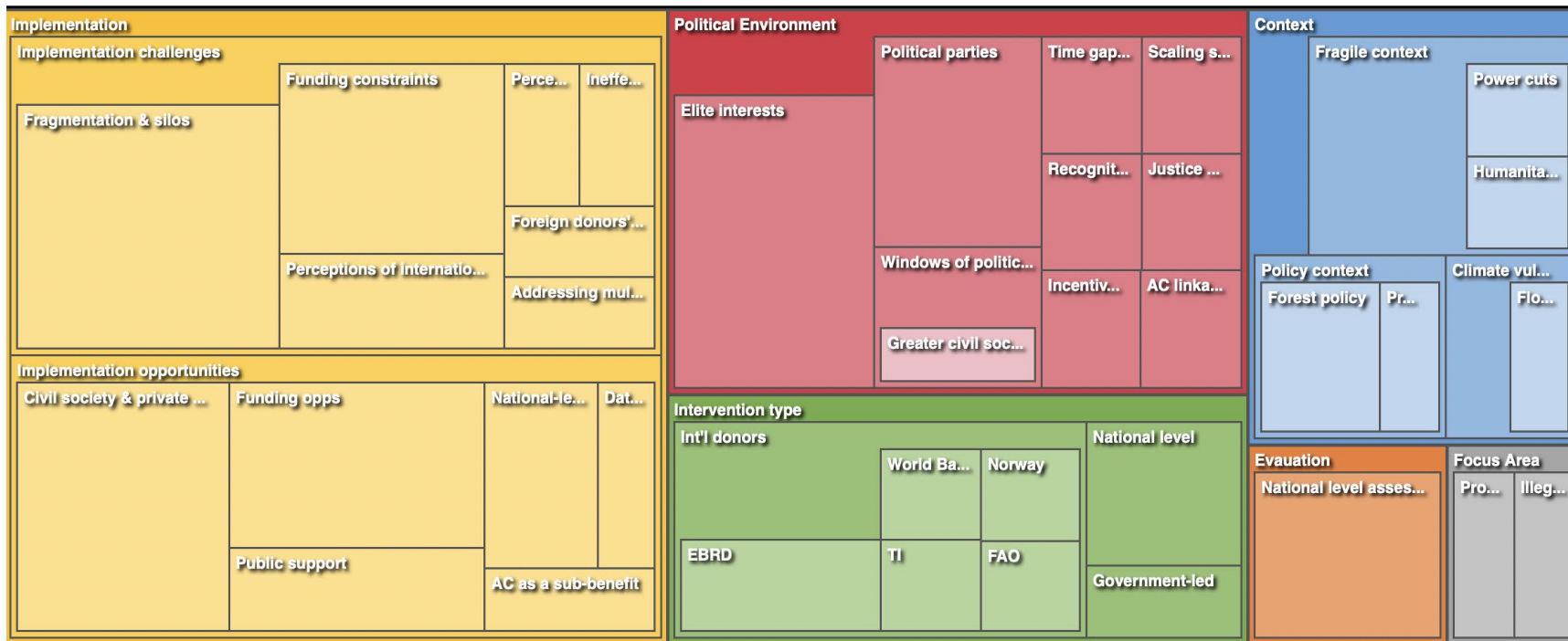
SECTION II. DEFINING POLITICAL WILL

Corruption, or "the abuse of entrusted power and influence for personal or political gain" (USAID, 2022), is prevalent worldwide and slow to change, despite efforts to reduce its incidence. Transparency International's Corruption Perceptions Index has found that corruption perception rates have remained unchanged in most countries for over a decade. Corruption can take hold among a variety of stakeholders, including elite and local politicians, bureaucrats, and agencies and corporations that carry out government activities. Their activities can range from petty bribery to expedite bureaucratic procedures or obtain government documents to grand corruption, such as accepting kickbacks on large-scale government procurement or payments to influence the passage or obstruction of legislation (Fisman & Golden, 2017; Ang, 2020).

Strategies to understand and affect the desire of elites and politicians, who often profit from corruption, are a subject of great interest among anti-corruption advocates, leading to an expansive literature on *political will* that we review in this section. These efforts aim to define and address the intentions of these actors to reduce corruption. Analysts have generally defined *political will* as the commitment of national or local leaders to undertake actions that reduce corruption in their jurisdictions and to sustain the costs of those actions over time (Roberts, 2017).

The term has, however, proven problematic and difficult to operationalize, and alternative strategies and concepts are necessary to better unpack the "black box" of political will and ensure clearer and more successful strategies for anti-corruption activities. Measuring and, in turn, altering the *will* of politicians to act head-on to deter or punish corruption is usually untenable, as revealed by prominent critiques in the literature on anti-corruption and political will (See, for example, Hammergren, 1998; Johnston, 2017; and others). In practice, elite politicians, whose income or power is dependent on corruption, will not be amenable to direct anti-corruption programming, especially programming that empowers other actors to punish them for their illicit activities. This section describes what we term the five logics of political incentives that entrench corruption practices and outlines salient critiques around the definition and application of the terminology of political will as a route to influence.

We find that, in sum, the term *political will* is problematic and not useful as the foundation for designing anti-corruption initiatives. We explore available definitions and informative critiques in this section and recommend an alternative ("sectoral") approach that aligns programming with broader policy goals that leaders want to achieve. A sectoral approach, we suggest, is more useful to undergird anti-corruption programming in settings where incentives for elites to tackle corruption are otherwise low.

THE FIVE LOGICS OF POLITICAL WILL

Beginning in the 1990s, *political will* emerged as a framework to address the constraints anti-corruption actors face when leaders are unreceptive to or actively thwart anti-corruption initiatives. Anti-corruption advocates and aid practitioners suggested their efforts were frustrated by the low *political will* of the politicians and elite bureaucrats with whom they needed to work (Brinkerhoff, 2010). Politicians can and often do blunt reform efforts through multiple avenues, such as blocking anti-corruption initiatives outright, slow-rolling implementation, or undermining their influence by depriving them of resources, muting their influence, or creating countervailing rules or institutions.

Because many practitioners have assumed that low political will has shaped these blockages and barriers to reform, anti-corruption advocates have claimed that solutions lie in efforts to directly alter the political will of leaders. We suggest, however, that such efforts can be misguided.

An important reason these efforts fail is that low political will is rarely an attitude or norm that can be easily altered through persuasion or argumentation. What is often characterized as low political will is usually the outward manifestation of underlying structural constraints that shape the incentives or tie the hands of the leader in question. We observe obstinance when a much more complex architecture of incentives and institutional constraints lies below the surface. Understanding the five most common underlying reasons for low political will is critical to diagnosing solutions. These include:

1. DIRECT PERSONAL BENEFIT FROM CORRUPTION

Politicians or bureaucrats, who benefit from corruption, may be simply unwilling to forego the income, power, or other pecuniary benefits that bribes and kickbacks provide (Fisman & Golden, 2017). Corrupt activities in this purest form often involve direct financial transfers from beneficiaries to gatekeepers, who profit from securing corrupt rents (Aidt, 2016). This type of corruption can be difficult to combat, as it lines the pockets of the powerful. Disruption of these activities is challenging without replacing the lost income or offering greater returns in another sphere. For example, the primary source of income for corrupt leaders in Somalia is the rents they generate from corruption (Chêne, 2012), rendering them unwilling to engage in serious conversations about reform.

2. ENTRENCHED INTERESTS AND POLITICAL POWER

A politician may owe their political power to their ability to distribute corrupt rents to other elite politicians. By sharing opportunities for enrichment with other elites, who might collude to challenge them, politicians can ensure continued political support to remain in office or advance favored initiatives. For example, in Angola, so-called "Christmas bonuses" were offered to select members of the political establishment as an annual payment in cash to maintain their political patronage and power (Amundsen, 2019). Such dynamics explain why power-sharing can breed corruption in post-conflict settings, for example. Leaders co-exist and avoid destabilizing counter-movements by sharing the illicit rents of office – knowledgeable of the ever-present threat that depriving their government partners of corruption opportunities could lead to the resumption of conflict. For example, a study of several post-conflict negotiated settlements between 1996-2010, including, among others, Bosnia, the Philippines, and Northern Ireland, found that power-sharing cabinets substantively increased corruption, particularly in settings with natural resource rents (see Haass & Ottmann, 2017).

3. STATE CAPTURE

A politician may be controlled (or "captured") by powerful economic actors, such as state-owned enterprises (SOEs), connected companies, or powerful oligarchs, who are resistant to anti-corruption reforms that challenge their profit or status and put pressure on the politician to thwart them. State capture commonly arises when a state's institutions are weak or veto points are low,[8] allowing economic actors to identify a single individual or group of individuals with disproportionate control over

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[8] In political science, the power of people and groups to prevent policy change is summarized through frameworks of veto points and veto players. Veto players are actors who can potentially exercise some sort of veto over a change in government policy. Veto points are the institutional opportunities that give these actors the ability to veto (Tsebelis 2002).

the levers of power. Using money and other means of influence, these actors directly shape major state decisions by pressuring the "captured politician," who becomes dependent on their resources to stay in power (e.g., through campaign donations) or to maximize their income (Ang, 2022). Through these individuals, connected economic actors can purchase private benefits such as procurement contracts, access to natural resources, and amenable laws and regulations to grow their interests. Such factors historically shaped the transition states of the former Soviet Union and Eastern Europe (Hellman, Jones, & Kauffman, 2000), where state captors were businesspeople who purchased influence over policymaking through kickbacks or promises of personal gain, using personal connections to individuals and political parties to pursue profits. State capture has also been a factor in more recent corruption cases, such as the Gupta scandal in South Africa (Judith, February 2020).

4. BUREAUCRATIC AGENCY (PRINCIPAL-AGENT PROBLEMS)

A leader may be sincerely interested in corruption but may face roadblocks from powerful subordinates who benefit from the status quo. This concept hews to the principal-agent theory in political science that sees corruption occurring as a result of conflicting priorities between an elite authority and those authorized to act for them within the bureaucracy, which is compounded by imperfect monitoring. Lower-level bureaucrats (agents) can abuse public office to secure private gains, and those in authority (principals) are unable to hold the agent accountable due to high monitoring costs and weak sanctioning power (see Groenendijk, 1997). These challenges often arise because of asymmetric information and/or power between different levels of bureaucracy (see Ortner & Chassing, 2018 and others). For example, in China, the principal-agent model has been used to explain how bureaucrats and low-level officials (agents) have diverged from the wishes of the government (the principal) through bribe-taking in infrastructure development projects. Central government leaders, who are unable to directly observe corruption behavior, learn too late that infrastructure spending has been distorted by bureaucrats' self-interests, with investment moving toward costly projects that feed corruption and away from investments that could generate higher social returns (Zheng & Xiao, 2020).

5. CAPACITY

Beyond the four factors that explain the incentives of leaders, it is often common for analysts in the political-will literature to confuse incentive and capacity (as Roberts 2017 explains). It is possible that in some states a leader may be interested in anti-corruption reform, but they may not have the financial resources, technical know-how, bandwidth, or political capital to combat more sophisticated actors who benefit from the status quo. Low capacity is a particularly pernicious issue in fragile or post-conflict states. (Ackerman 2008, Zaum and Cheng 2011).

The hardest logics of political will to overcome are those where additional actors (*other elites* or *entrenched interests*) are resistant to change and have the institutional power to constrain the behavior of top policymakers. *Pecuniary motivations* can potentially be overcome through salary enhancements that make up for lost income, but it is impossible to understand the amounts or time frame for the compensation. *Principal-agent* and *capacity problems* may appear to be the most amenable to change, as they can potentially be resolved with greater resources for monitoring or training in technical know-how on corruption detection or enforcement. However, these latter two logics are rarer and, when they do appear, are often merely the visible symptoms of the other logics. What appears to be capacity constraints may actually be an elite leader intentionally depriving government inspectors of resources or manpower. And what appears to be a principal-agent dilemma may, upon further inspection, be revealed

as an incentive structure for rent collection programmed into the bureaucracy by top politicians. For instance, when subordinates must pay amounts far greater than their potential salaries to land top positions, they are incentivized to use the rent extraction capabilities of their new offices to make up the difference (Rose-Ackerman, 1997; Kaufmann et al., 1998; Fforde, 2023).

In sum, an anti-corruption reform leader would need to personally avoid rent seeking, not owe loyalty to a rent seeker, be free from political capture, have the capability to overcome principal-agent problems, and possess the resources and capacity to steer new policies. Of course, diagnosing which of these five logics is at play when a state is characterized as having low political will is critical for understanding how to best target anti-corruption efforts. However, peering into the black box of a corrupt state can be challenging: the logics may interact, and even in the case of a precise diagnosis, the constraints may be too severe to permit change. We delve into these dilemmas further below.

A PROBLEMATIC TERM: DEFINITION AND CRITIQUES

While there is no consensus on the terminology of political will and definitions vary, the term can broadly be understood as **the commitment of leaders to undertake actions that reduce corruption** (Roberts, 2017). This definition builds on literature that defined the term more broadly within policy spheres. For example, Post, Raille, and Raille (2010) offered a prominent definition of the term to be applied across policy areas as "the extent of committed support among key decision-makers for a particular policy solution to a particular problem with 1) a sufficient set of decision-makers, 2) a common understanding of a particular problem on the formal agenda, 3) committed to supporting, 4) a commonly perceived, potentially effective policy solution" (p. 659).

Brinkerhoff and Nicholas (1999, p. 3) broadened the definition to include all societal actors, saying that the term referred to "the intent of societal actors to attack the manifestations and causes of corruption in an effort to reduce or eliminate them. It is the commitment of actors to undertake actions to achieve a set of objectives—in this case, anti-corruption policies and programs—and to sustain the costs of those actions over time." Others (Ankamah & Khoda, 2018, p. 11) have described political will as necessary but not sufficient for meaningful anti-corruption reform. Post et al. (2010) highlight the need for a "sufficient set" of decision-makers and common understanding among them and the importance of a critical mass of support; although, it is unclear what degree of support is ultimately sufficient for reform. Brinkerhoff and Nicholas' extension of critical actors to include wider societal actors beyond Post et al.'s focus on key decision-makers helps capture the wider ecosystem of actors that shape elite incentives and undergird reform.

However, the practical application of the term has invited substantial critique, particularly as it "involves intent and motivation, which are inherently intangible phenomena" (Brinkerhoff, 2010). Once called the "slipperiest concept in the policy lexicon" (Hammergren, 1998), much of the literature revolves around critiques of political will as an applicable concept. In some instances, it has remained a stubborn phrase used *ex-post* to describe programmatic failure and country development strategy miscalculations, as well as an *ex-ante* enabling condition for viable AC reforms.

> "A prime example of magical thinking is the notion of political will—a hardy perennial that crops up in just about every discussion of corruption control. Outcomes are shaped by many forces and circumstances; Will of any sort is a

> matter of intentions and dispositions and, as such, is fundamentally unknowable in anyone other than ourselves…. A final problem is that political will is usually thought of as originating at the top of the system. But even if an anti-corruption 'champion' produces positive results, what happens when she or he leaves the building?" (Johnston, 2017)

Johnston's critique helps underline how the five logics of low political will described above undermine attempts to directly influence political will for anti-corruption reform. Even when authorities may be champions for reform, they may be hemmed in by external constraints within the government based on entrenched interests, state capture, or conflicting activities of subordinates.

These critiques were expanded upon in the interviews DCID conducted with anti-corruption experts (see Annexes XIII), which included questions about the definition of political will and the distinction between high and low political-will contexts. Importantly, there was no consensus among experts about an appropriate definition of the concept. Interviewees criticized the term's lack of specificity and clarity. The first source of confusion was that political will is opaque about which factors inhibit action. One interlocutor reported that in his agency, "we don't use the term, as it tends to be a blunt, catch-all phrase." He went on to say that working in such environments is not usually fruitful, "low political will means active political won't!" (Interview, 8/23/2022). The second source of confusion is about which actors are included in the analysis. A different respondent pointed out that it is important to "understand whose political will we are talking about" (Interview, 8/15/2022).

To provide more precision, these and other interviewees suggested two solutions. First, rather than discussing political will for anti-corruption as a whole, practitioners would be better served by untangling the concept into discrete interventions and problem-solving within sectors. Second, they urged understanding the role(s) multiple actors play in creating opportunities for reform, including civil society. We elaborate on these suggestions more below.

APPLYING POLITICAL WILL IN PRACTICE: THREE CORE CHALLENGES

In light of our review of three decades of research alongside these expert consultations, we argue that the term political will is problematic and inappropriate as a foundation for development programming for three main reasons:

1. MEASUREMENT CONSTRAINTS AND AMBIGUITY

The concept is inherently difficult to measure, resulting in a "black-box" effect. Development practitioners have highlighted a lack of clarity regarding how to apply political will as a concept in practice, lamenting that they lack clarity around the following core questions: 1) What is political will and how does it work? 2) Where does it come from? 3) Is it individual or collective? And 4) Can it be built or supported? Common uses of the term can over-generalize and, in turn, obscure the specific reason for low political will (i.e., personal benefit versus capture by elite interests) and can conflate motivation with capacity. Such opacity prevents targeted interventions for change and dooms mistargeted interventions, such as capacity building, to failure.

2. AGENCY PROBLEMS

Usage of the term also places disproportionate agency on individual anti-corruption champions within the government. The literature indicates that more broad-based support and commitment are necessary to sustain reform efforts. Inflated views of the agency of individual actors in anti-corruption efforts can overlook the important role other actors can play in anti-corruption reform and the enabling environment for change. Actors that might be missed through a too-narrow framing of political will include community-based actors that, in certain settings, can help circumvent corrupt state actors, empower affected groups, and build trust and legitimacy for initiatives at a local level (Klein et al., 2021), as well as other politicians and bureaucrats who might undermine efforts of a single leader. For example, a high-profile case of corruption in Italy concerning the MOSE, a public infrastructure project aiming to prevent flooding in Venice whose failure led to deaths, involved a wide set of entrepreneurs, bureaucrats, and politicians, who all shaped the corrupt system. Greater recognition of these multiple actors and their motivations and behaviors is necessary to thwart such corruption (Laffont and Tirole, 1992; Chiappinello, 2019).

3. LOGIC PROBLEMS (TAUTOLOGY)

A final and significant barrier to the effective usage of the term political will to explain corruption is that the causal argument is tautological (constructed in a way it cannot be wrong or disproved). That is, when programs fail, analysts blame political will. When they succeed, they assume its presence. This is a foundational flaw when political will is conflated with the presence or absence of reform. Because attempts to measure how to improve low political will for reform are tautological, it can be impossible to isolate the will for reform from the existence of reform. When political will is relied on to frame corruption problems, this can distract from more specific framings that can identify opportunities for and barriers to reform.

AN ALTERNATIVE APPROACH: ALIGNING INCENTIVES WITH SECTORAL STRATEGIES

Even if a clear operationalization of the concept of political will were possible and diagnosis of its logical underpinning perfect, efforts to promote elite-level anti-corruption reforms in states characterized as having low political will can be misguided. They will likely fail because elites or those who have captured them have too much to gain from the current corrupt system. Instead, indirect approaches to reform that look at elites and other actors—including low-level bureaucrats, international actors, private companies, and civil society that play a role in building incentive structures around them—are critical.

Politicians and bureaucrats who rely on corruption for their income or power are often not receptive to direct anti-corruption programming. Programming that empowers judicial investigations or anti-corruption agencies that may sanction them is particularly threatening and, therefore, unlikely to receive traction among politically savvy operators who cannot be easily tricked. Politicians are likely to understand that even minor and low-level anti-corruption activities can threaten their pocketbooks or power, so instead of trying to directly persuade elite officials to engage in broad-scale anti-corruption reforms, anti-corruption can more realistically be achieved indirectly by aligning efforts with alternative policy objectives which the politician is motivated to act upon.

Important studies have highlighted the advantages of sectoral approaches that can align anti-corruption activities with the incentives leaders face to solve specific policy problems. Sectoral strategies (sometimes called "policy" approaches, "back door," or "side door" approaches) are programs that "target specific problems with a high development impact, and that are also feasible to implement because at least some of the powerful engaged in these activities are likely to support their implementation *in their interest*" (Khan et al, 2019, 3).Sectoral approaches can also be effective when they solve problems that leaders and the public particularly care about, such as poor service delivery. As Uberti (2020) has found, reducing anti-corruption in a general approach "across the board" can be misguided and more likely to fail. Instead, practitioners should "target their efforts to specific spaces (or 'sectors') where corruption is particularly damaging, and donor interventions are less constrained)" (p. 12-18). This requires interventions that are "both feasible and high impact" for the specific context and sector. The Sectoral, Focus, Reformulation, Approach (SFRA) resources at the *Curbing Corruption* website is a useful starting point for practitioners searching for innovative ideas that connect sectoral reform to anti-corruption.[9]

It is worth noting that sectoral and back/side door strategies are not perfect synonyms, and may have different meanings depending on the perspective of those using the term. From our perspective, a sectoral approach refers to working on non-corruption related policy issues, such as education, health, or the environment to tackle corruption indirectly. A back/side door approach implies aligning the policy incentives of critical political actors with anti-reform efforts. It is possible for development practitioners to work on sectoral reforms without aligning incentives with the leadership. At the same time, it is possible to work with a motivated local leader without focusing on targeted sectors. In our discussion below, however, we link them, because we believe that a sectoral approach that aligns with the motivations of the top leadership is most likely to succeed.

UNDP has found multiple advantages for a sector-based approach, arguing that it can help in the following ways: inform more concrete approaches to corruption problems, target specific sectors where development is lagging, and find entry points for reform even in highly corrupt settings. For example, UNDP deployed a sectoral approach to anti-corruption through its Anti-Corruption for Development Effectiveness (PACDE) program after finding that addressing service delivery concerns in the education, health, and water sectors was a useful way for achieving anti-corruption gains in multiple contexts, including Haiti, El Salvador, Moldova, Colombia, and Ghana (UNDP, 2013). These efforts have also stressed the importance of using individual and specific sectors as entry points and using cross-sectoral activities to scale anti-corruption efforts up (UNDP, 2011).

These outcomes are further underlined by this study's findings. In Vietnam and Ukraine, for example, e-governance and e-procurement were entry points to solve efficiency problems for bureaucrats that, in turn, helped streamline processes and increase their transparency. To achieve these important goals that politicians were interested in, they inevitably had to tackle corruption in the regulatory and procurement systems. We also identified similar opportunities for sectoral activities for transparency in the forest sector in Mozambique and social audits in Peru, which served as entry points to solve policy-makers' import problems first, followed by downstream efforts to address corruption in those sectors later.

Adoption of a sectoral approach must carefully consider the five logics of political will sketched-out above. Some constellations of actors and incentives are more conducive to sectoral strategies than

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[9] https://curbingcorruption.com/

others. The approach is least complicated when the key obstacle is the pecuniary interests (Logic 1) of the top leader, because it *"only"* requires the leader choosing to prioritize the selected policy objectives over personal gain. Of course, if a leader is unwilling to choose policy over personal benefit, a sectoral approach will fail, but learning the leader's priorities is reasonably clear-cut. Capacity limitations (Logic 5) are also straightforward, requiring practitioners to augment sectoral programs with additional resources and training. Bureaucratic impediments (Logic 4) are surmountable but can be slightly more challenging, because practitioners must simultaneously work on both policy design at the central level as well as implementation and evaluation in subordinate agencies and subnational governments.

The most problematic logics for a sectoral approach are entrenched interests (Logic 2) and state capture (Logic 3), because a leader can be individually motivated but still face constraints and opposition from other actors, who benefit from systemic corruption. In these two cases, along with a recalcitrant top leader from Logic 1, a window of opportunity for sectoral programming does not exist. Practitioners and reformers would be better served by laying the groundwork for reform in the event that a future shock (e.g. political, economic or international crisis) alters the incentives of top actors. Our case studies below demonstrate a range of programming options that can help accomplish these foundational goals. Primary research can document the relationship between sectoral problems and endemic corruption. This research can then be communicated to broader society by making objective data publicly available and supplementing these disclosures with facilitation workshops and training on how journalists, civil society actors, and local politicians can access and use the data in their work. Finally, practitioners can construct coalitions for future reform efforts by identifying local partners within government agencies, NGOs, business associations, and local governments who can help insert key findings into domestic policy debates. These efforts are unlikely to immediately break through entrenched interests of actors who benefit from corruption; however, they will facilitate and strengthen sectoral programming and incentive alignment in case a window of opportunity emerge.

IDENTIFYING AND SOLVING ELITE PROBLEMS: METHODOLOGIES TO SUPPORT A SECTORAL APPROACH

As the discussion above highlights, identifying obstacles to anti-corruption efforts demands an understanding of which of the five logics of political will are at play, which in turn necessitates analysis of the powers, motivations, and constraints of leaders, elite political actors, connected businesses, and bureaucrats. A successful sectoral approach further requires an alignment of incentives of the policy objectives and reform strategies with a leader's broader policy goals. To achieve these objectives a detailed political economy analysis is necessary to diagnose the institutions and organizations in which both corrupt politicians and reformers must operate.

The literature review uncovered several methodologies for reviewing the political economy of activities. These include applied political economy analysis, context assessment tools, and technical guidance notes that can help interpret the idea of political will to better inform politically feasible, technically sound interventions and strategies enabled through the efforts of a broad range of stakeholders.

The below discussion highlights a number of tools and frameworks which offer useful methodologies and ideas for working in low political-will contexts. While some of these tools are not new, what is novel is understanding how to use these tools within sectors in highly corrupt (low-will) contexts and including them as part of a local approach throughout the program cycle.

1. THE CORRUPTION FUNCTIONALITY FRAMEWORK

The Corruption Functionality Framework offers a four-step process to identify corruption's social, structural, economic, and political roots, particularly in resource-scarce environments. The Corruption Functionality Framework has been used to help understand the underlying reasons for engaging in bribery, the real problems people are grappling with, and why they turn to corruption as a solution (Marquette, 2018). It has been applied, for example, to understand the root causes of bribery in health services in Uganda, identifying how bribery supplements very low waves in the health sector and how, without addressing these wages, anti-corruption interventions are not likely to work (Marquette & Peiffer, 2021). The four-step framework explores the rationale and the aim of reforms, followed by a short set of questions to guide thinking and discussion. The theory of change inherent in the framework is that alternative, more resilient solutions can be found and that patterns of behavior can be truly disrupted rather than simply displaced for a time. Understanding these patterns, programs can be designed that provide real solutions to problems in ways that other anti-corruption programs might not (Marquette, 2022).

2. DEVELOPMENTAL LEADERSHIP PROGRAM – BLACK BOX OF POLITICAL WILL FRAMEWORK AND TOOL

Researchers from the Developmental Leadership Program at the University of Birmingham have created a tool that aims to unpack the "black box" of political will by assessing policy context. It provides a conceptual framework driving an analytical process, shown in Figure 4, that aims to inform politically feasible interventions.

"Evidence suggests that external actors and their partners should have access to the best knowledge they can generate or access about local political dynamics. Being politically smart means having an in-depth understanding of the country, the problem, and the sector context, including embedded structures, history, and local institutions (both formal and informal, including norms, values and ideas), relationships and actors."

Developmental Leadership Program, 2018, p. 3

In this framework, a reform effort (blue circle) is examined by way of first identifying the political dynamics on the ground (orange context questions). If the reform can align with those political realities, then a sustainable, successful, and effective output can result (upper white circle). The converse results if the reform fails (lower white circle). Though this framework changes the evaluation of political will from a "yes/no" or "high/low" exercise to an analysis of whose political will and what for, political will continues to be part of the analysis, either as an enabling or a hindering factor for the particular reforms being tested (blue arrows). This level of contextual analysis can help planners anticipate and assess many dimensions of risk, including the risk of failure and risks from unintended harm. When reforms fail, the approach allows for better evaluation by addressing the locus of decision-making and reevaluation of motives and capacity. Finally, this methodology highlights the type of deeper contextual analysis that can help surface how the motivations of stakeholders can be leveraged to develop political will.

Figure 4.   The Black Box Effect
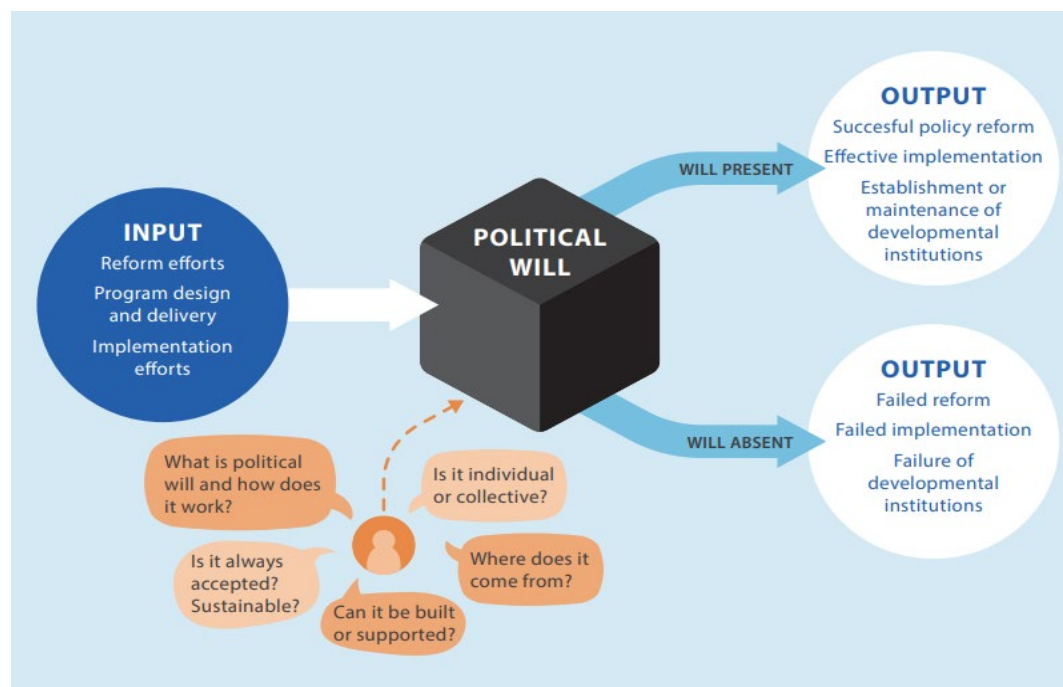
From Hudson, David, C Mcloughlin, C Roche, H Marquette. (2018). "Inside the Black Box of Political Will: Ten Years of Findings from the Developmental Leadership Program."

3. THE POLITICAL-WILL EQUATION FRAMEWORK

The Political-Will Equation Framework, based on Malena's (2009) "Getting from Political Won't to Political Will," presents political will as an equation: political will = political want + political can + political must, as described below. The idea is that, by breaking down these constructs, it is possible to identify entry points for reform.

- *"Political want"* refers to desired outcomes. This can be applied when power holders want to do things that benefit citizens because they are incentivized for reasons of preserving their power, for example, to do so.

- *"Political can"* addresses capacity. Before acting, power holders need to be confident in their own and others' abilities, skills, mechanisms, resources, and support. Capacity includes the capacity of civil society, the private sector, and other relevant state actors.

- *"Political must"* implies that desired outcomes and capacity must be accompanied by a compelling force or pressure that demands action and renders inaction politically costly. Pressure can come from above, for example, through mandates from higher-level authorities, or from below, such as from citizens through election or protest (Marquette, 2022).

The underlying theory of change is that power holders do not need to be forced to reform if reforms align with their political and personal self-interest (Marquette, 2022). This is consistent with the sectoral approach we describe above.

4. THINKING AND WORKING POLITICALLY (TWP) AS A METHOD FOR EXPLORING POLITICAL WILL

A final approach that is generally useful and can be applied variously through different tools and strategies is TWP. This approach, which developed from a community of practice building on political economy analysis (PEA) approaches, can inform efforts to unpack political will through its focus on acquiring deep and detailed knowledge of and long-term exposure to the relevant country or issues. The approach encourages a review of the detailed inner politics of regimes, sectors, problems, and "micro-politics" within a given context, calling for surfacing stakeholders and understanding their motivations. The TWP approach has three core principles: 1) *Analysis* – strong political analysis, insight, and understanding; 2) *Context* – detailed appreciation of and response to the local context; and 3) *Design* – flexibility, and adaptability, in program design and implementation. It encourages deep political economy analysis not only of the actors one seeks to influence but also of a development actor's own context and agency. It also emphasizes localization—appreciation for local contexts, local solutions, and local causes. Because TWP stresses a strong understanding of local political context across different levels of program analysis and design, it offers a useful framework for identifying the motivations of actors that is so critical for realistic and effective anti-corruption programming. We recommend an adaptation of this approach that focuses specifically on the motivations, powers, and constraints of actors undergirding the five logics of low political will. For instance, how does the executive share power with other elite political actors? What avenues are available for vested interests to interfere and capture the policy making process? And how much authority does the executive have over policy implementation by subordinate bureaucrats, especially at the subnational level?

Box 2.   Example of a Resource Drawing on TWP/PEA Approaches

USAID's Dekleptification Guide is one example of how to deploy relevant methodologies that draw on TWP/PEA approaches for anti-corruption programming. The guide draws on USAID's Thinking and Working Politically through applied political economy analysis methodologies, which stress an analytical approach to unpacking political, social, and cultural context by exploring foundational influences (such as history or geography), immediate events and actors (such as leadership changes or natural disasters), and institutional factors (such as laws and customs). The Dekleptification Guide's theory of change suggests that rolling back entrenched kleptocratic structures, networks, and norms is only possible during moments of opportunity which impact the political will of leaders, typically demanded by major segments of society. It is built upon the premise that political will for anti-corruption can be high when a political context becomes hotly contested and traditional corruption practices are threatened. These situations may call for rapid action. The guide stresses the importance of building upon, supporting, and sustaining political will around these moments of opportunity. When political will is low, and there is no discernable window of opportunity for anti-corruption reform, the Dekleptification Guide suggests conducting rich political economy analysis (utilizing methodologies such as those outlined in this section) —mapping corrupt activity, kleptocratic networks, reform coalitions, and policy priorities—laying the groundwork for future openings for engagement. The resource guides activities whether before, during, or after periods of opportunity for anti-corruption activities, with a focus on strategic sequencing, timely information, adaptive leadership, broad coalitions, proactive communications, coordinated diplomacy, international conditionality, flexible programming, and mid-course corrections.

THE BOTTOM LINE

Political will is an opaque term that conflates multiple structural logics for why top leaders fail to act to restrain corruption and is nearly impossible to directly measure. Even if perfect diagnosis and measurement were possible, however, a program premised on altering the political will of a top leader is

unlikely to succeed. It is rarely true that leaders simply lack the motivation for reforms, as they either benefit from the status quo or are hemmed in by other elites who do.

Operating through sectoral approaches that can mutually support clear policy objectives of leaders along with targeted anti-corruption goals is an optimal route for maximizing the potential for reforms to be sustainable and impactful. Ensuring anti-corruption activities focus on solving problems for elites can ensure that reform efforts have traction to last.

Once a specific sectoral strategy is selected, practitioners must then choose the tactics for achieving the sectoral goals, particularly the interventions that can be best employed to identify and constrain corrupt activities. These tactics, and a detailed analysis of how they are deployed in four selected country case settings, are discussed in the sections that follow. The Thinking and Working Politically (TWP) approach is particularly valuable for anti-corruption efforts because it offers a process to identify key decision-makers and maps their formal and informal powers to their political motivations.

SECTION III. EVALUATION OF EXISTING ANTI-CORRUPTION INTERVENTION IN LOW POLITICAL WILL SETTINGS

This section answers the second learning question, "How should USAID programming to combat corruption account for and influence political will, particularly where it is weak?" This question was further divided into two sub-questions: 1) "What has been shown to be effective/ineffective in environments of low political will, and what are the key factors to success?" and 2) What may be promising approaches to try?

WHICH INTERVENTIONS HAVE BEEN SUCCESSFUL IN LOW POLITICAL-WILL SETTINGS?

The literature review in Section II revealed that formulating definitions of political will writ large and identifying quantifiable indicators has proven to be difficult. The most recent research suggests that political economy analysis of actors and the institutions in which they operate can shed light on the incentives and goals of decision-makers. This knowledge can in turn assist anti-corruption reformers in bundling together anti-corruption measures within larger policy reform programs that are targeted at specific sectors of interest to top leaders. Thus, in the most recent literature, political will is not viewed as a hindrance that must be overcome but as a potential supporting factor if motivations and programming can be aligned. In this context, external pressure, from above or below, can also be effective.

Even so, where political will is low, programming can remain challenging and critical questions remain. Which programs best align with sectoral strategies? Which interventions are best able to reduce the incentives of gatekeepers to extract bribes and kickbacks? Which programs are the least likely to be reversed or waylaid by savvy actors who see them as a threat? To answer these questions, this section presents a collection of ten intervention families that have been implemented in locations that experts describe as high corruption and, therefore, low political-will contexts.[10] As we described in Section I, our conclusions were drawn from evaluations of 130 academic and practitioner articles about these intervention families. We provide a database of all evaluated articles in Annex IV and offer detailed summaries of the literature on these intervention families in Annex V. The high-level conclusions from our evaluation are summarized below.

We began with a sweeping survey of anti-corruption reforms but then narrowed our focus to specific families of interventions that the extant literature lauded as successful in reducing corruption. From there, we chose ten families of interventions to link with key themes emerging from the literature review regarding the challenges and opportunities for anti-corruption programming, seeking to explore evidence from promising practices. First, we chose interventions that were described as successful in reducing corruption across a range of actors and government levels, not just national ones. Second, interventions were selected that had been implemented or piloted in multiple contexts where political will was low. Third, we chose only those policies that have received sufficient analysis and coverage in the literature and were expansive enough to address the broad types of corruption that exist in low political-will states (i.e., micro versus macro, collusive versus non-collusive).

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[10] We use the term families to group together related interventions that share similar theoretical logics but vary slightly in their implementation tactics and focus. For instance, the transparency family includes improving access to local budgets, delivering performance scorecards to citizens, and public posting of administrative fees for citizens.

INTERVENTION ANALYSIS AND RANKING

The DCID Team coded each article on four criteria, ranging from A, the highest score, to D, the lowest.

We first assessed the coherency of the theoretical logic behind each intervention family, unpacking the "black box" of each intervention. After determining which stakeholder or power holders would be targeted, we assessed how the policy or reform aimed to change their behavior. In other words, we examined how and if there would be alignment between the needs of the power holder, the problem being addressed, and whether there would be reductions in corruption. We then applied a political economy approach to ask whether the policy made sense. Would actors in that political context behave in ways predicted by the theory of change?

Second, we analyzed the quantity and quality of the empirical evidence in favor or against an intervention. The best studies utilized a strong research design, whereby those that received interventions were compared against a counterfactual, which helps cancel any mitigating characteristics that might impede measurement (Morgan & Winship, 2015; Angrist & Pischke, 2015). Examples of a strong design are several studies of the Brazilian municipal audit system, comparing corruption in municipalities randomly selected to receive a pre-election audit to all other non-selected municipalities (Ferraz & Finan, 2011; Avis et al., 2018). These types of designs give the best empirical estimates of the effects of interventions on corruption levels. In our review, only 33 of the 130 articles had a clear impact evaluation included in the write-up.

Third, we considered the costs of implementation, including initial costs, sustainability, and the need for human support on the ground. We imputed our best estimates of resource and labor needs at each stage of the roll-out.

Finally, we assessed the feasibility of the intervention in contexts considered low political will. Although we do consider the feasibility of government-wide intervention, in line with our recommendations regarding political will above, our analysis centers on the applicability of interventions in sector-level approaches.

After scoring all the papers, we then aggregated scores into a letter grade for each intervention family on each of the four criteria, with a final letter grade summing up the overall score, with equal weight given to the four sub-scores. These assessments were necessarily somewhat subjective and impressionistic based on our reading of the bulk of evidence in the literature. We did not use formal results from a statistical meta-analysis. This was not possible due to the widely different contexts, measurements, and methodologies used in the extant literature. However, in Annex V, we provide a more thorough discussion of the findings of the literature and the analysis undergirding our coding decisions. Despite the promise and generally favorable reputations of these approaches, upon closer analysis, not all were deemed suitable for application in low political-will contexts. Four of the ten chosen were selected for further evaluation based on their overall higher rates of success:

1) E-governance reforms
2) Transparency initiatives
3) Procurement reforms
4) Social audits

SHARED FEATURES OF ALL INTERVENTIONS

Before delving into the detailed scoring, we discuss a few common threads that emerged across the ten analyzed intervention families.

First, most of the intervention families sought to target petty corruption by low-level officials and service providers in everyday, small-scale transactions. Only a few, such as procurement reforms, anti-corruption agencies (ACAs), and financial disclosures target grand corruption by higher-level officials or politicians.

Second, most of these interventions were designed, in some manner, to be implemented by both power holders in government and outside reformers. This design is in keeping with the findings of the literature review of political will and the inclusion of multiple types of actors. For example, at one extreme, ACAs require the support of top-level politicians, who must avoid interference and allow state law enforcement agencies to carry out enforcement and sentencing. At the same time, however, ACAs require legal and forensic technical expertise from outside experts. Alternatively, some efforts, such as social audits, may start as grassroots advocacy efforts rooted in a specific sectoral problem. However, even grassroots investigations and publicity campaigns require government awareness and permission to operate effectively.

Third, most interventions are based on the theoretical logic that public constituencies represent a powerful audience for increasing political will and pushing reforms through. Electoral sanctions are commonly referenced in theories of change, where information on corrupt officials is thought to push voters away from incumbents in the next election. Even if interventions do not directly mobilize citizens or civil society, their involvement becomes necessary at some point in the anti-corruption cycle. This requirement raises important questions for more authoritarian contexts, where political participation is limited.

Finally, a large number of intervention families have not been analyzed with substantial empirical rigor. It is possible that narratives of their success may rest upon atypical cases. We recommend more effort to engage in rigorous impact evaluations of theoretically promising but untested initiatives, such as asset disclosure and regulatory streamlining.

EVALUATION OF INDIVIDUAL INTERVENTION FAMILIES

In this sub-section, we summarize each of the ten investigated intervention families, explaining their theoretical logic, extant evidence of their success, as well as their projected implementation costs and feasibility, particularly their alignment with a sectoral approach. More detailed evaluations can be found in Annex V. For ease of interpretation, we summarize our final evaluation in a scorecard presented in Table 5 (below). These grades are impressionistic summaries of the cumulative weight of the evidence from all of the studied papers. Given the disparate methodologies, research approaches, and limited impact evaluations considered, a formal meta-analysis was not possible.

1. SUPPORT INDEPENDENT ANTI-CORRUPTION AUTHORITIES (ACA)

Independent anti-corruption authorities (ACAs), which have been well-documented in South Korea and Indonesia, centralize both the resources and capabilities necessary for broad anti-corruption campaigns, investing power in one agency that can then take independent actions against corruption. These ACAs have long been proposed as the best solution to the problem of endemic corruption and are "often

regarded by governments, donors, and international governmental organizations (IGOs) as the ultimate institutional response to corruption" (de Sousa, 2009, p1). ACAs have a strong theoretical logic, designed to operate as an elite agency shielded from pre-existing norms and cultures of corruption. No high-quality quantitative analyses comparing ACAs currently exist, but the preponderance of qualitative evidence shows that the success of ACAs is largely dependent on the resources and powers they are granted by legislative or executive authorities. ACAs require not only substantial resources to operate, but also only succeed when granted wide-ranging autonomy and long-term commitments. Furthermore, ACAs, focused as they are on eliminating corruption within the entire governmental structure, are largely not feasible in environments lacking high-level support for anti-corruption efforts. Additionally, the high level of resources needed to sustain an ACA makes it unsuitable for smaller, sector-level approaches.

2. SUPPORT REGULARIZED GOVERNMENT AUDITS

Regularized government audit procedures, conducted by specialized agencies both within and outside government, decrease corruption by increasing the probability of detection, allowing for either the removal of corrupt officials or the deterrence of future corrupt behaviors. The use of specialized audits has strong empirical evidence across different contexts. Like ACAs, audit agencies rely on independence from political interference, making them somewhat costly to implement, and they need the threat of sanctions for the audits to translate into reductions in corruption. Encouraging the establishment of widespread audits may not be feasible in hostile political environments, but there are opportunities to establish audits and reduce corruption in certain sectors, such as healthcare or education, especially when there is coordination from civil society and supportive actors within government. These sector-level audits often focus on corruption in service delivery and may be implemented by national anti-corruption authorities, as in the case of the Moroccan Central Authority for Corruption Prevention (ICPC), which effectively undertook an extensive audit of the health sector in 2011 to reduce misuse of public funds (Hussmann, 2020).

3. RAISE BUREAUCRATIC SALARIES

Using a logic of external rewards, this approach assumes that some politicians and civil servants turn to corruption in response to low income and that raising salaries should lead to reductions in bribe-taking. Empirical evidence remains quite mixed, with many studies showing no relationship between bureaucratic wages and corruption levels. In practice, if there is uncertain evidence of this dynamic, the costs of implementation, notably the need for greater government revenue to pay for these increases, may outweigh the benefits in a particular context. In other contexts, while raising bureaucratic salaries across the board may not be feasible politically, pockets of reform can be found, especially in sectors such as health care or education, where raising the salaries of teachers, for example, can be justified along other grounds, such as attracting better talent, while providing fewer incentives for those teachers to then engage in bribe-taking or corrupt side ventures.

4. PROMOTE THE RIGHT TO INFORMATION (TRANSPARENCY INITIATIVES)

Promoting access to information, whether through journalism, transparency initiatives, or right-to-information (RTI) laws, such as freedom of information acts, is central to many theories of change to reduce corruption, acting as a necessary condition for other interventions. Empirical evidence, particularly around specific initiatives and legal reforms, shows strong support for these efforts, indicating that they help put public pressure on officials to change their behavior. Additionally, some

initiatives are more cost-effective than others, especially those implemented by pre-existing civil society organizations. Finally, these initiatives are often utilized in micro-targeted interventions, targeting specific programs and involving primarily non-governmental actors. This intervention may be one of the most amenable to a sectoral approach to political will and anti-corruption efforts. For example, to reduce bribe-taking by bureaucrats involved in business licensing, a right-to-information approach would involve posting the prices of government services in that office.

5. IMPROVE FINANCIAL DISCLOSURES

Disclosure systems can be improved by utilizing new digital technologies, as well as tasking specific agencies within the government to uphold mandates on disclosure and flag potential conflicts of interest. While improving financial disclosures is often cited as a potent weapon against corruption, the theoretical logic behind these assertions remains underdeveloped, and debates around the ideal level of disclosure (balancing privacy versus anti-corruption efforts) make interpreting the evidence difficult. Costs of implementation, while decreasing in the era of e-filing, remain somewhat high and vary with the level of scrutiny imposed on officials, rendering some disclosure regimes very cost-intensive compared to others. Disclosure regimes remain hotly debated due to privacy concerns, so feasibility will differ across cultural and political contexts. In many high-corruption contexts, effective disclosure policies can be achieved in the long run despite political opposition, due to miscalculations from corrupt government actors regarding the real effectiveness of disclosure. However, this long-term approach may not be amenable to a sector-level approach, where the costs involved may be too high on a smaller scale. The resources available may not be sufficient to sustain a financial disclosure regime compared to the number of officials included in sector-by-sector programming.

6. PROCUREMENT PROCESSES REFORM

Centralized procurement process reforms, including e-procurement reforms, reduce interactions and allow contractors and citizens to see and interact with every step of the process. Public scrutiny and transparency give contractors and other public actors opportunities to challenge corrupt practices and limit opportunities for bureaucrats engaging in corruption, and centralizing the process removes the direct transaction from their power. Empirical evidence primarily rests on case studies of several success stories; however, more rigorous large-n quantitative studies generally show support for the underlying theoretical logic. Centralized procurement systems may be costly in the short run, but successes have shown that implementation costs are more than paid back by the reductions in losses to graft over the long run. As with disclosure systems, the adoption of centralized e-procurement methods does depend somewhat on support from political actors, but they can be used in different sectors or offices within government ahead of the whole system. E-procurement databases in the health sector, for example, can be utilized to compare prices across different vendors, with software flagging potential instances of price-gouging or potential kickbacks.

7. IMPROVE SOCIAL ACCOUNTABILITY (SOCIAL AUDITS)

Social accountability interventions operate through a bottom-up theory of change, aiming at providing guidance and resources to grassroots organizations to support their efforts to fight corruption. Empowered citizens and civil society organizations are better able to observe the actions of public officials and demand changes when necessary. While the empirical support for these interventions may be weaker than that for top-down audits, a remarkable amount of evidence demonstrates that 1) social

accountability interventions can be successful and 2) that they can operate outside of government channels. These interventions, such as the social audits carried out in India, remain relatively low-cost and sustainable over the long term. These interventions are feasible both where support from established political officials remains lacking and where the intervention is narrowly targeted to a particular sector. Community monitoring of healthcare provision in Uganda by villagers, for example, ultimately improved health outcomes and reduced corruption (Björkman & Svensson, 2009; Björkman-Nyqvist et al., 2014).

8. E-GOVERNANCE ADOPTION

E-governance is a set of reforms designed to move administrative procedures online, thereby eliminating the need to travel to a physical location and interact with bureaucrats in person. E-governance reforms decrease corruption by combining a number of the theoretical mechanisms of other intervention families in this list: 1) reducing the number of required interactions between bribe-seeking bureaucrats and citizens, 2) speeding up decision-making over approval processes, 3) reducing bureaucratic discretion, and 4) making the process more transparent. Empirical support for e-governance reforms is quite rigorous and comes from a blend of cross-national studies, individual success stories, and robust quantitative analyses. Costs for implementation may be high in the short run, indicating a place for strong donor support; however, when paired with strong buy-in from key civil society groups, e-governance reforms are remarkably feasible, even when targeted at a single sector, such as specific administrative procedures. E-governance reforms more narrowly targeted at property registration and business licensing have seen great success across several Indian states (Pathak & Prasad, 2006).

9. STREAMLINE REGULATIONS

Many anti-corruption interventions have emphasized the observable correlation between high levels of regulations and high levels of corruption, arguing that bureaucrats utilize the complexity of a regulatory regime to mask bribe-taking, sometimes referred to as "the tyranny of red tape." The theory behind streamlining regulations is that reducing the number of interactions between citizens and civil servants reduces the overall opportunity for bribery. However, while evidence supports that the number of regulations contributes to overall corruption, the research also shows that, in practice, more stringent interventions may be required to truly reduce corruption. Implementation costs can be somewhat high, especially if the intervention is explicitly designed to cut off corruption income from bureaucrats charged with implementing the new policy. While the implementation of these measures along a sectoral-level approach, such as the introduction of one-stop shops, has occurred in many high-corruption contexts, issues still arise around the viability of certain public services and eventual co-optation back into those same corruption networks.

10. REDUCE BUREAUCRATIC DISCRETION

Discretion is often regarded as a common factor in many corrupt exchanges, and though these programs are generally not feasible for government-wide applications (the costs of design and implementation are numerous, and the potential for damaging government function is high), they can be considered in more micro-targeted sectoral interventions. For example, in addition to improving transparency, publishing prices for basic government services (on public signage or online) in a licensing office removes bureaucratic discretion to set the price for a particular service, limiting options for bribe-

taking. The logic behind this intervention remains underdeveloped, and rigorous empirical evidence in favor of this policy is limited.

Table 5.   Report Card: 10 Common Anti-Corruption Interventions

Intervention	# of Academic Studies	# with Rigorous Evaluation	Theoretical Logic	Empirical Rigor	Costs to Implement	Political Feasibility	Overall Score
Social Audits	8	2	A-	B+	A-	A	A-
Transparency Initiatives	20	10	B+	A-	A-	A	A-
Procurement Reforms	14	3	B+	B	B+	B+	B+
E-Governance	21	3	B+	B+	B+	B	B+
Government Audits	17	9	A	A	C+	B-	B+
Disclosures of Personal Assets	9	1	B	B-	B-	B	B-
Raising Bureaucratic Salaries	10	3	B-	B-	C+	B-	B-
Streamlining Regulations	9	0	B	B-	B-	C+	B-
Reducing Bureaucratic Discretion	7	2	C	B-	B-	B+	B-
Anti-Corruption Agencies (ACAs)	15	0	A	B+	D	C	B-

This table was prepared based on a review of hundreds of academic papers and practitioner reports. The first column represents the number of refereed academic papers on the intervention. The second column provides the number of refereed academic articles that had a rigorous impact evaluation, where the study was compared against a reliable counterfactual. Columns 3-6 depict grades for the four major criteria: 3) Theoretical Logic: Did the theory of change make sense when subjected to a political economy analysis of the powers and the constraints on the actors needed to implement it? 4) Empirical Rigor: Was there gold-standard empirical support, where the impact on actors subjected to the intervention was compared to a realistic counterfactual comparison of those who were not? 5) Costs to Implement: How expensive would it be to roll out, scale up, or sustain over time? 6) Political Feasibility: Did the intervention make sense in a low political-will context? Could it be used in a sectoral anti-corruption setting by being deployed to solve broader policy problems? The final column depicts our summary assessment of the total likelihood of policy success.

THE BOTTOM LINE

Once a specific sectoral strategy is selected, practitioners must then choose the tactics for achieving the sectoral goals, particularly the interventions that can be best employed to identify and constrain corrupt activities. After evaluating dozens of practitioner reports and 130 refereed academic studies, including 33 with rigorous impact evaluations, we determined that four families of interventions have the greatest chance of success, due to their coherent theories of change, empirical support, reasonable costs, and political feasibility. These include 1) transparency initiatives to inform citizens of the impacts of government programs and policies, which allow individuals to insulate themselves from bribe requests and monitor the budgets and fiscal dispersals of local and national leaders; 2) social audits, where non-state, civil society actors are provided with monitoring tools to hold corrupt officials accountable through policy and financial reviews and related watchdog functions; 3) e-governance reforms, which reduce corruption by removing lower-level bureaucratic discretion over regulatory procedures and eliminating opportunities for malfeasance by reducing the number of administrative nodes citizens and firms must navigate to access basic services and complete standard procedures; and 4) procurement reforms, which ensure open-access to government tenders, lowering opportunities for lucrative capture of contracts by connected and bribe-paying bidders.

SECTION IV. CASE STUDIES

In this section, we provide a summary of our case study research in Vietnam, Mozambique, Ukraine, and Peru. As we discussed in Section I, these countries were specifically selected to "process trace" the roll-out, maintenance, and scale-up of the four most propitious families of interventions selected from our evaluation in Section III. We employed a multi-method approach to documenting the story of the selected interventions in their local country contexts. Case study researchers began by reviewing the extensive academic and practitioner publications of the reform efforts, generating policy development timelines, listing key players, and collecting quantitative and qualitative evidence for reform successes and challenges. Next, key informants were selected for detailed semi-structured interviews where they were invited to discuss their views of the intervention, their understanding of political will and its role, critical challenges, and the importance of domestic and international partnerships. Interviews were assessed both qualitatively and quantitatively using content analysis software.

While we document the motivation for these anti-corruption reforms, the main goal of the case studies is to trace the evolution of successful anti-corruption programming in low political-will states. How were reticent political actors motivated to accept and even support programming that might reduce their power, political influence, and pecuniary benefits? How were bureaucrats incentivized to implement the reforms? How did international donors participate in the conceptualization, initiation, roll-out, or scale-up of the reforms? What other partners and stakeholders were necessary for the successful application of the interventions? How did the targeted interventions fit within the broader landscape of anti-corruption efforts in the country? And finally, what obstacles did the reform efforts encounter, and how well did they overcome them?

Below, we provide thumbnail descriptions of the interventions and their impacts, before distilling cross-cutting lessons that can be learned for practitioners intending to try similar programs in other settings. The full case studies can be found in Annexes VII-X.

IN-DEPTH CASE STUDIES OF HIGHEST-RANKING INTERVENTIONS: CASE SELECTION

After evaluating the evidence for ten widely studied interventions to motivate anti-corruption in low political-will states, we selected four for in-depth research based on 1) the coherence of their theoretical logic, 2) the level of empirical support, 3) the costs of implementation, and 4) the political feasibility in a low political-will context. We scored each reviewed intervention on a five-point letter grading scale and selected four families of interventions with the highest average scores. These included transparency initiatives, social audits, e-governance, and digital procurement. Next, we reviewed the academic and practitioner literature to identify country contexts where experts identified successful associations between the interventions and reduced corruption.

The highest-scoring family of interventions was transparency initiatives to inform citizens of the impacts of government programs and policies that allow individuals to insulate themselves from bribe requests and monitor the budgets and fiscal dispersals of local and national leaders. To better understand how transparency initiatives could be successfully implemented in a low political-will context, we chose the implementation of the REDD+[11] and a Draft Forest Law in Mozambique. These sectoral efforts to better inform citizens about deforestation and environmental sustainability led to a greater understanding of

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[11] Reducing Emissions from Deforestation and forest Degradation, where the plus denotes, "the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries."

how corruption was undermining environmental protection efforts by creating loopholes for the exploitation of natural resources, illegal logging, and illicit timber exports to China. Greater public awareness, facilitated by journalistic coverage, as well as local and international partners, generated momentum for greater efforts to curb corrupt activities as a means for stronger forest conservation efforts.

The second highest family of interventions is collectively known as social audits, where non-state actors, such as civil society organizations, non-government organizations, and business associations, are provided with monitoring tools to hold corrupt officials accountable through policy and financial reviews and related watchdog functions. Multiple countries around the world have implemented social audit initiatives, but we selected Peru, where a local effort, called the Citizen Brigade initiatives, was scaled up by Transparency International to become the comprehensive Proética Citizen Audits and Open Government Program. Proética was prominently involved in providing information to investigative journalists, who unveiled close government connections and payoffs from organized crime. The ensuing public outrage and formal investigation led to the formation of a high-level consultative commission that recommended ten concrete anti-corruption measures, including constitutional reforms.

E-governance reforms comprise the third family of interventions. These efforts reduce corruption by removing lower-level bureaucratic discretion over regulatory procedures and eliminating opportunities for malfeasance by reducing the number of administrative nodes citizens and firms must navigate to access basic services and complete standard procedures. We selected Vietnam to better understand these efforts because the government implemented the ongoing National Digital Transformation program that aims to move at least 80% of public service applications and administrative procedures onto a national portal that will also be available on mobile devices. The e-governance program was strongly motivated by a long-standing USAID project called the Vietnam Provincial Competitiveness Index (PCI), which ranked Vietnam's 63 provinces on their investment environment. A critical finding documented in multiple annual PCI reports was the relationship between burdensome business regulations and bribe requests, known as informal charges. These conclusions, which were reported on in thousands of Vietnamese newspaper articles, highlighted the need for regulatory streamlining to achieve government goals of creating an internationally competitive domestic private sector.

The fourth family of high-potential interventions includes procurement reforms that ensure open access to government tenders, lowering opportunities for lucrative capture of contracts by connected and bribe-paying bidders. We chose to study procurement through the lens of Ukraine's ProZorro, a digital e-procurement system built on the principle of total transparency that emerged through bottom-up citizen mobilization. ProZorro consists of a public procurement web portal that consolidates all electronic tenders in a central database, supported by an auction module and portal, all managed by a state-owned enterprise and coordinated by the Ministry of Economic Development and Trade. Civil society groups can then monitor transactions through the Business Intelligence (BI) model, while the private sector supports operations of the online marketplace. International donors contributed to feasibility studies for the effort and funded the scaling of the system from a pilot to a national-level program. The multi-stakeholder approach led to dramatic reductions in government spending, increases in the number of new vendors willing to compete for government contracts, and measurable increases in the value of procurement contracts on the site. Most importantly, reports of corruption declined from 54 percent to 26 percent in the year after ProZorro was launched. Although the ongoing war with Russia has waylaid many government activities, ProZorro continues to pay dividends by helping the identification of corruption in military procurement, which led to the resignation of the Minister of Defense.

CROSS-CUTTING FINDINGS

Regardless of the specific intervention, there are similarities in how practitioners' anti-corruption efforts are viewed and implemented in states characterized as lacking political will. In addition, the role of key stakeholders in civil society and media play important roles in publicizing these efforts to generate bottom-up support. The pages below briefly summarize a few of these cross-cutting insights.

COMPATIBILITY WITH SECTORAL APPROACHES

Critically, all of the successful interventions applied a "sectoral approach," which we defined above as targeting a specific policy problem that was important to policy-makers and other key stakeholders and opinion-makers. While we selected the four interventions because of their alignment with sectoral approaches, we were pleasantly surprised to see how the intervention families were used in the context of sectoral reforms in these four cases. Anti-corruption reformers did not attempt a full-frontal assault on an elite politician's favorite source of rents or call for high-level investigations and punishments; rather, they identified policy problems and issues that were important to the leader, demonstrated the role of corruption as an obstacle to these efforts, and advocated the interventions as a solution to the policy problem. Corruption was mitigated indirectly as part of a narrow, targeted approach to achieving a specific policy outcome. In Mozambique, leaders were concerned that illegal forestry activities and an illicit timber trade were exacerbating deforestation and climate change. In Ukraine, government officials understood that individuals and businesses were frustrated by an inefficient paper-based procurement system that led to low-quality public services and infrastructure construction, delivered by inefficient government contractors. Advocates highlighted the role of cumbersome regulations and arbitrary administrative processes in perpetuating these issues and showed how these problems were associated with bribe requests across multiple agencies. In Peru, while the role of corruption was ever present, rising costs of construction, education, and health, which were traced to administrative deficiencies in municipal governments, were a source of consternation for individuals in the populace and were undermining trust in local government and creating frustration. In Vietnam, reformers identified the government's need to strengthen the Vietnamese private small and medium-sized enterprises (SMEs), which were becoming a critical source of employment and investment, but were constrained in their ability to grow and compete globally.

BUY-IN BY SERVING THE INTERESTS OF POLITICIANS AND BUREAUCRATS

Sectoral approaches facilitated government buy-in to support reform efforts by aligning the interests of politicians and bureaucrats with anti-corruption reforms. A critical example of this alignment can be found in how Vietnamese bureaucrats echoed the language and goals of e-governance advocates in their public statements about the efforts, connecting those to the problems faced by SMEs. Pham Duyen Phuong, Deputy Director of the Information Technology and Statistics Department at the General Department of Customs, for instance, described the effort within the customs space this way:

> "The one-stop-shop mechanism saves time and money for businesses. It's more important that as the electronic system restricts contact between businesses and state management agencies, it also reduces corruption, red tape, and inconveniences. On the other hand, state governance will improve

because of more transparent and reliable information being handled." (Vietnam Extends Link to One-Stop-Shop Portal, 2018)

Sectoral strategies for anti-corruption reform created a "willingness" to assist reform efforts by aligning the incentives of reformers with veto players, i.e., actors with the power to block the policy process (Tsebelis 2002), with the goals of anti-corruption advocates. Interlocutors in our interviews rarely used the specific term *political will*, but all recognized that the willingness of government actors—whose pecuniary interests may have been threatened by the interventions—to support or at least not interfere in the interventions was necessary for success. All experts recognized that politicians could block permissions, withhold funding, slow-roll important legislation and regulations, or intervene coercively to block interventions from reaching their potential. Similarly, bureaucrats could delay or shirk implementation responsibilities. At all times, there were opportunities for elite actors to get cold feet and reverse course. At other times, their incentives could shift in a negative direction due to external forces. Generating bottom-up support through work with civil society and media could constrain some of the worst behaviors, but ultimately, even these activities could be squelched by threatened elites. As a result, to keep the process moving, constant attention to reiterating the importance of these efforts for addressing the sectoral policy goals was necessary. Recognizing this point, Pham Thanh Nga, one of our anti-corruption champions and an arbitrator at the Department of Justice, told us, "The willingness of the government and the citizens is the main driver of success."

THREE STAGES FOR DONOR INVOLVEMENT

International donors and development practitioners played key roles in all four cases, but their efforts manifested at different stages in the policy development and implementation process and supported change in different ways. We can distinguish three potential stages where donors can target their activities: 1) problem identification, 2) policy development, and 3) scaling up.

Problem Identification: In Vietnam, USAID's funding of the Vietnam Provincial Competitiveness Index (PCI) highlighted both the negative effects of regulation on SME development but also the strong association between cumbersome and arbitrary regulations and bribe exposure. The government's identification of e-governance as a potential solution occurred many years after the PCI first documented the problem.

Policy Development: In Mozambique, the United Nations and the World Bank helped with the implementation of the REDD+ framework legal drafting for the Forestry Law. In Ukraine's development of ProZorro, the inspiration came from Olexandr Starodubtsev, an individual Ukrainian citizen, but the USAID and European Bank of Reconstruction and Development (EBRD) recognized its potential and provided technical assistance for product development and roll-out. Reflecting on the role of international donors in Ukraine, Julia Dvornyk, a business analyst, confided in an interview:

"Their role was very important in supporting the reform, in supporting the development of the system, and monitoring its progress also, and making sure it was successfully transferred to the state-owned enterprises after the pilot and when the system went full scale."

Policy Scale-Up: After the initiation of Proética social audits in Peru, Transparency International and its donors, including the Hewlett and Open Society Foundations, provided support for the organization to

develop a scalable model and assist with processes such as document collection and review that could be applied to a range of different social services. The EBRD played a similar role to the ProZorro procurement system.

> "When the donors and NGOs and politicians saw this concept works after the successful pilot, I believe this was the key important thing for this whole idea to evolve further on. It's an important clarification that donors supported the system from the start—from the moment the system was developed for the pilot. Further support and recognition came after the pilot."

USING PARTNERSHIPS TO ADVANCE LOCAL ACCEPTANCE AND INTEGRATION

Partnerships with non-government organizations (NGOs) and other non-state actors, such as business associations, were critical in all cases. These partnerships generated local acceptance of the interventions and helped steer evidence from the research and pilots into the policy-making process. The critical role of local partnerships in generating reform momentum and identifying contextualized solutions for policy problems led one of our respondents Alan Hudson, the Executive Director of Global Integrity, to reframe the concept of political will around these connections. In so doing, he deviates from the standard definitions presented in Section 1 to highlight the important role that local expertise plays in creating the enabling environment for reform.

> "Political will is really about helping local partners address complex challenges to governance and corruption. Political will has to be understood from local expertise that comes from their lived experience and local knowledge of their contexts. Only they can decide what solutions should emerge; locally led understanding of political will and windows of opportunity and locally led emergence of solutions."

In Vietnam, USAID's cooperation with the Vietnam Chamber of Commerce and Industry (VCCI) as a partner in the production, publication, and dissemination of the PCI report helped make sure findings were communicated to and accepted by local governments. This was especially true after the PCI was handed directly to VCCI through the USAID Forward program in 2014. In the Vietnamese administrative hierarchy, VCCI has an official role as the primary voice for business, including in legal drafting committees and National Assembly. As a result, research findings were transmitted directly into the policy-making process. In fact, in 2014, the PCI project was formally asked to use data to help monitor governance reform in Vietnam's 63 provinces.

In Peru, the original social audits in *Los Olivos* were organized by a mix of civil society groups and individual volunteers. Later, the commission that recommended major corruption reforms using social audit information included members of Proética, wider civil society, and anti-corruption activist Allan Wagner, former Peruvian Ambassador and at that time the president of the Association of Civil Transparency, who served as president of the commission.

In Ukraine, a critical development in the roll-out and popular acceptance of ProZorro was partnering with civil society organizations, that then received training on how to access and use the data in their

specialized investigation. Indeed, the Ukraine case highlights how a more invigorated civil society sector, following the Maidan protests in late 2013, felt newly empowered to use the information generated by the platform.

In Mozambique, interview respondents flagged the role that donors played in funding civil society organizations to use evidence revealed by the new transparency programs to investigate the role of corruption in the illicit time trade, eventually creating the enabling environment for government reform efforts.

THE ROLE OF RESEARCH AND JOURNALISTS

All four interventions were augmented by programmatic efforts to make research findings and data available on corruption for journalists and external researchers to access and use. Media attention to these corruption stories generated bottom-up momentum to help exert pressure on elites for further reform efforts. In Mozambique, national and international investigative journalists gained a wide readership when they took advantage of newly released information to publish stories on the continued illegal timber export to China, including the 2020 confiscation of 100 containers of whole logs. The Vietnam case also documents hundreds of newspaper stories, including "above-the-fold" political cartoons, which used PCI data to connect cumbersome regulations to bribe requests by bureaucratic officers. Discussing the role that publicly available data on corruption played, Duy Trinh, a data scientist from Princeton University, told us:

> "A lot of researchers have been able to use the website to produce their own statistics. Mostly the audience has been the public which is reading more and more about this. This is sustaining political will, since the public dislike corruption."

Journalists were regular users of the ProZorro platform, who logged on to investigate corruption in government sectors in narrow, specialized sectors. Indeed, journalists working with ProZorro data have flagged corrupt military procurement during the war, ultimately leading to the resignation of the Minister of Defense in 2023. Isliamov, one of our respondents, described the influential role of transparency in the procurement platform this way:

> "ProZorro is a case of how playing with data, and I would say privacy, gives the country the ability to see certain things, because some would say that whatever ProZorro is doing is not right because it publishes the names, publishes addresses, companies, affiliates, everything you can see completely through every transaction."

In Peru, journalist investigations into the *Lava Jato* (Carwash) and *Los Cuellos Blancos* (White Collar) scandals led to the proliferation of additional social audits, as citizens demanded greater accountability of local and national officials. Camilo Carilla Purin, one of our respondents and an executive at Ernst and Young, described the process as follows:

> "The trigger was public opinion after confessions of high directives of Odebretch were made public in the United States about projects in each

country. Immediately after, they started to ask what projects were taking place in Perú, and investigations followed."

DECADES, NOT YEARS

Though there are certainly cases when reforms happen quickly (Ukraine), more commonly (Vietnam, Mozambique, and Peru), anti-corruption in contexts with low political will has a long gestation process. Reformers should not expect a short, linear process between the onset of interventions and reductions in corrupt activity. It can take significant time, and some experience with setbacks, for ideas about anti-corruption reforms to filter into public conversations. It takes time for policy-makers to be convinced of their benefits, and even longer for the reform legislation to be crafted and finally implemented. International donors should understand and respect localized timelines and reform consolidation processes.

Vietnamese PCI documentation of the relationship between regulation and corruption began in 2005, but Vietnam's *blazing furnace* anti-corruption campaign did not begin until 2016, and the formal legislation for the national e-government portal did not pass until 2018. The first REDD+ working group in Mozambique was launched in 2009, but it took until 2020 for the draft Forestry Law to be reviewed by the Ministry of Land and Environment, and increases in prosecutions of forestry crimes were not observed until the 2020-2023 period. Ukraine's ProZorro was launched in 2014, but the national procurement law enforcing the nationwide use of e-procurement was not published until 2016. In Peru, social audits through Proética were first initiated in 2005; however, the major corruption reforms recommended by the high-level consultative commission have still not been legislated in earnest.

WINDOWS OF OPPORTUNITY

Reform efforts were often framed within the context of a window of opportunity. Even when the process to reform was long, critical junctures created opportunities for internal champions and reform advocated to move forward previously stuck initiatives. Respondents highlighted shocks to the status quo of "politics as usual" that both demonstrated the negative effects of corruption and re-aligned the incentives of entrenched elites, who had previously blocked reform efforts.

In Vietnam, country analysts point to the end of an elite political squabble that led to the exit from office of the former Prime Minister in 2016, allowing the General Secretary of the Party to launch the investigation, reforms to party statutes, and e-governance initiatives that formed the three pillars of high-level reform efforts. In Peru, several elite corruption scandals propelled information generated by Proética into the elite consultative commission that recommended major anti-corruption efforts, including constitutional change. In Mozambique, there was no single moment or single initiative. Instead, donors responded to a series of windows of opportunity; first, gathering data to help address locally-driven needs (deforestation) and then launching more complex initiatives (REDD+). These, in turn, helped drive a New Draft Forest Law, and with the "help" of the Hidden Debt Scandal, these initiatives have led to even more substantial changes and broader anti-corruption initiatives. Ukrainian experts highlighted the burst of space for civil society and governance reforms in the wake of the Maidan protests in late 2013. This was when policy entrepreneurs first conceived of ProZorro. As one participant in the procurement reforms put it to us in an interview:

> "It was post-Revolution of Dignity, and many new people came from the government, and people who came from the private sector. You could say they were technocrats, so they implemented several techniques that they learned in the private sector, and they used them in governmental management. And it was an important, I believe, an important window of possibilities for these changes."

Donors cannot generate or initiate windows of opportunity, but they can help local actors to leverage these moments. During such key moments, donors can help by making transparency data available to civil society and journalists, providing evidence of best practices from other settings to policy-makers, and providing funds for program development, implementation, and scaling up. Donors can help organizations build institutional capacity and skills to enable them to have stronger impact when windows of opportunity emerge. Donors can also help local actors to navigate obstructions and challenges by offering legal and even psychosocial support. This understanding of the process—iterations of change that lead to the evolution of the environment and windows of opportunity—motivates the DCID Research team to suggest replacing the term "tipping points," which can imply a more adversarial role than what this research has revealed, to windows of opportunity.

In Vietnam, USAID laid the foundation with PCI, but other USAID projects and donors, such as the United Nations Office on Drugs and Crime (UNODC), European Union, and UKAID, were available to provide technical assistance on the implementation of e-governance activities at key moments to help take the next step forward. In the ProZorro and Proética cases, donors recognized the potential of homegrown initiatives, helping them to reach an impactful scale when windows of opportunity emerged. In the Mozambique case, funding to help journalists and civil society use newly transparent financial documentation allowed for deeper probes into corrupt behavior when political space emerged. As an anonymous respondent described the role of donors in Mozambique:

> "Donors did less in creating an enabling environment except in supporting forest civil society organizations and investigative journalists that assessed continued corruption in the forest sector. To the extent that donors funded these two sectors, that helped to create an enabling environment."

THE BOTTOM LINE

In attempting a sectoral anti-corruption reform strategy, practitioners must implement these interventions, maintain their activities, and ensure their continuance when faced with political headwinds or leadership transitions. To provide guidance on overcoming these challenges, we studied the implementation of the above anti-corruption reforms in four cases: 1) Vietnam (e-governance), 2) Mozambique (transparency initiatives), 3) Ukraine (procurement reforms), and 4) Peru (social audits).

In all cases, change was permitted within the context of a window of opportunity when "the system" was suddenly and dramatically challenged. Shocks to the system both demonstrated the negative effects of corruption and re-aligned the incentives of entrenched elites, who had previously blocked reform efforts. Successful reforms included transparency in producing objective data, partnering with local actors who could disseminate and insert data and policy implications into public debates and policy-

making processes, and encouraging use by journalists to create bottom-up pressure for reform. International donors and development practitioners played key roles in all four cases, but their efforts manifested at different stages in the policy development and implementation process, specifically: 1) problem identification, 2) policy development, and 3) scaling up. The key features of each case study are highlighted in **Table 6** (below).

We also offer cautionary notes based on setbacks in intervention roll-out and scale-up. Anti-corruption in environments of low political will has a long gestation process; reformers should not expect a short, linear process between the onset of interventions and immediate reductions in corrupt activity. Reformers should avoid creating "super institutions" outside the existing government and organizational frameworks. The case studies show that these result in the marginalization of existing structures and created discontent, fragmentation, and conflict within existing institutions. Lack of coordination between policy experts and political institutions can undermine implementation, so efforts should be made to align not only incentives but also timelines and performance objectives.

With these lessons in mind, we point readers to the detailed individual case studies in <u>Annexes VII-X</u>. To assist readability, we have structured each of the cases similarly. We begin with the country's context, sectoral policy problem, and the role of corruption in exacerbating the problem and then demonstrate how the intervention targeted these issues. Along the way, we provide contextual details on economic structure and political economy and lay out the specific details of the policy problem government stakeholders hoped to combat and the initiation and implementation of the anti-corruption intervention. In the final section, we provide commentary and policy conclusions that are generalizable, though framed within the country context of the case analysis.

Table 6.   Key Features of Case Studies

FEATURE	VIETNAM	MOZAMBIQUE	UKRAINE	PERU
Intervention Family	E-Governance	Transparency	E-Procurement	Social Audits
Sectoral Policy Problem of Leadership	Barriers to private sector SME development	Deforestation caused by illegal logging	Inefficient and wasteful paper-based procurement	Public dissatisfaction with public service delivery in infrastructure and healthcare
Window of Opportunity	End of elite political fight blocking	Need to redraft forestry law and hidden debt scandal	Maidan political protests in 2014	Operation Car Wash and other elite scandals
Key Domestic Partners	Business associations	Environmental NGOs	Civil Society Organizations	Civil Society Organizations
Key International Partners	USAID	United Nations and World Bank	USAID and the European Bank of Reconstruction and Development	Hewlett Foundation and Open Society Foundation
Role of Donor	Problem identification	Policy development	Policy Scale-Up	Policy Scale-Up
Shared Data with Journalists and Civil Society	Yes	Yes	Yes	Yes
Evidence of Reduced Corruption in the Sector	Yes	Not yet	Yes	Not yet
Initiation Year (Years before the Anti-Corruption Program)	2005 (11)	2009 (11)	2014 (2)	2016 (TBA)

SECTION V. CONCLUSIONS & PATHWAYS FORWARD

Since 2020, there has been a shift in the way the United States Government addresses anti-corruption. Across a large range of initiatives, new anti-corruption messaging and priorities are emerging. Anti-corruption is now an important element of U.S. diplomatic efforts around the globe, including the development of the USAID Anti-corruption Task Force (ACTF). This report broadly seeks to align with the objectives of the five pillars of the U.S. Strategy on Countering Corruption and specifically to help USAID in modernizing, coordinating, and resourcing U.S. government efforts to fight corruption.

This Learning Activity has been framed around two main questions:

- What does USAID need to know about political will in countering corruption?

- How should USAID programming to combat corruption account for and influence political will, particularly where it is weak?

DCID's research to answer these questions evolved through three stages: 1) A literature review of the three-decade history of political will in anti-corruption programming and the assembly of political economy tools for measuring the incentives and powers of political actors in developing-country settings; 2) An evaluation of the most prominent anti-corruption programming interventions based on hundreds of articles from the academic and practitioner literature, which were used to identify the four families of interventions with the greatest probability of success; and 3) Four detailed case studies of the implementation of these interventions in low political-will states to identify key ingredients for successful implementation, maintenance, and scale-up.

WHAT DOES USAID NEED TO KNOW ABOUT POLITICAL WILL?

Anti-corruption advocates often lament that their efforts to promote institutions and policies to combat corruption are undermined by the low political will of politicians and elite bureaucrats, who block their initiatives outright, slow-roll their implementation, or undermine their influence by depriving them of resources, or creating countervailing rules or institutions. Because political will is presumed to be at the core of these choices, practitioners have suggested that anti-corruption reforms must first begin with efforts to alter the will of politicians. In this report, we argue that these efforts are misguided; elite politicians, whose income or power is dependent on corruption, will not be amenable to direct anti-corruption programming, especially programming that empowers sanctioning agents (i.e., courts or special prosecutors) who will punish them for their activities.

In the context of anti-corruption programming, analysts often define political will as the commitment of national or local leaders to undertake actions that reduce corruption in their jurisdictions and to sustain the costs of those actions over time (Roberts 2017). In practice, there are five underlying logics informing a diagnosis of low political will. First, the politician or bureaucrat benefits personally from the corruption and is unwilling to forego the income or other pecuniary benefits that it provides. Second, a politician may owe their political power to their ability to distribute corrupt rents to other elite politicians. Third, a politician may be captured by economic actors, such as state-owned enterprises (SOEs), connected companies, or powerful oligarchs, who are resistant to reforms and put pressure on the politician to thwart them. Fourth, a powerful leader may be sincerely interested in corruption but may face roadblocks from powerful subordinates who benefit from the status quo. Fifth, a lack of

capacity can be confused with a lack of will; a politician may be incentivized to tackle corruption but may lack sufficient resources and expertise.

Reviewing the long three-decade history of research on political will regarding corruption, we argue that the term political will is extremely problematic and inappropriate as a foundation for development programming. The concept of political will is inherently difficult to measure, resulting in a "black-box" effect. Common use of the term obscures the specific reason for low political will (i.e., personal benefit versus capture by elite interests) and can also conflate motivation with the capacity to implement. Such opacity prevents targeted interventions for change. Usage of the term also places disproportionate agency on individual anti-corruption champions, when the literature shows that more broad-based support and commitment are necessary to sustain reform efforts. Most perniciously, usage of the term is tautological. That is, when programs fail, analysts blame political will. When they succeed, they assume its presence.

Even if a clear operationalization of political will were possible, we argue that efforts to promote elite-level anti-corruption reforms in states characterized as having low political will are misguided. Politicians and bureaucrats, whose income or power is dependent on corruption, will not be amenable to direct anti-corruption programming, especially programming such as empowering judicial investigations or Anti-corruption Agencies (ACAs), which might punish them for their activities. Moreover, these officials are savvy political operators, who cannot be easily deceived or tricked. They will understand when even very low-level anti-corruption programming endangers their rents or power, and they will quickly move to disrupt them.

HOW SHOULD USAID PROGRAMMING TO COMBAT CORRUPTION ACCOUNT FOR AND INFLUENCE POLITICAL WILL, PARTICULARLY WHERE IT IS WEAK?

We recommend an alternative sectoral approach that aligns anti-corruption programming with mainstream policy goals that the leader wants to achieve, such as improvements in education or economic development. Here, anti-corruption enters indirectly ("through the side door") by furthering the elite's sectoral policy objectives. Next, practitioners must select the appropriate intervention that can both accompany the sectoral programming and simultaneously reduce corruption in the chosen sector. Four factors are required to make this choice. First, practitioners must ensure that the theoretical logic of the intervention, using well-established political economy tools to ensure that the intervention appropriately incentivizes key actors, works within the constraints of the locality's institutional setting. Second, practitioners should choose interventions that have sufficiently rigorous empirical evidence of impact. Third, practitioners should account for the costs of implementation, including start-up, sustainability, and scale-up. Finally, practitioners should ask whether the reform is feasible in low political-will contexts or will leaders seek to undermine it, because it threatens their personal benefits or the rents of other elites or entrenched actors.

Our review of the literature regarding these four criteria highlights four well-suited intervention families: transparency initiatives, social audits, e-governance, and digital procurement. The highest-scoring family of interventions is transparency initiatives to inform citizens of the impacts of government programs and policies, allowing individuals to insulate themselves from bribe requests and monitor the budgets and fiscal dispersals of local and national leaders. The second highest family of interventions is collectively known as social audits, where non-state actors are provided with monitoring tools to hold corrupt politicians accountable through policy and financial reviews and related watchdog functions. E-

governance reforms comprise the third family of interventions. These efforts reduce corruption by removing lower-level bureaucratic discretion over regulatory procedures and eliminating opportunities for malfeasance by reducing the number of administrative nodes citizens and firms must navigate to access basic services and complete standard procedures. The fourth family of high-potential intervention includes procurement reforms, which ensure open access to government tenders, lowering opportunities for lucrative capture of contracts by connected and bribe-paying bidders.

The four case studies of these respective intervention families are found in Vietnam (e-governance), Mozambique (policy transparency), Ukraine (digital procurement), and Peru (social audits). They illustrate how these efforts can be aligned with a sectoral strategy for effectively targeting political will. Across case studies, change (political will) was framed within the context of a window of opportunity. Respondents highlighted shocks to the system that both demonstrated the negative effects of corruption and re-aligned the incentives of entrenched elites, who had previously blocked reform efforts. Successful implementation, however, went beyond simply identifying relevant local policy problems. Critical mediating factors included a policy of transparency in producing objective data, partnering with local actors who could disseminate and insert data and policy implications into public debates and policy-making processes, and encouraging use by journalists to create bottom-up pressure for reform. International donors and development practitioners played key roles in all four cases, but their efforts manifested at different stages in the policy development and implementation process, specifically at the stages of problem identification, policy development, and scaling up.

REFORM IMPLEMENTATION SUGGESTIONS

Drawing on the research above, we suggest the following approaches to the successful implementation of anti-corruption reforms in low political-will contexts.

- **Identify a salient policy goal** of elite political stakeholders and work with them on devising programming interventions to solve that high-level problem where a specific type of corrupt behavior may be an obstacle to achieving that goal.

- **Choose a policy intervention** from our menu of high-scoring interventions (e.g., these case studies) or a new approach that has demonstrated empirical support, presents a clear theory of change for addressing the specific corruption type, is relatively low cost, and is feasible within the local political context compatible with the sectoral reform selected.

- **Adapt and employ recognized USAID tools** for political economy analysis, such as Thinking and Working Politically (TWP) (overviewed in **Section I**, alongside several other tools), to identify the important national and political actors, their incentive structures, powers, and constraints, which inform the five logics of low political will. Map out the steps necessary to achieve successful political legislation and implementation of policies necessary to resolve the sectoral problem and the corresponding corruption.

- **Prepare the groundwork** if a window of opportunity for political change is not immediately available through objective research documenting the policy problem and its relationship with corruption.

- **Engage in a policy of programmatic transparency**, make objective data from research on reforms in the sector, including corruption reductions in the sector, publicly available, and

supplement the transparency with facilitation workshops and training on how journalists, civil society actors, and local politicians can access and use the data in their work.

- **Identify local partners within government agencies, NGOs, business associations, and local governments** who can help localize reform approaches and insert key findings into domestic policy debates.

- **Leverage the external pressure of geopolitics and global citizenship**. When political will at the national level appears to be low, leaders and civil society may indicate some willingness to align with, for example, the EU, OECD, "the West," and the UN Convention on Anti-Corruption. USAID can acknowledge, reference, reinforce, and co-create these aspirations where appropriate.

- **When windows of opportunity emerge, provide resources and technical assistance** for feasibility studies, roll-out, and scaling up of the anti-corruption intervention.

- **Engage with journalists and civil society** to generate bottom-up support for the intervention through transparent provision of data, thereby constraining the veto space for threatened officials.

- **Monitor processes and evaluate impact** throughout the program cycle to make sure the interventions are achieving program objectives and stakeholders' incentives are aligned. Use new learnings to adjust and course corrections when problems are uncovered. Given the long gestation period for reforms to yield success, formal impact evaluation tools, such as randomized experiments, may not show success for many years. Consequently, a Collaborating, Learning, and Adapting (CLA) approach to process evaluation could be deployed in the interim.[12] This would permit iterative learning, adaptation, and, ultimately, improvement throughout the program cycle.

- **Strengthen local institutions, organizations, and actors** necessary for intervention success using tailored training modules for the intervention that are contextually appropriate and continue training throughout the intervention rather than as a one-off activity.

- **Work through existing policy-making processes and institutions**. Avoid creating "super institutions" outside of the existing government organizations. The case studies found that these extra-organizational institutions result in the marginalization of "existing structure and created discontent, fragmentation, and conflict within existing institutions."

- **Improve coordination and communication between experts and government actors**. Expert interviews revealed instances where despite robust cooperation and planning among stakeholders for sectoral interventions, poor communication undercut implementation efforts. USAID can mitigate these issues by ensuring that programs are developed, implemented, and monitored by, with, and through local partners.

- **Consider legal barriers or weak legal implementation**. Case study analysis indicates that in some instances, past donor programs have circumvented or ignored corruption during implementation. For example, countries may be a signatory to international law such as the United Nations Convention on Anti-Corruption or have local sectoral laws that include anti-corruption

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[12] https://usaidlearninglab.org/cla/cla-toolkit/understanding-cla

embedded within. Instead, USAID should ensure programs reinforce and support legal measures at local, national, or regional levels. As Rafael, a respondent from Mozambique put it:

> "The donors must reinforce those points with legal measures so that the misconduct can be held accountable by decision-makers. Or it will be a vicious circle of enabling, supporting, and sustaining corruption."

As this study concludes, the DCID Team invites USAID to learn more about the Anti-Corruption Champions in Annex XIII, all experts in various sectors, who informed our understanding of political will and worked with us on the details of the case studies, providing important insights into key informants and the learning questions. Although this learning activity emphasizes coalitions and broad-based support for enabling, supporting, and sustaining political will, the role of individuals in mobilizing demand for change cannot be overemphasized. We gratefully present them below.

ANNEX II: SOURCE MATRIX: DEFINITIONS AND INDICATORS OF POLITICAL WILL

Work database (Excel format) available here:

https://www.dropbox.com/s/13brz23v2utyca4/3_25%20All%20Excel%20PW%20Bibliographies_%20Final%20Report.xlsx?dl=0

ANNEX III: LITERATURE REVIEW ON THE EVOLUTION OF *POLITICAL WILL*

The documents informing this analysis are based on the sources listed in an Excel matrix. (See Annex I.) The matrix represents an exhaustive list of readings (from peer-reviewed journals to blogs) on political will from 1998 to 2022. Each source is indicated by the source title, citation, and the type of literature (grey, academic, technical guidance) with an accompanying link.

The DCID Team analyzed each source according to stakeholder focus (politicians, bureaucrats, citizens); the methodology employed by authors to define or measure political will; the scale at which each source focuses (national, subnational, local); and, finally, any assertions, either explicit or implicit, about how to increase political will where it is either high or low, as requested by USAID. Each source analysis concludes with relevant insights about any of the other USAID Learning Questions.

The research team encourages USAID to peruse the matrix for more granular detail about each source as needed.

1998-2008

As the global community began to understand and address the corrosive effects of corruption on development, the concept of *political will* emerged in the late 1990s to 2000 to account for why some anti-corruption reforms succeeded and others failed. These early writings were primarily in the form of concept notes and academic papers wrestling with "a set of complex circumstances that incorporate individual leaders' aspirations, the systemic benefits from hypothetical changes in rules and behavior, and the belief in the ability to muster adequate support to overcome resistance from those stakeholders whose interests will be most damaged by reform" (Kpundeh, 1998, p. 93). The focus was on anti-corruption efforts writ large, as opposed to reforms within discrete sectors such as education, health, or governance. The implied theory of change was that political will was a sequencing concept; that is, political will must be present for an anti-corruption reform project to be successful.

Operationalization of the term was problematic from the beginning. Brinkerhoff (1998, 1999) noted that political will as a concept suffered from 1) no clear measurement strategy, 2) potential aggregation bias (i.e., weighs every characteristic equally when it comes to measurement), 3) lack of guidance and methodology for cross-comparison across different cases, and 4) an unclear locus of initiative, i.e., whether political will ranged from high to low, or whether it was initiated by external actors inducing/coercing reformers.

Even as the concept of political will emerged, other scholars cautioned against the notion of political will as being of relevance at all. Hammergrem (1998, p. 4), in his review of Latin American case studies on anti-corruption, argued that "political will is too simplistic a concept to capture a far more complex

process of reform 'mongering.' Unless that complexity is taken into account, one is likely to find that few countries, even those where reform has progressed, had 'political will' to start."

By the early 2000s, while the conversation was still dominated by academic writing, political scientists moved to more clearly define the term and develop indicators for measurement. Definitions ranged from "generally denoting robust consensus on action among political elites" (Fritzen, 2005, pp. 79-80) to "the demonstrated credible intent of political actors such as elected or appointed leaders, civil society watchdogs, stakeholder groups, and so forth" (Kpundeh & Dininio, 2006, p. 41). These definitions emphasized the intentions and efforts of political actors, neither of which were clearly defined, although the implication was that "political will" should come from high-level political elites rather than grassroots societal actors and constituencies.

"But as an explanatory category, [political will] it has an elusive quality. Institutional interests (even among elites) are nearly always fragmented, and never more so than when changes in the institutional rules of the game affect resource accumulation strategies. Political will can thus often be a front for what amounts to a symbolic or 'ideological' policy."

Fritzen, 2005, p. 80

SUMMARY

First-generation writings on political will were impeded by a concept that involved intent and motivation, which are inherently intangible phenomena. Hard to assess accurately or objectively, its presence or absence was prone to manipulation and misrepresentation. Finally, there was no differentiation between its existence at either the individual and/or collective levels (Brinkerhoff, 2010).

2009-2015

During this timeframe, Post, Raille, and Raille (2010, 659) provided a more detailed definition of political will as the "extent of committed support among key decision-makers for a particular policy solution to a particular problem with 1) a sufficient set of decision-makers, 2) with a common understanding of a particular problem on the formal agenda, 3) committed to supporting, 4) a commonly perceived, potentially effective policy solution."

Academics (who continued to dominate the literature on political will), including Ristei (2010), began to move away from the focus solely on the country and political leadership levels to a more nuanced understanding of context and a broader range of stakeholders. Specifically, within anti-corruption reforms, there should be:

"Contemporary policy discourse on political will is based upon a circular and voluntaristic (repeated tendency towards explaining that some countries are just more prone to corrupt leaders), with no good explanation understanding of leadership, making it suffer from severe theoretical shortcomings… and commonly fails to explain why no reform happens other than 'leader was a liar,' and so often engages in post hoc reasoning (only way to measure political will is after the fact), with too much emphasis on personality and traits of individual leaders."

Persson, Anna, & Sjöstedt, 2012, p. 618

1) Analytical rigor in diagnosing corruption—major steps taken to assess how corruption works and what is required to stop it.
2) Inclusion and cooperation of principal stakeholders—collaboration between government, political parties, and civil society during anti-corruption initiatives.

Guidance for building political will both as an enabling factor and an outcome was available to policymakers and anti-corruption experts and was included, for example, in CMI's 2010 Guidance Note.

Table 7.   CMI's 2010 Options to Strengthen Political Will

POLITICAL-WILL COMPONENT	ILLUSTRATIVE OPTIONS FOR DONORS	
	TOP-DOWN SUPPLY SIDE	BOTTOM-UP DEMAND SIDE
Government Initiative	Identify and support public officials committed to AC	Identify and support civil society organizations
Technically Sound, Cost-Effective Program Choice	Provide technical assistance in AC policy analysis, formulation, program design	Provide technical assistance in citizen satisfaction surveys, including for public service delivery
Mobilization of Stakeholders	Support public education campaigns, outreach to citizens' groups	Provide support to civil society constituency and advocacy coalitions Encourage CSO-private sector partnerships
Public Commitment and Allocation of Resources	Support national/sectoral budget formulation processes and external auditing structures	Encourage CSOs engaged in participatory budgeting exercises
Application of Credible Sanctions	Support rule of law reforms; training for investigators, lawyers, and judges	Offer training for watchdog organizations and journalists
Continuity of Efforts	Multi-year funding for anti-corruption and sectoral interventions	Provide grants to CSOs and encourage media to publicize successful AC efforts
Learning and Adaptation	Support monitoring, evidence-based decision-making, program evaluation, and political economy analysis methodologies	Support transnational civil society organizations and South-South cooperation

From: CMI U4 Brief. 2010. Unpacking political will to confront corruption.

Looking at the guidance more closely, however, the research team's analysis indicates that a significant proportion of studies related to political will did not provide specifics or guidance for context or political economy analysis, nor did the revised definitions or technical guidance in building political will include specific measures. As a result, the former continued to rely upon theoretical concepts such as intent and perception, which are difficult to precisely measure using standard empirical instruments such as surveys or textual analysis. The latter, while expanding the need for top-down and bottom-up approaches, required more contextual methodologies to better target and refine the "supports" recommended.

SUMMARY

The literature on political will evolved to more precise definitions, but measurable indicators remained unexplored. The focus was primarily on high-level political elites and efforts to discern whether political will was an enabling factor or an anti-corruption reform outcome. Newer scholars from this period

recognized the need to include and analyze institutional factors (formal and informal, micro and macro), structures, and patterns of corruption (appointment systems, patronage networks). During this time, the concept expanded, calling for opportunities for political participation amongst a broader group of stakeholders, including civil society, external actors (donors), and bureaucrats.

2016-PRESENT

Attempts to define and establish (somewhat) clear definitions and measures peaked around 2010. Much of the subsequent literature aligned with Brinkerhoff's indicators, which were perhaps less quantitative and measurable and more descriptive, to include:

1) *Locus of initiative*: determination if initiative for reform comes from the actual reformer or external actors inducing/coercing that reformer (ranking from high to low).
2) *Degree of analytical rigor*: the extent to which the reformer, or reform team, undertakes an in-depth analysis of corruption and uses that analysis to design a technically adequate and politically feasible reform program (ranking from high to low).
3) *Mobilization of support*: willingness and ability of the reformer/team to identify and mobilize support for anti-corruption activities (with indicators framed in terms of many versus few efforts, strong versus weak, and/or effective versus ineffective; with the former of each of these being associated with stronger political will).
4) *Application of credible sanctions*: a strong application of highly credible sanctions is associated with a greater degree of political will. The weak application of ineffective sanctions signifies a lower degree of political will (degree of application from strong to weak).
5) *Continuity of effort*: allocation of ongoing effort and resources in support of anti-corruption activities.

Currently, the Biden administration has joined the unprecedented global push for anti-corruption reforms, especially regarding financial crimes, with a host of anti-money laundering and counter-terrorist financing (AML/CTF) efforts, sanctions regimes, and renewed interest in beneficial ownership, politically exposed persons, kleptocracy, and offshore tax havens.

Though Johnston (2017) dismisses political will as "magical thinking," Jackson and Amundsen (2022, 10) are more measured: "The not-altogether-useful phrase implies inaction by political elites, but it does not explicitly show how powerful actors deliberately resist, circumvent, or instrumentalize reforms." These obstacles can be related to the informal policy arena; that is, cycles of extraction and power preservation can occur outside of formal institutions: political corruption is high where formal frameworks are weak and informal spaces are stronger. Their theory of change is that 'bottom-up' interventions from coalitions of anti-corruption practitioners can build a critical mass against politicized corruption and support routes to genuine change.

Presently, the literature to measure and assess political will has evolved into providing technical guidance, case studies, and the presentation of methodologies. These methodologies shift the focus from the country level, national politicians, and governance to highly contextualized guidance that can be applied across sectors. Of note is the Serious Organised Crime and Anti-Corruption Evidence (SOC ACE) Research Programme. This long-term research initiative aims to help 'unlock the black box of political will' for tackling serious organized crime, illicit finance, and transnational corruption through research that informs politically feasible, technically sound interventions and strategies enabled through

the efforts of a broad range of stakeholders. The ongoing research and technical platform are comprised of five pilot themes: 1) political will and SOC; 2) political will, SOC, kleptocracy, and illicit finance; 3) political will, SOC, and sanctions; 4) political will and trafficking; and 5) political will, SOC and COVID-19. Before moving into these methodologies, it is necessary to note other scholars in the academic literature presenting quantifiable indicators of political will.

The most explicit presentation of measures and methodologies to assess political will is established by Scheye (2020). Tackling the problem of motivation, intent, and quantifiable indicators head-on, he asserts that the work of Brinkerhoff continues to remain influential. Similarly, using case studies of Singapore and Bangladesh, Ankamah and Khoda (2018, p. 11) show "how political will is a necessary condition in a government/country's anti-corruption efforts, although may not be sufficient." They further show that the components of political will, "the origin of anti-corruption initiatives, credible sanctions, resource dedication and sustenance, and comprehension and extent of analysis, are important components if a country wants to exhibit political will for successful anti-corruption outcomes" (Ankamah & Khoda, 2018, p. 11).

"One can empirically quantify and measure the political will possessed over time by state actors in a specific country in relation to their challenging and reducing organised crime. The methodology evaluates the actual performance year-over-year of a state's institutions, agencies and regulatory bodies with regard to water and electrical utilities, tax administration and land management—three sectors that affect the everyday life of each and every citizen, for which there are known means of assessing efficiency, and whose efficiency is correlated to the overall level of organised crime in that country. Increased efficiency of each of the three is a direct measure of the state's political will to reduce the malevolence of organised crime."

Scheye, 2020, p. 14

Heather Marquette's intellectual contributions are also important and currently dominate the literature on political will (Marquette & Peiffer, 2018; Marquette & Pfeiffer, 2019; Pfeiffer, Armytage, Marquette & Gumisiriza, 2020; Marquette, 2022). She argues that political will has been a "black box" concept—and that there are risks to such an approach.

Scheye (2020) presents five indicators that address the quandary of intent by offering observable and measurable indicators including 1) Disbursement of requested and allocated budgetary funds; 2) Implementation of laws, rules, and regulations; 3) Analytic analysis and understanding of the problem that is to be solved; 4) Application of incentives and disincentives for decisionmakers, policymakers, and implementing officials; and 5) Coalition building.

ANNEX IV: SOURCE MATRIX: ANTI-CORRUPTION INTERVENTIONS

Work database (Excel format) available here:

https://www.dropbox.com/s/13brz23v2utyca4/3_25%20All%20Excel%20PW%20Bibliographies_%20Final%20Report.xlsx?dl=0

ANNEX V: EVALUATION OF EXISTING ANTI-CORRUPTION INTERVENTIONS IN LOW POLITICAL-WILL SETTINGS: DETAILED ANALYSIS

This annex contains the detailed analysis that formed the basis of the innovation scorecard presented in Section II. Note: Despite the promise and generally favorable reputations of these approaches, upon closer analysis, not all were deemed suitable for application in low political-will contexts. One four of the ten chosen were selected for further evaluation:

1) E-governance reforms (Vietnam)
2) Transparency initiatives (Mozambique)
3) Procurement reforms (Ukraine)
4) Social accountability (Peru)

1. SUPPORT INDEPENDENT ANTI-CORRUPTION AUTHORITIES (ACA)

A traditional solution to the problem of pervasive corruption is to centralize key capacities and resources under one agency, removing the primary responsibilities of anti-corruption from pre-existing judicial and administrative agencies. These newly empowered anti-corruption authorities, often abbreviated as ACAs, are "often regarded by governments, donors, and international governmental organizations (IGOs) as the ultimate institutional response to corruption" (de Sousa, 2009, p. 1).

Reformers typically design ACAs as elite agencies, working hard to shield them from pre-existing norms and cultures of corruption within the government. They are meant to be insulated from political and bureaucratic interference and given broad powers to target the networks of corrupt officials and citizens. Hiring practices must be aligned with a culture of integrity, and high salaries and benefits help to ensure that they do not take bribes themselves (Fisman & Golden, 2017).

Despite commonalities across different contexts, ACAs can take on many forms. Some are "multi-purpose" or "universal," combining investigative, preventative, and educational functions under one roof. Others are strictly law enforcement agencies, tasked with policing corruption and given prosecutorial discretion, while some are tasked with preventing corruption through monitoring and publicizing corrupt practices without police powers (OECD, 2013). Kuris (2015) compares these two types of ACAs to "guard dogs" and "watchdogs," noting that both still exist along a continuum of coercive powers granted to these agencies. Many ACAs sit in the executive branch, but parliamentary committees, such as the New South Wales Independent Commission Against Corruption, can also utilize legislative powers, such as subpoenas to target corruption through investigations and publication of critical information. It may not even be true that one centralized ACA operates by itself, but rather that multiple agencies are empowered to act in concert, such as when the United States Office of

Government Ethics partners with the Department of Justice to investigate and prosecute corrupt acts (Heilbrunn, 2004).

Much of the existing scholarship on the effectiveness of ACAs exists in case studies and qualitative analyses. This owes to the difficulty posed by comparing ACAs across different institutional and cultural contexts (Doig, Watt, & Williams, 2006; Kuris, 2015). The scholarship on ACAs has remained remarkably consistent over the years. Early successes in Hong Kong and Singapore (Quah, 2007; Choi, 2009) have not been replicated, and in fact, using those two examples to set expectations for success in different contexts may even lead to failure as local context is set aside for the adoption of an "ideal" ACA model (Meagher, 2005; Doig, Watt, & Williams, 2005). The only recent quantitative study shows that the introduction of an ACA does not appear to reduce the overall corruption levels in a country (Mungiu-Pippidi & Dadasov, 2017), but cross-national studies suffer from problems of comparability. ACAs are allotted different levels of resources and capacities, so strict quantitative comparisons remain elusive. Additionally, it remains difficult to fully trace the causal links between specific interventions by ACAs and reductions in corruption (David-Barret et al., 2020).

For ACAs to succeed, then, necessary conditions must be met. Quah (2007) emphasizes six conditions, particularly emphasizing strong internal norms against corruption, independence, adequate resources, and continued political support. Johnston and Fritzen (2020) lay out four conditions: 1) sufficient power, 2) internal integrity and external independence, 3) integration with other actors in the criminal justice system, and 4) long-term expansion of operations to tackle larger structural problems. Gemperle (2018) particularly emphasizes public accountability, including "regular reporting, expenditure disclosure, and complaint systems or public hearings" (60). The commonly held distinction between "guard dog" and "watchdog" agencies may be less important than internal cohesion, political autonomy, and broader support coalitions. Ultimately, agencies that lack law enforcement power can still improve corruption outcomes if it remains internally coherent with a clear political mandate and support from critical stakeholders (Kuris, 2015).

Together, political autonomy and independence remain commonly cited as necessary conditions for the success of ACAs. Where these conditions do not hold, political leaders opposed to reform may undermine the agency's progress against corruption. Indonesia's Corruption Eradication Commission, or KPK, was previously seen as a critical success, with strong public support and several high-profile convictions and recoveries of stolen assets (Choi, 2011; Schütte, 2012). However, in recent years, political interference led to the passage of a new law reducing the independence of the KPK and the dismissals of high-profile anti-corruption officials (IACC Monitor, 2020; Transparency International, 2021). While ACAs can be effective in establishing systemic preventative activities without the need for legal investigations and prosecution (Kuris, 2014), the example of Indonesia shows that ACAs usually win or lose based on the political support of top officials. When an ACA is formed in a high-corruption context, and by leaders who have no intention of pursuing strong anti-corruption interventions, then that ACA is far more likely to be "toothless."

2. SUPPORT REGULARIZED GOVERNMENT AUDITS

As corruption consists of numerous illicit exchanges, officials fear being detected when engaging in corruption. Regularized audit procedures, then, by increasing the probability of detection, should lead to a decrease in corruption by detecting and removing corrupt officials, as well as deterring future corrupt behavior by other officials. This occurs due to different channels of accountability: electoral, judicial, and

bureaucratic chains of authority can lead to sanctions for observed corruption. These "top-down" audits[13] are typically aimed at lower-level bureaucrats and local-level political leaders, with many centering on municipal administrations, bureaucratic agencies, and their leaders.

Unlike the scholarship on ACAs, many rigorous quantitative studies have shown that government audits significantly reduce the incidence of corruption, at least in the short run. An analysis of an auditing program targeting public hospitals in Buenos Aires in 1996 and 1997 shows that the cost of basic medical supplies fell by 15 percent during the crackdown, even remaining below pre-crackdown levels following the end of the program (Di Tella & Schargrodsky, 2003). In the mid-1990s, the Mani Pulite campaign in Italy, a nationwide crackdown led by judges with "clean hands," broke the previously strong relationship between infrastructure spending and corruption that had plagued Italy politics for decades (Acconcia & Cantabene, 2008).

Researchers have even partnered with governments to conduct field experiments on the effectiveness of government audits. One such experiment, conducted in Indonesian villages, compared the effectiveness of external government audits to internal monitoring by villagers, finding that villages randomly assigned to receive the threat of an audit saw an eight-percentage point decrease in the "missing expenditures" endemic to village road projects (Olken, 2007). Another experiment, conducted with the Brazilian federal government's audit agency, showed that increasing the probability of a municipal audit from 5 to 25 percent leads to a 15-percentage point drop in the proportion of corrupt procurement processes (Zamboni & Litschig, 2018).

Brazil's municipal audit program has been well-studied and remains a remarkable example of a well-designed audit system. The agency conducting audits remains shielded from political interference, and conducts randomized and unannounced audits to capture municipal corruption more accurately (Ferraz & Finan, 2011; Power & Taylor, 2011; Speck, 2011). These random audits have even been shown to have spillover effects into neighboring municipalities, with corruption in health reduced by over five percent in bordering municipalities (Lichand et al., 2016).

What, then, determines the success of a particular audit program? First, the officials audited must face credible sanctions for observed corruption: "Increasing the likelihood of an audit alone is not sufficient to deter rent-taking if potential sanctions and the probability of sanction conditional on detection are too low" (Zamboni & Litschig, 2018, p. 148). Officials face different types of sanctions, depending on the accountability networks they are embedded in. Elected officials, such as mayors, often face electoral sanctions as their corruption is publicized in audit reports. In Brazil, audits conducted before the 2004 elections significantly weakened incumbent mayors' re-election prospects and improved the odds for non-corrupt governors, with local media such as radio amplifying the spread of information from audit reports (Ferraz & Finan, 2008). Further studies show that the power of these electoral sanctions does vary. For example, term-limited officials are much less likely to face real electoral sanctions (Ferraz & Finan, 2011). Additionally, while fear of losing office may discipline corrupt officials before elections, these decreases have been found to be quite short-term (Bobonis et al., 2016).

Judicial sanctions also play a role in audits reducing corruption: Brazilian audits have been found to increase the likelihood of legal sanctions by 20 percent (Avis et al., 2018). Finally, sanctions can be

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[13] We adopt this nomenclature to differentiate government audits from "bottom-up" audits conducted by citizens and civil society groups.

implemented through the bureaucracy. A randomized monitoring program implemented in Indian rural hospitals[14] reduced absenteeism by nurses when strictly enforced with docked pay and firings. While there initially was a steep drop in nurse absenteeism, after the first six months, the local government eliminated the sanctions on absentee nurses leading to a return to pre-audit levels of absenteeism (Banerjee et al., 2008). To serve as effective anti-corruption tools, audits, and government monitoring programs, in general, must be paired with credible sanctions.

Critically, the audit agency must also have strong political buy-in, so they can operate independently and with sufficient resources. Independence is especially critical, as it "must have the authority to do its job without the threat of retaliation and the power to proceed with its plans" (Dye & Stapenhurst, 1998). Those agencies without independence from political interference cannot effectively contribute to anti-corruption efforts (Santiso, 2006; Melo et al., 2009; Gustavson & Sundström, 2018). The International Organization of Supreme Audit Institutions (INTOSAI) published guidelines for audit agencies, emphasizing independence and adequate funding and staffing (INTOSAI, 1998). Setting up regularized funding appropriations minimizes the threat of political interference and ensures adequate resources for audits (Clark et al., 2007). Audits, then, require some initial buy-in from top politicians, both in setting up independent and well-funded institutions and in pursuing sanctions against observed corruption.

3. RAISE BUREAUCRATIC SALARIES

One important debate in anti-corruption studies focuses on the role of extrinsic motivation for bureaucrats, primarily emphasizing wages. In this debate, proponents for increased salaries argue that poorly paid civil servants turn to corruption for additional income. Increasing wages, under this argument, should lead to a substitution away from criminal activities and incentivize "fair" work by bureaucrats.

However, scholarship has generally not supported this proposition. Early cross-national studies showed a modest relationship between bureaucratic wages and national-level perceptions of corruption (Van Rijckeghem & Weder, 2001), but more robust analyses that better account for confounding factors find no strong evidence in favor of this thesis (Treisman, 2007; Dahlström et al., 2012). When shifting to country cases, evidence remains mixed. Using detailed household data, Gorodnichenko and Peter (2007) find that while Ukrainian public sector employees receive significantly lower wages than their private sector counterparts, they share similar levels of consumption and asset holdings, indicating a source of illicit income for those civil servants. Lindkvist (2013) studies health workers in Tanzania, showing that higher wages are associated with a lower propensity to accept bribes.

Quantitative studies with stronger research designs continue to raise questions about the wage-corruption nexus. Following the unexpected 25-percent cut in public school teacher wages in Romania, Borcan et al. (2014) find, somewhat surprisingly, that exam scores for public school students increased relative to their counterparts at private schools. They argue that this indicates efforts by teachers to solicit bribes following the wage cut. While this study examines a wage decrease, Foltz and Opoku-Agyemang (2015) conduct a study of a recent wage increase for Ghanaian police officers. Comparing their subsequent behavior to their counterparts in Burkina Faso, where wages remained the same, the

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[14] This monitoring program was conducted by a partnership between Seva Mandir, an NGO, and the government of the Udaipur District in the State of Rajasthan. Seva Mandir provided timeclocks to monitor attendance and passed along this information to the government, who enforced violations by wage reductions and firings.

authors discover that the total bribe revenue solicited by Ghanaian police increased after the wage hike. Finally, a large-scale randomized field experiment conducted in Pakistan with tax collectors indicates some support for pay-for-performance schemes. Linking pay to collection levels pushed collectors to accurately assess high-value properties, although property owners did report an uptick in bribes to avoid payment (Khan et al., 2016).

It may be that wage increases on their own will not reduce corruption. Many studies have pointed to the need to pair higher wages with more effective audits and monitoring systems (Di Tella & Schargrodsky, 2003; Fjeldstad, 2003; Schueth, 2012). As such, the necessary conditions to translate wage increases into reduced corruption mirror those of government audits. There must be concerted efforts following the wage increases to push for reduced corruption. Otherwise, there are likely to be few results for the increased expenditures on the part of the government.

4. PROMOTE THE RIGHT TO INFORMATION

Transparency is closely linked to popular notions of anti-corruption. Gathering information on acts of corruption is often the first step in any larger anti-corruption effort, and so enhancing transparency can increase the effectiveness of other interventions. Unlike the previous interventions listed above, transparency initiatives can also be undertaken by civil society actors, such as NGOs, journalists, and ordinary citizens. These range from strengthening investigative journalism to information campaigns targeting citizens with data on corrupt practices by local officials.

Many studies have emphasized the importance of robust journalism in combatting corruption. Cross-national analyses consistently highlight the link between freedom of the press and lower levels of corruption (Brunetti & Weder, 2003; Treisman, 2007; Flavin & Montgomery, 2020). Country studies consistently emphasize the key role played by the media in uncovering corruption scandals and mobilizing popular support for change (Stanig, 2015; Francken et al., 2009; Kim, 2021). Ferraz and Finan (2008) and Avis et al. (2018) both find that local media strength is key in linking Brazilian municipal audits to the application of penalties against corrupt mayors.

Other transparency initiatives likewise contribute to anti-corruption efforts. Reinikka and Svensson (2005) document the results of the Ugandan government publicizing "leakages" in government education grants in local newspapers, finding that greater exposure to this information led to more funds reaching the school. Voter information campaigns in both rural and urban India, where information about politicians' corruption was disseminated in a randomized experiment, have been linked to higher turnout and election of higher-quality candidates (Banerjee et al., 2011; Banerjee et al., 2014). Similar information campaigns in Mexico released publicly available, but rarely utilized, audit reports from the federal government to voters in several districts prior to the 2009 municipal elections. Information about corruption harmed the incumbent party by turning potential voters away from the polls (Chong et al., 2010). These types of transparency initiatives help put public pressure on officials, including through potential loss of office, thereby raising the costs of engaging in corruption.

Right-to-information laws also play a large role in promoting transparency. As of 2019, 120 countries have rights to information (RTI) or freedom of information (FOI) laws (Transparency International, 2019). These provide a legal framework for citizens to request information on government operations, lowering monitoring costs and making it easier to spot corruption. Quantitative scholarship on the effects of these laws remains limited. Peisakhin and Pinto (2010) use a randomized experiment in India

to show that FOI laws do indeed improve access to basic services usually available only through corruption. Applicants who submitted an FOI request after their application for benefits were far more likely to receive their benefits than those who did not. The Indian RTI law is an excellent case, having succeeded in exposing corruption (Agrawal, 2012; Mathur, 2012). However, the adoption of FOI laws can have negative short-term effects, as perceptions of corruption increase due to easier access to information (Costa, 2013; Escaleras et al., 2010), but this effect is largely temporary, as the long-term effects of increased transparency help to reduce overall corruption (Cordis & Warren, 2014). "Open data" initiatives have been likewise found to improve transparency and lower corruption (Granickas, 2014; Stromseth et al., 2017).

Interventions that promote transparency can originate in government, in civil society, or because of coordination between public and private actors. A variety of transparency initiatives have been shown to bear fruit, and those which are pushed forward by civil society actors can be implemented in contexts where political leaders remain hostile to anti-corruption reforms in government. However, transparency initiatives may also have unintended effects on the overall corruption environment. It may push corruption by officials into less open sectors, as Seim (2014) finds evidence for in Malawi, and therefore lead to a sense of false victory among reformers. On the other hand, Phan (2016) finds that transparency initiatives in high-corruption environments may cause officials to engage in more corruption as they adjust to new information. As with other successful tools, transparency initiatives will only reduce corruption when paired with a good understanding of the local context and alongside a broader push for anti-corruption reform.

5. IMPROVE FINANCIAL DISCLOSURES

Another important tool in promoting the accountability of government officials is financial disclosures. By forcing officials to disclose their income, consumption habits, assets, or business holdings, disclosures can aid in suppressing two types of corruption: bribe-taking and self-enrichment. To prevent bribe-taking, laws typically emphasize disclosure of income, assets, and consumption, to highlight any gaps between official income and expenses. Meanwhile, disclosing business connections helps to prevent conflicts of interest and self-dealing when drafting and implementing new legislation and regulations (Djankov et al., 2010). As of 2017, 161 countries have adopted some form of financial disclosures for government officials (Rossi et al., 2017).

Studies on the effects of financial disclosure on corruption show an unambiguous dampening effect on corruption. Djankov et al. (2010) run a cross-national analysis of financial disclosure laws for Members of Parliament (MPs) across 175 countries and find that countries with standards of public disclosure tend to have lower levels of corruption. Vargas and Schultz (2016) draw on disclosure data from the World Bank Public Accountability Initiative to suggest that raising standards for disclosure should lead to reductions in overall corruption. Fisman, Sculz, and Vigman (2019) conduct a quasi-experimental study of the passage of asset disclosure laws in Indian state governments and subsequent behavior by state legislators. They find that the passage of asset disclosure laws leads to a significant increase in incumbent legislators retiring, arguing that this represents more corrupt politicians choosing to leave office.

Public disclosure systems remain hotly debated, as implementation seeks to balance privacy for officials with concerns about corruption and self-dealing. Under full disclosure regimes, all information provided in the declaration is made available to the public, increasingly through Internet databases. More limited disclosure regimes make certain information off-limits to the public, such as in Portugal, where courts

can limit public access to asset declarations upon request, or in Macedonia, where certain classes of civil servants do not publicly disclose assets (OECD, 2011). Indeed, one of the greatest barriers to disclosure regimes is privacy concerns, and these vary widely across nations and cultures (Messick, 2009).

Electronic filing of asset disclosures has become increasingly common. Pre-Invasion Ukraine is a noteworthy example, implementing a new electronic web-based system after the passage of the Law on Corruption Prevention. Covering about 1 million public sector employees in Ukraine, the system contained over 3.7 million documents as of March 2019, all of them publicly available on a web platform as soon as the declaration is filed. The system also conducts automatic verification of submitted data, flagging inconsistencies and missing information for follow-up by investigators (Kotlyar & Pop, 2019). The Ukrainian model currently represents the vanguard of public asset disclosure.

Many argue that because political action is needed to establish asset disclosure systems, therefore top leaders must provide political buy-in (Chêne, 2008). However, there are many high-corruption contexts where systems of asset disclosure are developed and implemented. Schnell (2018), in her study of Romania's experience with a series of transparency initiatives, makes the argument that many politicians adopt these policies as signals, but miscalculate the long-term consequences of their actions. In doing so, effective anti-corruption policies, such as asset disclosures, can be achieved in high-corruption contexts despite political opposition to reform.

6. REFORM PROCUREMENT PROCESSES

Public procurement, which can be notoriously opaque for monitors, is particularly vulnerable to corruption (Olken, 2007; Collier et al., 2016; Lichand & Fernandes, 2019; Colonnelli & Prem, 2020). Procurement is one of the primary channels of government spending, encompassing up to 50 percent of government budgets in developing countries (World Bank 2016), and as such, procurement is a ripe environment for corruption and graft. Procurement reforms focus primarily on improving transparency and public accountability, opening the system to scrutiny by contractors and the public alike.

"E-procurement," the digitalization of public procurement systems, has long been advocated as a primary solution (OECD, 2016; OECD, 2019; Ware et al., 2007). By replacing paper-based procedures, e-procurement can "mitigate corruption by reducing government officials' ability to selectively withhold information or refuse electronic bids from non-favored bidders" (Lewis-Faupel et al., 2016). E-procurement should allow firms to avoid bribes paid out to secure contracts (Knack et al., 2017) and allow for public scrutiny of the procurement process. Overall, it shares similar benefits to adopting broader e-governance reforms (below), reducing bureaucratic discretion (below), and enhancing overall transparency and accountability.

Several country examples are often cited to advocate for the adoption of e-procurement. South Korea became an early success story, launching an e-procurement system in 2002 that reduced red tape surrounding most procurement contracts, which in turn limited opportunities for corruption. Several factors were noted in explaining success, including widespread governmental support, pre-existing capacities for information technologies, and collaboration across government agencies (Seong et al., 2004; OECD, 2016). A more recent case concerns the Prozorro system in Ukraine, adopted in the aftermath of the 2014 Euromaidan Revolution and as part of a broad push against corruption. Originally developed and run by a civil society organization, it developed independent legitimacy among key stakeholders before it was transferred to state control. The reforms ensured that information was now

available for small procurements, that bids would be more competitive with more transparent pricing, and most importantly, that all of this information would be stored in a central database available for public consumption (Nizhnikau, 2022). Several studies have shown it to have significant improvements to the number of bids, savings, and procurement times (Shapoval et al., 2017; Kovalchuk et al., 2019).

More rigorous quantitative studies on e-procurement remain quite limited, and the existing studies have generated inconclusive results. Ghossein et al. (2018), in their analysis of firm-level data spanning more than 100 countries, finds that countries with better public procurement, including online bidding systems, tend to have fewer firms reporting payment of bribes. However, another cross-national study by Kochanova et al. (2020) shows that adopting e-procurement seems to not affect the likelihood of firms using bribes to secure contracts. Lewis-Faupel et al. (2016) exploit the gradual roll-out of e-procurement systems at the subnational level in India and Indonesia to quantify the benefits and costs of adoption. They find that while prices do not decrease, there are significant improvements in quality, indicating that new contractors are better able to break pre-existing relationships between "preferred" vendors and officials that are often dominated by corruption.

Overall, e-procurement adoption remains a key part of public procurement reforms, even with limited rigorous quantitative evidence to support these claims. Previous scholarship heavily emphasizes the importance of political support, not just from within government but across civil society, as well as the technological capabilities for proper utilization.

7. IMPROVE SOCIAL ACCOUNTABILITY

Social accountability rose out of the 1950s as consumers and citizens demanded that corporations account for broader social impacts. Starting in the 1980s, tools like the social audit expanded into the public sector, aimed especially at improving outcomes under democratic governance (Berthin, 2011; Farag, 2018). These tools aim to empower citizens and civil society to scrutinize the actions of public officials and then apply pressure to ensure more positive outcomes, such as reduced corruption. Broadly speaking, these forms of "bottom-up" monitoring are driven by NGOs, who recruit and coordinate citizens to participate in the monitoring process (Farag, 2018). Social accountability interventions all rest upon the notion that governments are broadly accountable to citizens, whether directly or indirectly (Berthin, 2011; Fox, 2015).

Studies of "bottom-up" monitoring highlight a few key factors for success. Randomized field experiments in community monitoring present mixed findings. Several studies of community monitoring in Uganda find that when village communities are encouraged to monitor health service provision more closely, treatment communities have both higher community involvement and better health outcomes (Björkman & Svensson, 2009; Björkman-Nyqvist et al., 2014). On the other hand, Olken (2007), in experiments in Indonesian villages, finds no effect of community monitoring on corruption in village road projects. Other studies show that social audits and community monitoring can work in the right context. Social audits in Guatemala, Peru, and Ghana have demonstrated that social audits are potentially powerful, but careful consideration of the political environment is necessary at all stages of implementation (Farag, 2018).

The social audit movement in India remains the most widely studied. It originated in the 1990s in the western state of Rajasthan during a grassroots campaign to reduce corruption and enforce proper wages from public works programs. Out of this arose the *jan sunwais* (public hearings) spaces where citizens

could collectively interrogate state programs with reduced fear of coercion (Pande, 2021). These social audits have been found to have positive impacts, reducing wage theft (Shankar, 2010) and corruption by local officials (Berthin, 2011). However, progress has been uneven, spurring a nationwide roll-out and demonstrating a need to further develop state capacity to properly incorporate social audit programs into the governmental system (Pande, 2021).

Social accountability mechanisms are often seen as necessary but not sufficient. These interventions should, ideally, activate accountability mechanisms within the government, one being between officials and their superiors, and then sustain this through continued sanctions, usually through the electoral system (Schatz, 2013; Fox, 2015). Rather than viewing social accountability as an end unto itself, interventions should ideally bolster the overall political environment in favor of further anti-corruption reforms. Those interventions that have been the most successful begin virtuous circles that build enabling environments for citizens to continue acting, which then may trigger broader reforms (Fox, 2015). As always, local context remains critical. Steps must be taken to assess the potential for collective action, to determine what citizens believe should be the goal, and to find trusted local partners (Camargo, 2018).

8. ADOPT E-GOVERNANCE

E-governance reforms are expected to reduce corruption through multiple channels. By reducing interactions between individual bureaucrats and citizens, it shrinks the window through which officials can extort bribes. It speeds up decision-making and reduces the number of points at which officials need to give their approval. Finally, it opens information and policy processes to the public, increasing transparency and accountability.

Numerous cross-national studies have indeed found a relationship between the level of e-governance and corruption levels (Andersen, 2009; Mistry & Jalal, 2012; Nam, 2018; Elbahnasawy, 2014; Martins et al., 2018). However, these studies remain limited in their explanatory power due to the use of ambiguous and poorly defined measures and the difficulty in implementing strong empirical designs in cross-national studies that allow for the identification of the counterfactual or what would have happened in the absence of the reforms. Additionally, as e-governance reforms may have many effects on corruption, some potentially countervailing, it is difficult to trace out the pathways to corruption reduction through cross-national studies. Turning to case studies and more rigorous empirical works, we find more support for e-governance as an anti-corruption tool, especially when applied to address specific problems.

There is a growing set of rigorous empirical studies on e-governance. Muralidharan et al. (2016) worked with the government of the Indian state of Andhra Pradesh to randomize the implementation of new biometric smartcards across sub-districts and then evaluated the program to analyze various outcomes, notably embezzlement of funds from two large welfare programs. They find that this new e-governance system noticeably reduced corruption in these welfare programs by moving the point of payment closer to the recipients and preventing fraud through biometric authentication. Banerjee et al. (2014) conducted another field experiment in India, evaluating an e-governance reform to the workfare program in the state of Bihar that both increased transparency and cut down on the number of administrative tiers involved in the process. They find that this reform decreased financial outlays with no change in participant earnings, indicating that it instead decreased fraud and leakage due to corruption. Finally, Okunogbe and Pouliquen (2022), in their study of small and medium enterprises in

Tajikistan, find that firms who utilize a new e-filing system for tax payments end up paying fewer bribes, especially among those firms previously less likely to evade tax officials.

Case studies illustrate potential pathways for success. One of the earliest examples of e-governance reforms, the OPEN system in South Korea, emphasized the necessity of broad political support for the project, both within the government and amongst the populace (Kim et al., 2009). A case study of the Check My School program in the Philippines, which collected educational data and then aggregated it on a publicly available online platform, shows the strength of joint initiatives between civil society and government and that considerable effort must be invested in implementing the technological components of reforms (Shkabatur, 2012). A preliminary study of Kazakhstan's e-government program indicates that it may help to reduce petty corruption in everyday interactions, but further reforms are necessary to expand these initial successes (Sheryazdanova & Butterfield, 2017). However, the potential for the co-optation of these new e-governance initiatives cannot be ignored, as pre-existing corruption networks may simply re-adjust to the new equilibrium (Addo & Avgerou, 2020; ReSPA, 2013). Overall, however, empirical evidence remains in favor of e-governance as a tool for reducing corruption. Its potential for enhancing transparency, accountability, and bureaucratic efficiency outweighs potential costs, especially when it is paired with strong civil society buy-in.

9. STREAMLINE REGULATIONS

Excessive regulatory regimes can be breeding grounds for corruption. At each point of interaction between citizens and civil servants exists the opportunity for bribes, driving up the total cost of bribery and pushing many to exit the formal economy altogether (De Soto, 1989; Acemoglu & Verdier, 2000; Djankov et al., 2002). Reducing regulatory burdens, then, in favor of a more streamlined process is often suggested as a method of anti-corruption reform. These policies can take a range of forms, from more transparent pricing in public services to cut down on the number of steps in permitting or tax collection.

Evidence heavily supports the notion that excessive and undue regulations create or contribute to corruption. In many countries, firms primarily pay bribes in response to regulatory burdens, such as fees for licenses and levies. For example, Indonesian localities depend heavily on "indirect" revenues in the form of bribes due to low allocations of funding (Henderson & Kuncoro, 2004). A pilot study of a streamlined regulation system in Uganda found that simplifying the licensing process for businesses greatly reduced opportunities for corruption, in addition to bringing in more revenue and improving compliance (Sander, 2003). Studies of tax reforms in Indonesia (Toye & Morre, 1998) and Georgia (Schueth, 2012) likewise suggest that the simplification of regulations, in these cases taxation, reduced corruption.

Further empirical evidence, in the form of cross-national analyses, provides further evidence in support of regulatory reforms as a means of combatting corruption. Ades and Di Tella (1997; 1999) show an association between perceived corruption and anti-monopoly and anti-protectionist policies. Djankov et al. (2002) find a link between higher regulations for business entry and higher levels of perceived corruption. However, as Treisman (2007) argues, the causal direction between the two may run the other way, and further in-depth study of regulatory reforms is required to map out the pathways to change.

In a related vein, the introduction of "one-stop shops" may also reduce corruption by decreasing the number of points at which start-up businesses need approval before they can open (Raad & Wright, 2012). They have been subsequently implemented in many developing countries, usually touted as a push

for bureaucratic efficiency in public service delivery (Sahebe et al., 2021; Onyango, 2017; Phan, 2016). However, one problem that they may face is that in some instances, the services that are most open to bribery, such as public education or healthcare, are not able to be located in the one-stop-shop (Turner, 2012). Additionally, if not implemented with local context in mind, it is more likely that these one-stop shops will simply be absorbed into the networks of corruption (Janenova & Kim, 2016). One excellent case of the one-stop shop is Vietnam, where scholars still debate their effectiveness in the line of anti-corruption (Blunt et al., 2017; Gueorguiev & Malesky, 2012).

In summary, regulatory reforms, while promising in several cases, remain largely untested by rigorous empirical studies. Additionally, it requires close cooperation by government officials in crafting and implementing the proposed reforms. This potential intervention, then, is ripe for case study research.

10. REDUCE BUREAUCRATIC DISCRETION

When they can interpret and selectively apply rules and regulations, bureaucrats may exploit this power to extort bribes (Klitgaard, 1988). Existing evidence remains favorable for a link between discretion and corruption. A case study of a "target-based responsibility system" in a Chinese county government highlights the role of discretion in promoting corruption and deterring superiors from active monitoring and punishment (Chan & Gao, 2008). A survey of 800 South Korean bureaucrats likewise showed that when they were presented with a hypothetical scenario of greater autonomy, they would be willing to engage in more corrupt behavior (Kwon, 2014). Finally, several studies using survey data of firms in post-communist countries suggest a link between discretion and the amount of bribes paid out by firms (Beazer, 2012; Duvanova, 2014). This evidence suggests that reducing bureaucratic discretion may be an effective tool to cut down on corruption.

As for empirical evidence, only a few high-quality studies exist. Using an Italian database of firms and officials investigated for corruption, Decarolis et al. (2020) find that while discretion was in some instances associated with corruption, it also led to greater efficiency. They advocate for a central monitor managing a trade-off between efficiency and corruption by limiting discretion only in high-corruption localities and procedures. Szucs (2021) exploits a Hungarian policy reform that allowed for greater discretion at lower contract values. As the threshold for discretion shifted, he finds that it has several noticeable effects: not only do prices for procurement rise, but bureaucrats end up selecting less productive contractors. Finally, he shows that this new allowance for "high discretion" tends to benefit firms that have political connections.

Reducing bureaucratic discretion may indeed decrease corruption, by cutting off opportunities for officials to extract bribes. However, evidence remains limited, and it requires a great amount of cooperation with government officials to craft and implement. Additionally, the potential for "slippage" between official regulations and actual implementation remains unless greater efforts are taken to monitor and punish those officials who break the rules.

ANNEX VI: SOURCE MATRIX: ANTI-CORRUPTION IN THE PROGRAM CYCLE

Work database (Excel format) available here:

https://www.dropbox.com/s/13brz23v2utyca4/3_25%20All%20Excel%20PW%20Bibliographies_%20Final%20Report.xlsx?dl=0

ANNEX VII: CASE STUDY OF E-GOVERNANCE IN VIETNAM

EXECUTIVE SUMMARY

Since Vietnam first initiated economic reforms in 1986, the country has been plagued by chronic corruption and excessive bribery at both central and local levels, leading to slowdowns in processing administrative procedures, bureaucratic hurdles to investment, and ultimately constrained private sector growth. Over the last few years, international media has focused on the Vietnam Communist Party's "Blazing Furnace" anti-corruption campaign of investigating and punishing elite officials. Less visible, however, have been the more impactful ongoing efforts to reduce corruption by removing opportunities for bribery through e-governance reforms. These efforts build on years of smaller, more technical initiatives, including the USAID-funded Provincial Competitiveness Index (PCI), which was launched in 2005 to measure improvements in business environment development on the provincial level. In short, before the emergence of *political will to address corruption* at the elite level, the PCI tapped into the *political will to create better environments* for Vietnamese small and medium-sized enterprises (SMEs) at the local level.

KEY THEMES

- The PCI as an objective source of data on the scale of corruption, its consequences, its relationship with burdensome inspections, and regulatory burdens.

- The spillover of the PCI revelations into prominent news publications infusing public debates with information on corruption and reform ideas.

- Business pressure to alleviate frustrations with bureaucratic processes and excessive bribery.

- E-governance reforms as a mechanism for streamlining procedures and reducing the discretion of local officials and bureaucrats, thereby reducing opportunities for corruption.

- Political will for anti-corruption reforms generated by demonstrating the connections between corruption and unsatisfactory business performance.

COUNTRY CONTEXT

Population: Vietnam's ninety-eight million human population is spread across sixty-three provinces and national-level cities. The two largest population centers are Hanoi, the capital city in the north with 8.3 million people, and Ho Chi Minh City, the southern economic center with 9.2 million people (General Statistics Office of Vietnam, 2022c).

Political System: The Vietnamese polity is best described as a single-party regime under the rule of the Vietnamese Communist (VCP) Party. Major economic decisions are made in the 162-member Central Committee, which meets two to three times a year. When the Central Committee is out of session, executive authority is vested in the 18-member Politburo, led by the Party General Secretary, who is considered first among equals. However, the Vietnamese system delegates significant authority over government activities to the Prime Minister, who leads the state apparatus, including central ministries and provincial governments (Schuler, 2021). The President also serves as head of state, and legislative

power is granted to the Vietnamese National Assembly. In addition, over the years, significant administrative and fiscal decentralization has taken place, giving a great deal of authority to provincial leaders over economic decisions at the local level (Anh, 2016).

Human Development: According to the UNDP, Vietnam ranked 115th of 191 countries on the Human Development Index in 2021. There is a great deal of variance between provinces and districts in development. Roughly 70 percent of tax revenue is produced by economic activity in only ten provinces and national cities (Vietnam Public Expenditure Review, 2017).

Economy: Due to economic liberalization, state-owned enterprise reform, and international integration, Vietnam has seen tremendous growth since the 1980s. There has been an average annual growth rate of six percent to seven percent for three decades. Vietnam was also one of the few economies to post positive economic growth during the COVID-19 crisis, achieving growth rates of 2.87 percent and 2.56 percent in 2020 and 2021, respectively (World Development Indicators | DataBank, 2022). In a very short time, the country has lifted millions out of poverty and achieved middle-income status with a GDP per capita of $3,800 USD. Services, particularly retail and food, and tourism account for about 41 percent of GDP. Industry and construction, particularly mining, manufacturing, and food processing, comprise 39 percent of GDP. The agriculture sector, historically Vietnam's largest source of income and labor, now accounts for less than 12 percent of GDP; however, it undergirds food security and is a source of exports (General Statistics Office of Vietnam, 2022b).

Private Enterprises: A key source of dynamism in the Vietnamese economy has been the Vietnamese non-state sector; however, it faces severe headwinds. Before the 2000 Enterprise Law, there were less than 150,000 formally registered private enterprises in the country. Today, there are over 660,000 spread throughout the country, a footprint that dwarfs the number of foreign investment enterprises (FIES) (with 22,242 operations) and state-owned enterprises (SOEs) (with 1,960 operations). However, on average, these private enterprises remain quite small, employing only 8.6 million people, about 58.5 percent of total business employment. By comparison, FIEs employ over five million people, accounting for 35 percent of business employment. After SOE reforms and equitization, SOEs now operate predominantly in capital-intensive sectors and, therefore, employ just over one million people (6.84 percent) (General Statistics Office of Vietnam, 2022a). Because of their small size and limited capacity, private enterprises have limited involvement in exporting. FIEs account for about 72 percent of the country's $281 billion USD in export revenue. Consequently, a key goal of Vietnamese leaders over the past decade has been to increase the size, productivity, and international potential of domestic Vietnamese firms (Le, 2020).

Blazing Furnace Campaign: Beginning with several corruption scandals in the early nineties, Vietnamese authorities embarked on a series of intermittent efforts to rein in corrupt activities, which culminated in the 2009 National Anti-corruption Strategy, the first formal articulation of Vietnam's efforts to combat corruption due to the threat they posed to the leadership's legitimacy (Malesky & Phan, 2019). The National Anti-corruption Strategy identified five groups of solutions to bribery and corruption in the country, including strengthening the transparency of official functions to reduce opportunities for corruption; improving the performance of civil servants; dramatically upgrading economic management to ensure a fair and equal environment for business; increasing inspections, auditing, and subsequent punishment of corruption; and enhancing societal awareness to prevent and combat corruption (Gainsborough et al., 2009). While ambitious, the national campaign had limited success. Both domestic

and international corruption evaluations continued to rank Vietnam as performing poorly, and most objective experts would have defined the leadership as lacking political will for anti-corruption efforts.

Between 2012 and 2016, anti-corruption efforts were reinvigorated by many high-level corruption scandals involving critically important SOEs and implicated several high-ranking officials. After former Prime Minister Nguyễn Tấn Dũng left office and General Secretary Nguyễn Phú Trọng was able to consolidate power in 2017, he initiated a renewed effort to root out corruption at its source (Hung, 2018). While the campaign began four years prior, Trong coined the term "blazing furnace" in a speech at the 2021 Party Congress, where he lamented the impact of corruption in holding back economic growth and vowed to punish the officials involved (Nguyễn, 2021). He has been true to his word. In the first six months of 2022, 295 party members were disciplined for corrupt activities, and there are an additional 297 ongoing cases against 682 members for bribery (How Vietnam's Anti-Corruption Fight Keeps Expanding - The Washington Post, n.d.). Some of these have made national headlines, including two high-flying Deputy Prime Ministers and President Nguyễn Xuân Phúc, who was officially dismissed from office for wrong-doings and violations by officials under his management.

Two other components of the blazing furnace efforts have been less attention-grabbing but equally important. First, Trong led a rewriting of VCP statutes to reduce malfeasance by limiting the permissible types of financial and business. Second, the Government pushed forward a series of e-governance reforms that have moved several public procedures and services online to streamline them and reduce opportunities for discretion by bureaucrats.

SECTORAL PROBLEM AND THE POLICY CONTEXT

CONSTRAINTS TO VIETNAMESE PRIVATE SECTOR GROWTH

Small and medium enterprises (SMEs) are an important part of the Vietnamese economy. Since the advent of the 2000 Enterprise Law, the share of private, domestic investment in total business activity has grown rapidly, now accounting for 39 percent of fixed capital investment in the country. There has also been a dramatic growth in the number of private firms, from 150,000 before 2000 to 670,000 active formal private firms in 2021 (General Statistics Office of Vietnam, 2022a). Despite their increasing role, one of the most critical development challenges in Vietnam today is the inability of SMEs to develop the productivity and scale needed to compete at home and in international markets. These private SMEs demonstrate limited capacity and low competitiveness in all sectors of the economy. Most Vietnamese private companies remain quite small—48 percent employ less than ten people, while 90 percent employ less than 50. In addition, more than 42 percent and 85 percent recorded annual revenues of less than one and two billion VND, respectively (Malesky et al., 2022). The small scale inhibits SMEs' ability to benefit from global integration, as only 11 percent of private firms export to international markets, and only six percent supply to foreign firms in Vietnam—both of these numbers are very low compared to Vietnam's Southeast Asian neighbors. SMEs instead focus their energies inward, with the vast majority catering to the domestic market and state procurement activities. The two most popular sectors for recent private sector entrants are wholesale and retail trade (32 percent) and real estate (17 percent). Most SMEs in Vietnam operate in the service sector, with only 20 percent producing goods (Malesky et al., 2018).

Previous work has attempted to address these dilemmas of inability to grow, limited capacity, and low internationalization among Vietnamese SMEs (T. V. Nguyễn et al., 2013). Most researchers agree that the key constraints are burdensome regulations, cumbersome inspections, lack of transparency in governance, and access to land and finance. These priorities were reflected in the Law on Support for Small- and Medium-Sized Enterprises (SME Law) that the Vietnam National Assembly passed on June 12, 2017.

CORRUPTION IN ECONOMIC GOVERNANCE AS A BARRIER TO PRIVATE SECTOR GROWTH

These regulatory burdens are associated with greater corruption in the private sector. Vietnamese businesses are expected to pay facilitation bribes during business registration, license acquisition, land procedures, and regulatory inspections. When these are not paid, regulators have had the discretion to hold up operations and damage business performance. Phạm Thành Nga, one of our anti-corruption champions, described the environment for private businesses in Vietnam as consisting of "a weak legal infrastructure, financial unpredictability, and conflicting and negative bureaucratic decision making" (Nga, 2020). Consequently, SMEs have traditionally had to shoulder a disproportionate corruption burden. In 2018, more than 50 percent of Vietnamese SMEs reported having to pay informal fees in all areas of operations, compared to only 30 percent of foreign firms. These informal payments can account for more than ten percent of SMEs' total revenues (Financial Magazine, 2019).

THE ROLE OF USAID'S PROVINCIAL COMPETITIVENESS INDEX (PCI) IN DOCUMENTING REGULATORY BARRIERS TO PRIVATE SECTOR DEVELOPMENT

The PCI was developed in 2005 by The Asia Foundation and the Vietnam Chamber of Commerce and Industry (VCCI) to measure the economic governance of Vietnam's provinces. The effort was funded by USAID under the Vietnam Competitiveness Initiative (VNCI), which was led by Development Alternatives Incorporated. A critical transition occurred in 2014 as part of the US-AID Forward program, which aims to enhance development by engaging directly with local partners. As part of this initiative, US-AID chose not to rely on an American contractor but instead assigned control of the entire PCI to the VCCI Legal Department.

The main impetus for the PCI research endeavor in 2005 was the wide variance in private sector performance and legal implementation across provinces. While international experts praised the emerging quality of Vietnamese business law at the national level (Waller & Cao, 1996), it became immediately apparent that the implementation of these laws relied heavily on the capacity and ingenuity of local provincial officials. In addition to variation in implementation, provinces were quickly moving apart due to de facto decentralization. Gaps between formal legislation and implementing documents, and contradictions between legislation crafted in different national institutions (i.e., the Enterprise Law and Land Law), were creating opportunities for some innovative leaders to push forward their own policy initiatives in favor of private sector development (Jandl, 2013; Malesky, 2008). The main goal of the PCI was to identify high-achieving provinces so they could be studied and their best practices transmitted to national leaders and other provincial authorities. The PCI was widely appreciated by local authorities and quickly expanded into an annual ranking of all 63 provinces based on over 10,000 respondents to its nationally representative survey. In 2010, an additional survey was added for foreign direct investors.

The overall PCI index score comprises ten subindices. A province that is considered as performing well on the PCI has 1) low entry costs for business start-ups; 2) easy access to land and security of business

premises; 3) a transparent business environment and equitable business information; 4) minimal informal charges; 5) limited time requirements for bureaucratic procedures and inspections; 6) minimal crowding out of private activity from policy biases toward state, foreign, or connected firms; 7) proactive and creative provincial leadership in solving problems for enterprises; 8) high-quality business support services; 9) sound labor training policies; and 10) fair and effective legal procedures for dispute resolution and maintaining law and order.

Over the years, the PCI has grown in its influence from being a purely methodological exercise to becoming critical in policymaking and evaluating the ease of conducting business, including levels of corruption. Implementation of the PCI has fostered competition between provinces and led to changes that foster growth and greater levels of transparent policies. In particular, the PCI made transparent the glaring gaps in business competitiveness and investment, and public pressure stirred by public reporting of its findings was a driving force behind the Government's commitment to combat corruption and implement digital governance. PCI findings have found their way into academic publications, donor reports, and the media.

To put the political visibility of the PCI in sharper relief, Table 8 records Vietnamese newspaper citations of the PCI from 2004, the year before the PCI, to 2016, the year the blazing furnace campaign started. To measure the relevance of the PCI (*Chỉ số Năng lực cạnh tranh cấp tỉnh*), we compare it to 1) "*chất vấn Quốc hội*," the official name of the biannual query session in the Vietnamese National Assembly, where delegates grill national ministers; and 2) "*Ban Chấp hành Trung ương Đảng Cộng sản Việt Nam,*" the official name of the Central Committee (CCOM), the powerful legislature of the VCP. We searched for the three Vietnamese terms in news stories in Vietnam's *Tuổi Trẻ* (Youth) newspaper and *Báo Mới* (New Paper), an online news aggregator for Vietnamese newspapers. The table shows that the PCI gathered as much attention as formal political institutions during these critical dates.

Table 8.   Number of Articles Found on Online Search Engines

	PCI	VNA QUERY SESSION	CENTRAL COMMITTEE
News Aggregator	Chỉ số Năng lực cạnh tranh cấp tỉnh	Chất vấn Quốc hội	Ban Chấp hành Trung ương Đảng Cộng sản Việt Nam
Tuoitre.vn	150	93	140
Baomoi.com	576	168	744

Research on corruption, particularly the relationship between government procedures and bribery, was a major source of news attention. As an example, the 2012 PCI report provided a special section that probed changes in corruption over time (Malesky et al., 2012). Among the key findings of the report was that petty corruption (small facilitation fees paid to fulfill procedures) had declined, while grand corruption (i.e., kickbacks on government procurement or sweetheart land deals) were on the rise. In summarizing the findings, the PCI team reported that "firms are more likely to respond that government regulations, created to enrich officials through rents, and commissions on government contracting, remain a problem" (p. vi) The line immediately drew the attention of the Vietnamese media, with dozens of newspapers citing the findings. As Figure 5 shows, the above-the-fold headline of *Tuổi Trẻ* (2013) read

"Petty Corruption Declines, Grand Corruption Rises" and accompanied the photo with a fat bureaucrat holding an enormous rose-shaped pen to indicate his acceptance of *hoa hồng*. (In Vietnam, a rose flower is a pun for informal commissions). *Người Lao Động* newspaper's front page shouted, "42 percent of Firms Pay Informal Commissions on Procurement," citing another finding from the report.

These newspaper headlines (Figure 5) illustrate how the PCI's findings regarding the connection between cumbersome regulations and opportunities for corruption are informing ongoing Vietnamese public discussions and policy dialogues about the issue. In addition to pointing out this connection, the PCI highlights potential solutions through e-governance, one-stop shops, and the streamlining of regulatory procedures and inspections. Indeed, the central government's Resolution No. 19 NQ-CP on "Key Duties and Solutions to Improve the Business Environment and National Competitiveness"[15] specifically mandated that provincial governments use PCI data in improving their local regulations and reducing corrupt activity:

> "People's Committees of provinces and cities under central authority shall review their own regulations and implementation thereof, and set a target and a roadmap from now up to 2015 to achieve the level of high-ranking provinces and cities under the 2013 PCI." (Article 18)

Beyond simply setting a goal for producing legislation, subsequent clauses further mandate how local authorities will be evaluated on this task, essentially institutionalizing the PCI into the evaluation criteria of subnational officials for promotion.

Figure 5.   Media Coverage of PCI's Corruption Analysis

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[15] Nguyễn Tan Dung. 2014. "Resolution on Key Duties and Solutions to Improve Business Environment and Competitiveness," (19-NQ-CP), March 18, 2014. http://36mfjx1a0yt01ki78v3bb46n15gp.wpengine.netdna-cdn.com/wp-content/uploads/2014/03/Resolution-19-NQ-CP-18-03-2014-of-the-Government-Informal-English-Translation-24MAR.pdf

THE E-GOVERNANCE INITIATIVE

In 2020, Vietnamese leaders announced a new "National Digital Transformation Program by 2025, with an orientation towards 2030" and the National Board for E-Government Review, headed by the Prime Minister (Samuel, 2021). In line with recommendations from the PCI, the Government's goal for e-governance is to streamline regulatory and administrative procedures, reducing the number of bureaucrats that businesses must interact with and the amount of time necessary to complete business procedures. These endeavors remove discretion and power from lower-level bureaucrats, thereby reducing opportunities for bribery (Nga, 2020).

A key example is the digital one-stop shop (OSS), which reduces the number of steps necessary for a business to finalize a procedure. For instance, business registration requires a registration certificate, a tax code, and a police stamp, but businesses can apply for these all at once in a digital OSS, removing the need for face-to-face contact with the three different issuing agencies. Describing a digital OSS for customs procedures that unified the procedures of eleven different ministries, Pham Duyen Phuong, Deputy Director of the Information Technology and Statistics Department at the General Department of Customs, wrote:

> "The one-stop-shop mechanism saves time and money for businesses. It's more important that as the electronic system restricts contacts between businesses and state management agencies, it also reduces corruption, red tape, and inconveniences. On the other hand, state governance will improve because of more transparent and reliable information being handled." (Vietnam Extends Link to One-Stop-Shop Portal, 2018)

According to Pham, the system has saved businesses roughly $200 million USD per year in regulatory burdens while reducing document processing by thirty hours for each import or export dossier. Nguyen Hai Anh, Director of the IEA Import-Export Company, further explained, "Previously, import-export licenses were submitted to customs agencies in person. Now, the procedures are carried out online, saving time, energy, and manpower and enhancing business competitiveness." (Vietnam Extends Link to One-Stop-Shop Portal, 2018).

Following the National Transformation Plan, the Government aims to move 80 percent of public services and procedures onto a national web portal, allowing accessibility with mobile devices. All national databases for the population, land, business registration, and finance will be put online and connected to assist government reporting. In addition, Vietnam will make 90 percent of ministerial and provincial government work records available on the same website. To provide accountability for meeting these goals, the Government announced a ranking for e-government development for ministries, government agencies, and provincial administrations (Samuel, 2021).

Important progress has already been made on many of these goals. By the end of 2022, Vietnam had reduced and simplified over 1,100 business regulations and approved a plan to reduce and simplify 1,700 additional regulations in 125 legal documents. The Government currently provides 3,805 public services online, with more than 2.8 million citizens holding accounts. In 2022, over 4.78 million documents were processed online (three times higher than the same period last year), while more than 129.6 million documents were synchronized (twice as much as in 2021). More than 2.6 million online payment

transactions, worth over $117 million USD, were carried out, 16 times higher than during the same period in 2021 (Dharmaraj, 2022). In the critical space of tax procedures, 98 percent of businesses have now completed tax registration procedures using the online system, compared to 65 percent as of 2015, while tax submission times have dropped from 537 to 167 hours per year (Tong, 2018).

There were multiple phases of investment in developing an e-governance system, beginning in 2000 when Vietnam signed the e-ASEAN framework. Throughout the 2000s, the Government adopted several laws that created the legal foundation for the e-governance policies that followed—laws on online transactions (2005), internet communications technologies (ICT, 2006), telecommunications (2009), and radio frequency (2009). Formal resolutions for e-governance included the 2007 Resolution 64 on ICT applications in government agencies[16] and the 2009 Circular on digital public services.[17] In 2015, Resolution 36a/NQ-CP on e-government was passed, explaining e-governance as "a key driver for growth of knowledge economy, information society, national competitiveness, industrialization, modernization, and sustainable development in Vietnam" (Tong, 2018). These efforts received a further boost during the 2020-2022 Covid-19 pandemic when the government was forced to expedite its e-governance roll-out to provide basic services as well as allocate health insurance, transfer payments, and vaccinations (Nguyễn & Borazon, 2022).

In addition to the formal legislation, Vietnam has now put in place the necessary infrastructure for e-governance success. Over 90 percent of government employees have been equipped with a computer for work, and 100 percent of government employees have access to a local area network (LAN) of some type. Over 85 percent of employees have been connected to the government's special data transmission network, which has privacy and security settings to ensure the safe and private transmission of information and emails between government employees. On the demand side, Vietnam has an internet penetration rate of 77.4 percent and a cell phone penetration rate of 69 percent, and most Vietnamese use smartphones regularly (Statista, 2022). According to the 2021 PAPI survey, 51 percent of residents use the Internet as their primary source of information (CECODES & RTA, 2019).

This progress has been recognized internationally. The UN e-government survey (2022) ranked Vietnam at 86th out of 193 countries, up 13 places compared to 2015 (United Nations Department of Economics and Social Affairs, 2022). In the World Economic Forum's Network Readiness Ranking (2022), Vietnam's overall performance stood at 62nd out of 139 countries, increasing twenty places compared to 2015. Notably, Vietnam is first in e-commerce legislation and third in populations covered by at least a 3G mobile network (World Economic Forum, 2022).

The current anti-corruption campaign has continued this process, making e-governance a major focus in its three-pronged approach to tackling corruption. Eventually, the Government aims to provide all public services digitally through websites and online tools that citizens can access from their homes. Publicly, state and party leadership has committed to prioritizing its e-governance initiative over the next four years "with a vision to make Vietnam one of the top 30 countries in the world in terms of e-government and digital government" (Digwatch, 2021).

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[16] Resolution 64/2007/ND-CP

[17] Circular 26/2009/TT-BTTTT categorized four types of public services in Vietnam: Level 1 includes those providing information about processing, documenting, and fees of public services; Level 2 services cover Level 1 and allow users to download and notify completion of document forms; Level 3 services permit users to fill in and submit documents online; and Level 4 services incorporate all the previous three functions with the addition of an online payment service.

COMMENTARY

E-GOVERNANCE AND REGULATORY STREAMLINING EFFORTS HAVE BEEN SUCCESSFUL IN REDUCING CORRUPTION

Although there is more work to do, efforts to reduce corruption through regulatory streamlining have thus far proven successful. **Figure 6** provides a trace plot of all 63 provinces in Vietnam, showing the share of firms that spent over ten percent of their time on administrative compliance each year. The orange line focuses on the median province. The graph demonstrates that in 2014, 35 percent of firms in the median province spent an extraordinary amount of their time keeping up with regulations and procedures. The figure stayed constant until 2016 when reductions coincided with the anti-corruption campaign and the first national legislation on e-governance. Today, only 20 percent of businesses in the median province spend ten percent of their day on regulatory compliance.

Figure 6.   The Proportion of Firms That Spend More Than Ten Percent of Their Day Complying With Bureaucratic Requirements and Administrative Procedures Has Decreased Over Time

Gray lines depict trajectories of all 63 provinces.
The solid yellow line represents the median score in each year.
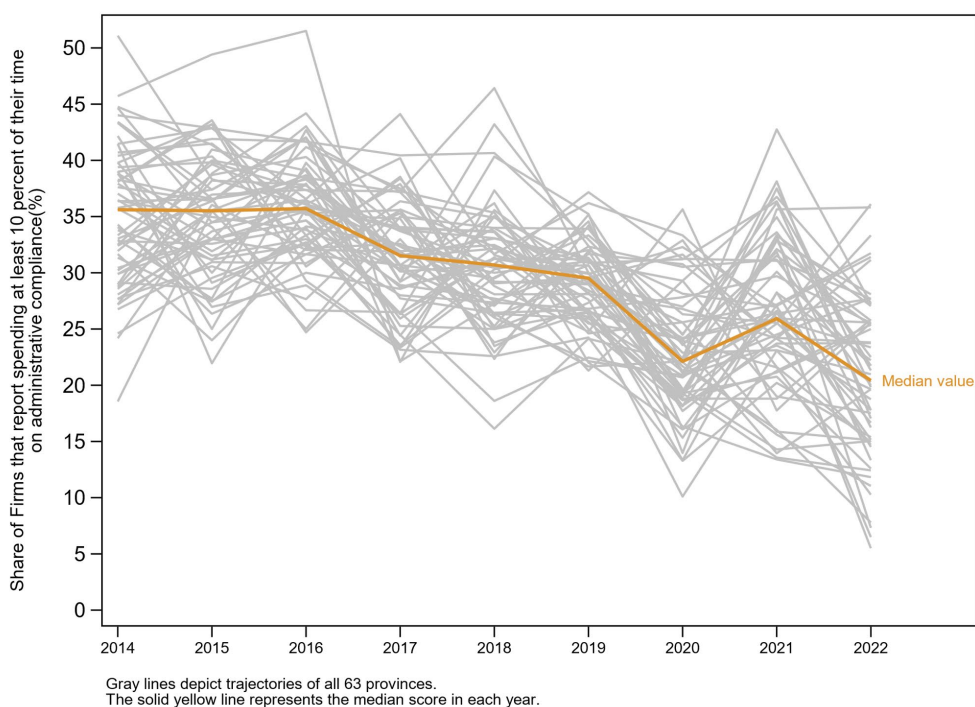
Source: 2021 PCI Survey. Question D1-1: "What percentage of senior management's time was spent to understand and comply with administrative procedures over the past year?" Malesky, Edmund, Phan Tuan Ngoc, and Pham Ngoc Thach, MY. 2022. The Vietnam Provincial Competitiveness Index: Measuring Economic Governance for Private Sector Development, Dataset, Vietnam Chamber of Commerce and Industry and United States Agency for International Development: Hanoi, Vietnam

Figure 7 illustrates how reductions in regulatory compliance burdens appear to coincide with reductions in corruption over the past seven years. For instance, at the end of the Nguyễn Tấn Dũng administration in 2016, 66 percent of private businesses said bribes were common, and nine percent of those businesses paid bribe costs exceeding ten percent of their business income. Today, those figures

have declined to **43** percent and **3.8** percent, respectively. Certainly, both of those numbers are too high, but they both represent tremendous progress. More impressionistically, in 2016 only **79** percent of businesses believed that bribes were at acceptable levels compared to just under **89** percent today.

These figures show that anti-corruption is about more than just high-profile arrests. Incremental reforms of regulations have improved the business environment in Vietnam directly.

Figure 7.   Gradual Decline in the Practice of Paying Informal Charges
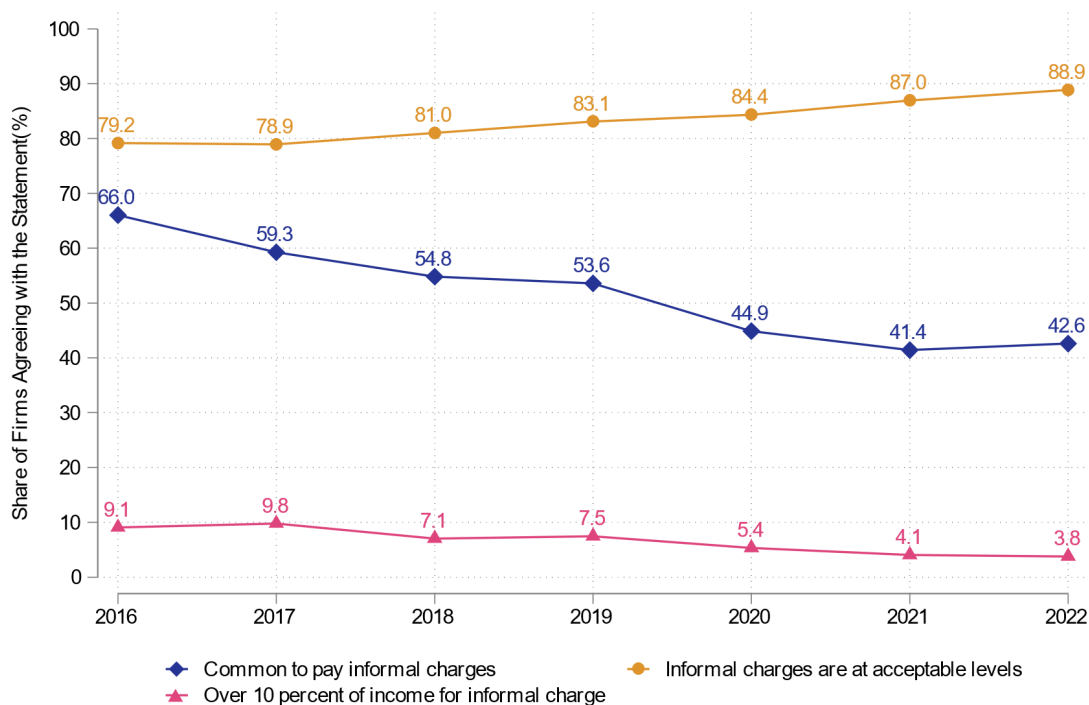
Source: 2022 PCI Survey. Malesky, Edmund, Phan Tuan Ngoc, and Pham Ngoc Thach, MY. 2022. The Vietnam Provincial Competitiveness Index: Measuring Economic Governance for Private Sector Development, Dataset, Vietnam Chamber of Commerce and Industry and United States Agency for International Development: Hanoi, Vietnam.

Question D1-3: "To what extent do you agree with the following statements? 'Informal charges are at an acceptable rate.'" Respondents were given multiple choice answers: i) Strongly Agree, ii) Agree, iii) Disagree, and iv) Strongly Disagree.

Question D3-12: "Do you agree with this statement: 'Firms in my line of business usually have to pay extra 'informal payments'?" Respondents were given multiple choice answers: i) Strongly Agree, ii) Agree, iii) Disagree, and iv) Strongly Disagree.

Question D3-13: "On average, what percentage of income do firms in your line of business typically pay per year for informal charges to public officials?" Respondents were given multiple choice answers: 1) zero percent, 2) Less than one percent, 3) From one to under two percent, 4) From two to under five percent, 5) From five to under ten percent, 6) From ten to under 20 percent, 7) From 20 to 30 percent, and 8) Above 30 percent.

DECADES OF GROUNDWORK AND SLOWLY GROWING PUBLIC PRESSURE FOR REFORM

Political will to fight corruption cannot be created overnight. Development assistance to facilitate anti-corruption takes time. Objective information needs to be gathered, research findings need to enter the

public sphere, entrenched officials must retire or be replaced, local champions must emerge, and solutions must be devised, legislated, and implemented. It is noteworthy that the PCI research team began their efforts in 2005, twelve years before the first sincere anti-corruption efforts in Vietnam and sixteen years before the blazing furnace was named.

SECTORAL POLICY PROBLEM MOTIVATES LEADERS

Vietnamese leaders, even some who may have benefited from corruption, understood the importance of growing the Vietnamese private sector. SOEs were inefficient and concentrated in capital-intensive sectors, where they could not assist with employment generation for Vietnam's rapidly growing labor force (with roughly 1.2 million entrants per year). Foreign investors were large and productive, but they accounted for a disproportionate share of manufacturing and exports. Reliance on foreign producers was risky if there were no spillovers to the domestic economy, as foreigners could easily leave for lower-cost environments. Consequently, Vietnamese leaders wanted to develop a robust private sector that could grow and eventually compete on the world stage. However, PCI data was clearly demonstrating that regulatory burdens and their association with corruption were constraining the size of private ventures. The costs of corruption were onerous and taxed revenue that businesses could have spent on more productive activities. At the same time, fears of bribery requests led businesses to stay small and informal, hiding the true scope of their activities from authorities.

CULTIVATING EFFECTIVE ANTI-CORRUPTION VOICES

Partnering with the VCCI Legal Department was critical, as they were effective advocates for the private sector within the Vietnam party-state apparatus. VCCI leaders held positions in the Vietnam National Assembly, led legal drafting committees, and hosted the annual Vietnam Business Forum, a dialogue between business leaders and government officials. VCCI officials were also willing to travel to provinces to lead diagnostics, where they worked with local leaders on understanding PCI data and identifying reform initiatives. The transfer of authority of the PCI to the VCCI through the US-AID Forward initiative in 2014 was a critical step because it localized the PCI data and advocacy efforts. This transfer to authority was particularly true for policies related to e-governance reforms.

OPENING A WINDOW OF OPPORTUNITY FOR ANTI-CORRUPTION

While the PCI research effort provided an underlying impetus, a political breakthrough came with the struggles of several highly prominent SOEs between 2012 and 2016, which highlighted the negative influence of corruption on the economy. The troubles would first come to a head in the 6th Plenum of the Central Committee (October 1–15, 2012) when the Politburo unanimously recommended consequences for its own serious mistakes in the management of the country, and "a comrade of the Political Bureau" was to be singled out for particular criticism (Koh, 2012). That comrade was Prime Minister Nguyễn Tấn Dũng. The Central Committee would eventually reject the politburo recommendation, and PM Dũng would emerge temporarily unscathed. However, in 2016, after a failed campaign to become the Party Secretary, Dũng resigned from the Central Committee and the Politburo. Dũng's fall from grace allowed General Secretary Trong to consolidate authority and pursue his three-pronged anti-corruption reforms in earnest. Initially, the campaign targeted affiliates of Dũng, which led many to dismiss it as merely elite political competition (Carothers, 2022), but eventually, non-connected officials and private sectors were targeted as well. According to an interview with analyst Dien Nguyễn An Luong, the primary reason for this sudden change in strategy was the "need to create an image of a

unified Communist Party" and the need to "quell political competition." Previously, it was an "unspoken rule to go after lower-level officials;" however, more recently, this has expanded to prosecute leaders at the highest levels of leadership as well (most notably the President).

OPENING EYES TO THE BENEFITS OF E-GOVERNANCE

According to expert Pham Thanh Nga, one tipping point causing the exponential growth of the digital government was the "attendance of an international conference with global leaders discussing anti-corruption reforms," which additionally created knowledge about the threat of cybersecurity and hacking and the potential consequences of data leaks. These goals, which were articulated to further align with the party leadership's goals for the growth of the Vietnamese economy, made e-governance a hand-in-glove fit with the Government's broader goals, making e-governance a much easier policy to implement.

CRITICAL HELP AT CRITICAL JUNCTURES

Within and outside the country, several partner agencies assist with e-governance implementation and training initiatives. These partnerships provide an extra layer of commitment and enforcement to reforms. They assist with the timeline and ensure the accuracy and quality of implementation. Over the course of this initiative, the Vietnamese government has partnered with several organizations besides USAID, including the World Bank, the United Nations Development Program, the United Nations Office on Drugs and Crime, and a host of other bilateral donors from Germany, Denmark, and the United Kingdom. These organizations have provided technical support to improve the regulatory environment and reduce corruption.

MORE WORK TO DO

As the graphs above demonstrate, much progress has been made to streamline administrative procedures and reduce corruption, but more work remains. Corruption is still at extraordinarily high levels, with just less than half of firms paying bribes. Finally, grand corruption in Vietnam remains pernicious. Two major corruption scandals in the procurement of testing and evacuation flights during Vietnam's effort to combat COVID-19 illustrate that some elite officials are still willing to risk the health and welfare of citizens for their own personal gain (Vu, 2023). These transgressions were discovered and punished, which is definitely progress. However, they should have never happened in the first place. At the same time, e-governance has not yet become normalized. Only 3.53 percent of respondents visited the portal in any capacity, and less than one percent clicked through to use it to complete procedures (CECODES & RTA, 2019, p. 83). Additional technical assistance will be needed to popularize e-governance and increase uptake among citizens.

ANNEX VIII: CASE STUDY OF TRANSPARENCY INITIATIVES TO COMBAT ILLICIT TIMBER IN MOZAMBIQUE

SUMMARY

For decades, internal population growth, bureaucratic and grand corruption, and demand from China for whole logs have exerted pressure on Mozambique's forest resources. This has led to massive trade in illicit timber, accelerating deforestation, armed conflict, and sustained criminal activity.

Unlike other case studies in this document, in Mozambique, there was no single, sustained research and engagement project like the PCI in Vietnam, no focused reformation like ProZorro in Ukraine, and no primary, centralizing organization like Proetica/Transparency International in Peru. Instead, there were many scattered efforts and multiple outcomes. Even so, the case can be broken down into the following types of efforts and rough (though not linear) progression: 1) information generation, 2) mobilization of local society, and 3) regulatory changes.

As with the other cases, the efforts in Mozambique were focused on mitigating a single sectoral problem, deforestation, and the approach towards corruption was largely indirect. And like the Peru and Ukrainian cases, progress was greatly encouraged by a window of opportunity, in this case, motivation caused by the Hidden Debt Scandal.

KEY THEMES FROM THE CASE

- Transparency, evidence generation, investigative journalism, and information dispersal played important roles in highlighting the ongoing threat of deforestation and pointing to illicit logging, fueled by corruption, as part of the problem.

- Donor engagement was important in supporting the early, external research and later in helping local actors further assess the forestry problems and policy and enforcement gaps and empowering advocates for change.

- The ability of advocates to take advantage of windows of opportunity, such as the Hidden Debt Scandal, helped to push through more extensive forestry protection legislation and stricter rules to reduce the role of illicit finance in the forestry sector.

- Ongoing engagement with local partners, such as environmental organizations and reform-minded legislators, was necessary to maintain the positive momentum for change and to limit new opportunities for corruption in the forestry sector.

COUNTRY CONTEXT

Population: Two-thirds of its estimated 32 million (2021) people live and work in rural areas.

Human Development: According to the UNDP, Mozambique's HDI value for 2021 was 0.446, positioning it at 185 out of 191 countries and territories. Basic services in education and health care are unevenly delivered, leading to spatial-and socio-political inequalities.

Economy: Mozambique is one of the few countries in Southern Africa that still has extensive forest areas, mostly Miombo woodlands, which occupy half (32 million hectares) of its land area (Global Forest Watch, 2022). Forests are essential to the country's social, economic, and environmental health. They supply fuelwood, non-timber forest products, and ecosystem services such as climate regulation, biodiversity, and habitat while contributing up to four percent a year to its GDP (Aquino, Kishor, Tacquidir, and Lim 2022).

Unfortunately, these forests have not been well protected, and uncontrolled, rapid deforestation has been endemic. Estimates show Mozambique has been losing around 138 million hectares of its natural forest per year (0.23 percent). Some of the loss is due to the conversion of forested land into small-scale agriculture, urban expansion, and the extraction of wood for household use, but a primary factor has been unchecked illegal logging. As of December 2022, 153,364 deforestation alerts were detected, which affected an area of approximately 1.80kha (Global Forest Watch, 2022).

Agriculture employs 70 percent of the country's active population but represents only 25.6 percent of GDP. Most agricultural production comes from family farms. Due to climate change, the sector is especially vulnerable to natural disasters such as droughts and floods (World Bank, 2020). Emissions from deforestation represent 80 percent of the total emissions for the country (Kachele, 2022).

Government: Mozambique is a semi-presidential system with both an elected President, who serves as head of state, and a 250-person parliament called the Assembly of the Republic. It is a multiparty system with representatives elected to five-year terms by proportional representation. The legislative journey can be complex, taking many years before passage and implementation. Even before passage, the process itself can be transformative, signaling stakeholders and changing perceptions.

SECTORAL PROBLEM AND THE POLICY CONTEXT

DEFORESTATION CAUSED BY ILLEGAL LOGGING

Mozambique's forests are state-owned, and about half are allocated for production. There is widespread illegal logging in the country, with China as the main destination for whole-log, banned species. Cross-border smuggling of illegal timber to Tanzania is also a serious problem (Chatham House, 2017). A recent assessment of forest operators by the Ministry of Land, Environment, and Rural Development revealed low compliance with key forest management environmental and social standards, with only 39 percent of forest concessionaires nationally demonstrating minimum compliance (MITADER, 2018).

Illegal logging, lack of adherence to management plans by concessionaires and license holders, and weak enforcement in the forest sector have led to harvest levels of hardwood in excess of the Government's Annual Allowable Cut volumes (AAC). The volume of export-oriented illegal logging has been surging, with estimates, for example, that 93 percent of all commercial logging was illegal in 2013 (EIA, 2014) and averaged 81 percent between 2007 and 2012, resulting in an estimated loss of $146 million USD of government revenues (MITADER, 2018).

CORRUPTION

The Corruption Risk Forecast labels Mozambique as one of the countries most at risk for corruption due to its poverty, low human development, and lack of cultural norms against corrupt practices by

officials. As the report put it, "Mozambique is among the countries with the lowest human development in the world, with such low normative constraints that kleptocracy can fully capture the state, even in cooperation with international banks." These issues are compounded by a lack of administrative transparency, combined with unaccountable resources and opaque public finance (Corruption Risk Forecast, 2021).

Criminal networks in the illicit timber trade have been established around certain local elites, who control ports and cities in the northern provinces. These networks (based on political/ethnic affiliation) facilitate local and foreign concessionaires to enable shipping of banned forest products. With strong ties to the ruling party, these Mozambican oligarchs are protected politically and operate in parallel to the State with relative impunity (Kripahl, 2021). Unfortunately, state-embedded actors are some of the most influential actors in organized crime (EIA, 2014).[18] On the local level, low-level corruption among public servants in key positions allows criminal networks and trades to flourish, especially within Mozambique's forests. Facilitation payments and bribes are commonly used to create falsified documents (export certifications, bills of lading, approvals at Natural Resource Checkpoints) meant to ensure that illegal whole log timber is neither being cut nor sold. (Oxpeckers, 2017).

The country has many formal transparency commitments, such as the Freedom of Information Acts (FOIA), United Nations Conventions Against Corruption (UNCAC), Financial Action Task Force Against Money Laundering, and EITI. However, availability, accessibility, and online coverage of public data in financial disclosures for public officials, conflict of interest disclosures, land cadaster, and budget expenditures do not exist (Corruption Risk Forecast, 2021). In 2020, public debt was estimated to be approximately 120 percent of GDP, due in large part to the now infamous—and natural resource-related—Hidden Debts Scandal (BTI, 2022).

> *"The only way ahead is through an alliance between the weak civil society and development donors to push for full transparency of public expenditures.*
>
> *"Donors' investment in civil society and community-level accountability may also help until some critical mass is built that can constrain the power of kleptocrats."*
>
> *Corruption Risk Forecast, 2022*

DONOR-SUPPORTED TRANSPARENCY INITIATIVES

RESEARCH INITIATIVES

There are three broad phases in the sectoral anti-corruption reform program that is taking place in Mozambique. The first is research and data creation. Throughout the 1990s and early 2000s, researchers from the *Universidade Eduardo Mondlane* (primarily Almeida Sitoe and Mario Falcao) began collecting data on deforestation throughout the country (Sitoe, Bila & MacQueen, 2003) and tied this destruction to exploitation of Mozambique's forests, primarily for exports destined for Asia. The Center for Forestry Research (CIFOR), and other donors, were instrumental in funding this research.

One particularly damning report was Chinese Takeaway (Mackenzie, 2006). Supported by Oxfam Novid, the Dutch NGO Hivos, and Christian Aid, it was described by one expert as "a scathing look at forest exploitation and the role of donors, the government, and China in failing to protect Mozambique's

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[18] For additional context, see the Global Initiative's "Where crime compounds conflict: Understanding northern Mozambique's vulnerabilities" and their Observatory Risk Bulletin 7 – Special edition on the Northern Mozambique crisis, or this news clip from Open AC (UK).

forests. That was the beginning of pressures that forced the government to take some action." (Interview with Luis N., 2022). This report built on the earlier deforestation research, and like many of these early research initiatives, it first gained traction in the global community, looking at the role of China in forest degradation, and later became part of the evidence that put pressure on the Government to address deforestation.

This academic work, and the work of other independent researchers, helped inform the International Institute for Environment and Development's (IIED) China-Africa Forest Governance project. The process is developing evidence and capacity, and the goal is sectoral: "to create opportunities for improving policy and Chinese company practices in favor of sustainable land use and benefits to local women and men in Cameroon, DRC, Mozambique, and Uganda" (IIED, n.d., para. 10). In 2009, the IIED began partnering with the Government, helping them with REDD+ readiness, which eventually led to additional funding for sustainable forestry management in Mozambique through REDD+'s Carbon Fund (funded by the World Bank).

These early research efforts (and later donor-supported programs, see next section) did not propose sweeping anti-corruption steps. In fact, many of the Government officials involved in the process were benefiting from the corruption (EIA, 2014). Instead, donors worked with and through local activists, Mozambican academics, and forestry consultants to undertake and build capacity for information creation and dispersal, with a focus on the sources of forest loss and their climate change implications. This sectoral approach was different from what many CSOs (for example, the work of the CIP (Public Integrity Center)) had been doing to draw attention to corruption. While advocacy can be helpful, these efforts were focused on problems in the sector, not identifying and punishing corrupt actors. Eventually, local actors used this information to push for new programs, better enforcement, and a new legal framework.

REDD+ WORKING GROUP IN MOZAMBIQUE

The second broad phase of forest sector reform in Mozambique was the wider dispersal of information and capacity building, primarily through REDD+ initiatives.

REDD+ is both a framework and a process created by the United Nations Convention on Climate Change to guide activities in the forest sector to reduce emissions from deforestation and forest degradation, as well as promote sustainable management of forests and enhance forest carbon stocks.

In 2009, under increased scrutiny and pressure from the international community and constituents at home, the Government approved the first REDD+ Working Group in Mozambique. The program was described by the Government as an important policy agenda for Mozambique to "overcome those issues of poverty, deforestation and climate change" (Republic of Mozambique, 2011), and in 2013, the World Bank's Forest Carbon Partnership Facility (FCPF) began working closely with the Government of Mozambique to implement a conservation and sustainable development program using the REDD+ framework (Forest Carbon Partnership Facility, 2023).[19]

The theory of change adopted by the REDD+ Working Group in Mozambique was that "improving the enabling environment for sustainable forest and agriculture management and investments will promote

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[19] The six pillars of REDD+ are Governance, Agriculture, Energy, Conservation, Sustainable Forest Management, and Restoration.

sustainable forest and land management practices, contribute to rural livelihood improvements, and support Mozambique's efforts to address the drivers of deforestation and forest degradation" (MITADER, 2016, p. 6).

Building on the work of earlier researchers, the IIED began working with the Government to prepare a REDD+ Readiness funding proposal, which requires developing "national strategies or action plans, policies and measures, and other capacity building" (UNFCCC, n.d., para. 3). They worked with local researchers and activists to increase transparency (generating new data, helping people understand and interpret this data, and building capacity to share this understanding) of the mechanics and impacts of deforestation and to begin identifying areas for reform. This work was primarily done through a series of consultations over eight years from 2011 through 2019 (Forest Carbon Partnership Facility, 2023).[20]

Although anti-corruption is not addressed explicitly in REDD+ objectives per se, their implementation[21] is focused on transparency and accountability measures and includes penalties issued for illegal logging through Word Bank-funded programs such as the Forest Investment Project (MozFIP), the Dedicated Grant Mechanism for Local Communities (MozDGM), the Mozambique Conservation Areas for Biodiversity and Development Project (MozBio), and the Forest Carbon Partnership Facility (FCPF) (Kaechele, 2022).[22] Early in the Workgroup's process, a revision of the legal framework was initiated, including changes in the Forest Policy, Strategy, and Law (including regulations concerning forest concessions) and preparation of a National Forest Program.

Over time, many other initiatives have emerged. Interviewees credit REDD+ as part of the process of creating political will within civil society to pressure politicians and the bureaucracy to do more to address deforestation and corruption. They provided civil society a platform to put pressure on the government to address corruption related to deforestation and forest degradation. This pressure, plus the financial incentives, all played a part in developing sectoral reforms and reducing space for corruption. These reforms include the following:

- Measures by the Ministry of Environment and Rural Development (MITADER) at the national level to strengthen governance and reduce illegality in the forest sector, including a 2015 moratorium on log exports and new simple licenses, which had been held by Chinese entrepreneurs engaging in the illicit export of whole logs, and a 2016 evaluation of forest operations, with the ultimate aim of revoking licenses or concessions of operators who did not meet minimum legal standards.

- Development of the 2016 Framework for Assessing and Monitoring Forest Governance, funded by the FAO, and the Program on Forests (PROFOR) of the World Bank, to diagnose the state of forest governance.

- The creation of a new forest law enforcement agency, the National Agency for Environmental Quality Control (AQUA).

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[20] For a complete list of events, compiled from the Forest Carbon Parnership Facility webpage, see https://docs.google.com/spreadsheets/d/1LOo1dvQyUOXMHOU20Djg61E3ECM7OgDbJEhf68jPZ5c/edit#gid=862126948.
[21] Through Word Bank-funded programs such as the Forest Investment Project (MozFIP), the Dedicated Grant Mechanism for Local Communities (MozDGM), the Mozambique Conservation Areas for Biodiversity and Development Project (MozBio), and the Forest Carbon Partnership Facility (FCPF)
[22] The country's ban on whole log exports, for example, was expanded to include all tree species, not just the first-class hardwoods banned under earlier law.

- A new forest law and forest development program, *Floresta em Pé*, with the former subject to a national consultation (McQueen & Falcao, 2017).

In a remarkable response to the findings developed through the REDD+ Working Group, the Government's *Política e Estratégia de Florestas* (Forestry Policy and Strategy) *2016–2026* called for a new Draft Forest Law. Though this law is still in draft form, its existence, combined with other, less sweeping reforms, is already shaping how forestry is being policed. In a Reuters report from 2018, an unnamed Chinese delegate at an international conference reported that Mozambique "was stepping up surveillance of imported hardwoods, and also plans measures to curb local consumption of rosewood" (Farge, 2018).

THE LAST PUSH: THE HIDDEN DEBT SCANDAL

The most recent (and ongoing) phase of reform, substantial legislative reform, was aided by the window of opportunity following the now infamous 2016 Hidden Debts Scandal.

In 2016, Mozambicans and donors were shocked to discover over $2 billion USD in hidden nationally guaranteed debt. The issuance of the guarantees had not followed Mozambican law, and much of the funding appeared to have disappeared. The discovery of this debt led to public outrage, donors suspending funding, the IMF suspending operations, and a climate where the will to address corruption was suddenly invigorated.

Government officials had created three state-owned enterprises that took on a massive amount of debt, with tentacles in the natural resource sector.[23] In a rare divergence from the country's culture of impunity, Mozambique's Attorney General began legal action against several Mozambican officials, while British authorities pressed charges against the lending financial institutions (Gebregziabher & Sala, 2022). Several trials were underway throughout 2019-2022 in different jurisdictions. The Minister of Finance and architect of the scandal currently awaits extradition to the US.

The fallout from the Hidden Debts Scandal has resulted in a massive economic and fiscal crisis. By the end of 2016, inflation had climbed to 17.4 percent, and growth fell, from 7.7 percent (2000–2016) to 3.3 percent (2016–2019) (Gebregziabher & Sala, 2022, para. 4). The crisis has instigated a diagnostic of needed anti-corruption interventions within various sectors, including those related to the forest sector, such as resource governance, transparency, AML/CFT, and the rule of law (International Monetary Fund, 2019).

At the same time, national and international investigative journalists gained a wide readership of published stories of continued illegal timber export to China, including the 2020 confiscation of 100 containers of whole logs in Cabo Delgado, where the current Islamic insurgency persists. Stories like these have gained traction because of the involvement of high-level government officials, the sensitivity of the public to corruption writ large, and the speculation of timber contributing to terrorist financing (Nhachote, 2023).

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[23] The scheme included control of overfishing, as well as security, on the northern Mozambican coast, thus, the scandal's nickname, the Tuna Bond Scandal: https://www.theguardian.com/business/2021/oct/19/credit-suisse-fined-350m-over-mozambique-tuna-bonds-loan-scandal

This combination of long-term engagement by donors to help create and dispose of deforestation data and a sudden corruption scandal has led to further forest and sectoral interventions with anti-corruption impacts.

- Beginning in 2020, and under the coordination of the National Directorate of Forests, the Ministry of Land and Environment reviewed the Forestry Law, and the law has now been debated by all Executive and State Representatives and Councils in all provinces. All indicators point toward passage (Interviews).

- Interdiction and prosecution of forest crimes have increased between 2020 and 2023 (Interviews; EIA, 2022).

- Deforestation in many of Mozambique's provinces has declined from peak tree cover loss throughout the country in 2017 (Global Forest Watch, 2021).

- The National REDD+ Strategy is informing the government's approaches to targeting interventions to key drivers of deforestation and forest degradation and is addressing institutional and capacity gaps.

- In 2021, Mozambique became the first country to receive payments from the World Bank's Forest Carbon Partnership Facility (FCPF) for independently verified jurisdictional REDD+ emission reductions. The FCPF fund paid Mozambique $6.4 million USD for reducing 1.28 million tons of carbon emissions since 2019 (Forest Carbon Partnership Faculty, 2022).

COMMENTARY

Four dominant themes emerge from this case.

THE ROLE OF TRANSPARENCY, EVIDENCE GENERATION, INVESTIGATIVE JOURNALISM, AND INFORMATION DISPERSAL

Early deforestation data helped create pressure for further investigation, and in 2016, it was data and information, particularly in the journalism sector, which were crucial in leveraging the "Hidden Debt" scandal, which, in turn, helped advance the Draft Forest Law. Continued support for transparent, accountable, and accessible field monitoring activities and ongoing information dispersal is one of the most important objectives of the new forest law compliance strategy (Natural Justice, 2022).

THE IMPORTANCE OF TECHNICAL SUPPORT AND DONOR PRESSURE IN SUPPORTING LOCAL NEEDS, LOCAL ASSESSMENT, AND LOCAL ADVOCATES

Over time, multiple small-scale engagements by donors in Mozambique in response to a specific, sectoral problem created an enabling environment for incremental reforms in the forest sector to be implemented in a context where political will (contrary to the narrative portrayed by elites) to address corruption was low. Specifically, implementing REDD+ provided mechanisms and space for civil society, local partners, implementers, and donors to surface complex roadblocks and suggest next steps. One of the elements that made the Working Group's recommendations more salient, practical, and workable was the inclusion of local civil society organizations, journalists, and researchers.

Donors stepped in along the arch of forest interventions to mitigate forest loss and concomitant climate change at key moments—to collect data, support consultation processes, and offer assistance when implementation was stalling.

TAKING ADVANTAGE OF WINDOWS OF OPPORTUNITY

Early in the process, there was no single moment or single initiative. Instead, donors prepared the groundwork, first by gathering data to help address locally-driven needs (deforestation) and then through more complex initiatives (REDD+). This data, and a fragmented but growing capacity to understand and use it, in turn, helped drive the adoption of many small changes and an agreement by the Government to propose a much larger legislative initiative. With the "help" of the Hidden Debt Scandal, a window of opportunity opened to push this larger legislative agenda forward and other substantial changes and anti-corruption initiatives. For example, the Government of Mozambique has undertaken an analysis of its current Anti-Money Laundering and Combating Financing of Terrorism (AML/CFT) regime, which lists illicit natural resource extraction as a top corruption sector and risk sector, and proposed banking and finance reforms.

The groundwork for this push, however, began much earlier. The previous three decades of donor-supported transparency initiatives, while appearing to have little impact on curbing corruption within the sector, helped create an enabling environment for progress.

THE NEED FOR ONGOING ENGAGEMENT

Despite recent breakthroughs, Mozambique tends to be incremental (e.g., its history with the land and other natural resource reform) and needs ongoing, focused attention to sustain political will. This will require further engagement, with local civil society organizations, journalists, researchers, and, in some cases, local governments and ongoing political analysis throughout the policy implementation process. USAID's Environmental Security and Resilience in Northern Mozambique (USAID ECOSMART-2) program, which works with Mozambique's Niassa Special Reserve (NSR) staff, and USAID's and USFS's partnership with Mozambique's National Administration for Conservation Areas (ANAC), the Mozambican Supreme Court, and Mozambique's Attorney General's Office (US Embassy in Mozambique, 2022), are two examples of the type of ongoing engagement that will be required moving forward.

> *"This is a victory against traffickers and organized crime, but the war against illegal timber trade from Mozambique is not over."*
>
> *Octavio Zilo, chief prosecutor of Cabo Delgado province (EIA, 2022)*

ANNEX IX: CASE STUDY OF DIGITAL PROCUREMENT IN UKRAINE

SUMMARY

Despite recent changes, Ukraine continues to experience significant levels of corruption. Until recently, a major challenge was government procurement. Issues surrounding the management of public procurement in Ukraine not only generated inefficiencies but also opened the door to corruption, allowing malign actors to walk through. Against the backdrop of the successful 2014 Revolution of Dignity and the accession of a new Government in Ukraine, activists at all levels of government and citizenry capitalized on the momentum to push for anti-corruption reform and further the country's aspirations of joining the European Union (EU).[24]

This convergence of factors in 2014 created a window of opportunity necessary for the creation of ProZorro, a digital e-procurement system built on the principle of total transparency. Though it is only one piece of the larger anti-corruption narrative throughout Ukraine's history, ProZorro's primary impact has been to change the system and the environment in which procurement takes place, reducing individual discretion in procurement procedures and making corruption easier to detect and, therefore, less likely.

While earlier protest movements had called for change and, in some instances, led to new leadership, ProZorro was the first successful collaboration of citizens, civil society, business, and government leaders to implement substantial policy change. ProZorro's emergence, adoption, and implementation occurred not only because new leaders came to power and pushed for change. It began as a bottom-up, grassroots, sectoral approach that then gained traction and ultimately created the political will for top-down implementation and the creation of new national standards. The strength of Ukraine's civil society, the independence of the media, and action on the part of citizens who wanted change led to the production of a tool with immense impact.

KEY THEMES

- Capitalizing on the momentum immediately following the 2014 Revolution of Dignity and the rise of new political leadership, activists chose a single problem, government procurement, to make rapid progress.

- Early in the process, they made the strategic decision to partner with business and political leaders, as well as civil society, a partnership they called the "Golden Triangle."

- While anti-corruption was clearly a goal, the focus of the system they built was narrow: "total transparency." Operationally, anti-corruption was a secondary effect.

- International pressure, particularly the desire for EU ascension, and donor contribution at key moments, helped build and sustain momentum.

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[24] The push for EU accession, as it has been in other countries, was an important part of the underlying impetus and ongoing motivation for reform. In the Western Balkans, for example, Stabilisation and Association Agreements with the EU are simultaneously "opening up trade and aligning the region with EU standards."

- "Total transparency," for the purpose of improving the country, is an idea that grows out of Ukraine's cultural context. (Understanding and leveraging cultural context is a key theme across all the case studies in the document.)

COUNTRY CONTEXT

Economy: After Ukraine achieved independence in 1991, control of the economy "shifted from the former communist leadership in Moscow to what watchdogs called 'clans'—private networks of ownership defined by intimidation, cronyism, and crime" (Hayda, 2023). In later years, power shifted back and forth between pro-Russian and pro-democracy factions, but from the earliest days, a system of oligarchs emerged, and they quickly captured—and in many cases, continue to control—the primary functions of government and created processes that would serve their personal interests over the public good. The procurement sector became a prime example of this dynamic. In this low political-will context, anti-corruption actors needed to fight not only the individuals in office but also the system that secured their influence. According to the European Bank for Reconstruction and Development (EBRD), "one long-lasting legacy of the Soviet era was a procurement regime controlled by the country's ruling elite and exploited in their financial and political interests" (EBRD, 2017).

Public procurement is a significant part of the country's economy. In 2012, before the country's economic downturn, government purchases represented 32 percent of Ukraine's GDP. In 2015, the total value of procurement contracts amounted to 192 billion UAH (Transparency International, 2017, p.8; Prozorro, 2023).

Corruption Index: Even with recent changes, Ukraine is still a corrupt country. In 2014, its CPI score was 26/100, ranking 142nd out of 175. Its 2022 ranking in Transparency International's Corruption Perceptions Index was 116 out of 180 countries, with a score of 33 percent. According to the Global Corruption Barometer, 23 percent of public service users in Ukraine had paid a bribe in the previous year.

Conflict and Political Transitions: The people of Ukraine have demonstrated a relentless desire for meaningful reform. In 2004, the Orange Revolution ensured the election of Western-oriented Viktor Yushchenko over Kremlin-backed Viktor Yanukovych. In 2014, when Yanukovych regained power and then reneged on talks to further Ukraine's alignment with the EU, the Revolution of Dignity led to his replacement. In these instances, Ukrainian people used their votes and voices to call for politicians more aligned with popular goals. The current conflict with Russia has not dampened this desire or the demand for change.

Human Development: According to UNDP's Human Development Index for 2021, Ukraine had an HDI value of 0.773, ranked 77 out of 191 countries, and achieved a high human development classification. When considering adjustments to HDI indicators to account for inequality, Ukraine loses 6.1 percent in terms of human development progress due to inequality.

SECTORAL PROBLEM AND THE POLICY CONTEXT

PUBLIC PROCUREMENT

Prior to the creation of ProZorro, government officials conducted procurement using an opaque, paper-based system that allowed for a significant degree of inefficiency, corruption, and consequent loss of

public funds. An estimated 60 billion UAH ($ 1.6 billion USD) per year was lost to corruption and lack of competition (Prozorro, 2017). The country's procurement laws have been frequently revised and re-written, but the changes have been largely superficial, adding complexity (and inefficiency) without addressing the system's antiquated approach.

With the paper-based system, bidders submitted their offers in writing and could appear in person during the disclosure process, making it difficult for officials to maintain strict regulations and objectivity in the procurement process. The system was complicated, inconvenient for suppliers, and difficult to control. It reduced competition and made abuses much easier to carry out (ProZorro, 2017).

Hidden behind the paper-based system, there were layers of complexity and closed access. In the area of Government medical procurements, for example, insiders could "specify a dose or form of active substance that perhaps could only be supplied by one factory. They made the registration process and access to tenders so bureaucratic it wasn't worth the effort for non-resident manufacturers to participate. That left the market filled with distributors loyal to the leadership, more than happy to resell medicines and receive fat profits" (Open Contract Partnership, 2021). According to one estimate, price inflation for pharmaceutical products reached 40 percent (Pravda, 2015).

Further, a lack of expertise among procurement officials—resulting partly from frequent changes to the legal framework and a constantly shifting regulatory landscape—increased inefficiency (Transparency International, 2017).

CORRUPTION

Ukraine's oligarchs, especially those in government, managed to manipulate this system for personal gain and conducted deals within a closed circle, eliminating competition. The prevalence of state-owned enterprises facilitated their operations, and while the shift to privatization partially alleviated this issue, without a functioning court system, accountability remained elusive. The combination of an inefficient system, untrained officials, and corrupt actors led to a situation where "the Appellate Authority receives more than 600 claims each year related to unlawful processes" (Practical Law, 2023).

The deeply rooted challenges prolonging corruption in public procurement remain closely tied to Ukraine's history, social context, and "heritage of a crony economy" (Corruption Risk, 2023). Independence created a vacuum of power in Ukraine, allowing for the emergence of private networks and oligarchy (Hayda, 2023). These actors remain a powerful force in Ukrainian politics and business. Taking advantage of the inefficient system of public procurement, oligarchs grant contracts to their associates and manipulate members of the civil service, allowing them to operate with impunity. Other forms of corruption in procurement can be seen in the health sector. For example, "anonymous foreign shell companies have been used to siphon off money meant for vaccines and medicines, and hospitals have been hit with contracts for equipment costing thousands of dollars more than it should" (Hayda, 2016).

While Ukraine's revolutions—most notably the Orange Revolution in 2004 and the Revolution of Dignity in 2014—may have led to political transitions, they did not successfully alter the conditions in which corruption thrives.

PRIOR PROCUREMENT LEGISLATION

There have been several legislative attempts to reform procurement, including in 2000 and 2012; however, it was not until the 2016 creation of ProZorro and enforcement of e-procurement that the Ukrainian government significantly reduced procurement corruption. The primary changes involved moving management of the process to different entities, increasing the exceptions to the laws, and attempting to harmonize laws with the EU (Kyiv School of Economics and Transparency International, 2017). These efforts did not address the role of all critical actors, were often too narrowly focused on specific types of procurement, and frequently changed the threshold for monitoring. The frequency of the changes created a general lack of clarity about the rules governing procurement.

PROZORRO E-GOVERNANCE

PRODUCT, PLAN, AND PURPOSE

ProZorro is a digital e-procurement system designed to prioritize transparency, simplicity, efficiency, and competition. Its official motto is "Everyone can see everything" (ProZorro2023). The system consists of a public procurement web portal that consolidates all electronic tenders in a central database, supported by an auction module and web portal, all managed by a state-owned enterprise, ProZorro, and coordinated by the Ministry of Economic Development and Trade. Civil society groups monitor transactions through the Business Intelligence (BI) model, while the private sector supports operations of the online marketplace. This multi-stakeholder approach has helped to overcome resistance to the platform and maintain ongoing support. Corruption itself is not the core issue ProZorro aimed to solve, but anti-corruption has become a significant by-product of improving the public procurement system.

In the days immediately following the 2014 Revolution of Dignity and the return to the 2004 Constitution, an individual named Olexandr Starodubtsev posted on Facebook, calling on interested volunteers to meet at a coworking space in Kyiv to discuss how to counter corruption in public procurement. He posted: "Guys, we won the revolution. So right now, it's our responsibility to go and transform our country." The individuals who came to that meeting—primarily young people from the business sector—constituted the original team that created ProZorro.

Over the next few months, the team developed the ProZorro concept and connected with Transparency International (TI) Ukraine. TI provided the necessary support to lend experience and credibility to their ideas. A critical shift in approach during this time was the decision to focus on total transparency. The initiative combined local volunteers and civil society before gaining traction in the national government when Olexandr Starodubtsev joined the Ministry of Economy as head of the Public Procurement Department and continued developing and promoting the concept of ProZorro from inside the government. From there, it was a matter of months before the team piloted the concept, secured funding, and launched the ProZorro system on a national scale. The 2016 law on public procurement mandates the use of ProZorro at all levels throughout the country, marking the most significant legal breakthrough in Ukraine's history of anti-corruption reform.

In an interview with Starodubtsev, he did not distinguish between "fixing the country," "combating corruption," and addressing procurement. While he and his working group were clearly focused on combating corruption, the intervention was focused on how improving a specific sectoral problem, procurement, could help bring about this meaningful change. They aimed to enforce a system of total

transparency that would in turn limit opportunities for corruption and thereby reduce the level of funds wasted through public procurement. According to ProZorro's official website, its mission is "enabling a healthy collaboration between business, government, and civil society by building trust to public procurement for the reconstruction of Ukraine and improvement of the world" (ProZorro, 2023).

THE POST-REVOLUTION WINDOW OF OPPORTUNITY AND ACCEPTANCE OF PROZORRO

The 2014 revolution and the ascension of new government officials, some of whom welcomed the reform, opened a window of opportunity to push ahead in an effort that had been tried before—and failed. Long before Starodubtsev's call to action, procurement reform legislation had been tried, the high cost of procurement recognized, and public and international pressure exerted. The ProZorro team capitalized on these trends and the opportunity presented by the change in government by choosing a sectoral issue, building a coalition, and harnessing the economic and political interests of high-level officials and business leaders to generate support for greater transparency. ProZorro began as a bottom-up, grassroots, sectoral approach that then gained traction and ultimately created the political will for top-down implementation and the creation of new national standards.

Converging Factors: Prior to the Revolution of Dignity, Ukraine's citizens had expressed their desire to align with the EU and with the West.[25] Yanukovych's decision to renege on his commitment to work toward EU association and instead form deeper ties with Moscow resulted in an uprising. A series of popular demonstrations, evident citizen support for anti-corruption efforts, widespread desire to join the EU, and a wave of new government officials created the perfect environment for ProZorro. Knowing the significant share of the budget allocated for procurement, Starodubtsev targeted this sector for reform.

Trajectory of ProZorro's Development: In March 2014, Starodubtsev's call to action gathered the initial team in Kyiv. Over the subsequent months, they gathered information and developed an initial concept. They piloted a minimum viable product (MVP) in October 2014, and beginning in March 2015, the volunteer team began the shift to civil service. From June 2015 to March 2016, they finalized the system's development, and in August 2016, legislation was passed requiring all central executive bodies and state-owned natural monopolies to conduct procurements exclusively through ProZorro (ProZorro, 2017).

Impact Metrics: Despite the ongoing levels of corruption (its 2022 ranking in Transparency International's Corruption Perceptions Index was 116 out of 180 countries), Ukraine ranks number 1 out of 114 countries in terms of administrative transparency and 92 percent on the transparency index (Corruption Risk, 2023). ProZorro has also significantly increased the level of competition among bidders. In 2021, the Municipal Competitiveness Index (MCI) interviewed 7,454 companies and individual entrepreneurs throughout Ukraine to assess their experience with the procurement process. Across the ten components that serve as indicators of competitiveness, Ukraine's oblast (provincial) capitals improved their MCI scores in six categories while experiencing setbacks in four others.

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[25] Notably, this popular opinion remained concentrated in the West. Ukrainians residing in the East of the country, particularly in annexed Crimea, continued to support connections with Russia.

Table 9.   2021 MCI Indicators by Oblast (Provincial) Capitals

NATIONAL MCI 2021 (OBLAST CAPITALS)

54,68

– national MCI 2021

It is 0.04 points less than the national MCI 2019/2020 – 54.72.

None of the indicators received a high score (7 and above)

Subindex	MCI 2021	MCI 2019/2020	MCI 2021 vs. MCI 2019/2020
Component 1. Starting a business	6,20	5,77	↑0,43
Component 2. Access to public property	5,51	5,24	↑0,27
Component 3. Transparency and openness of data	5,54	5,33	↑0,21
Component 4. Cost of compliance	6,28	7,08	↓-0,80
Component 5. Taxes and duties	5,19	5,69	↓-0,50
Component 6. Informal payments and corruption	5,45	5,19	↑0,26
Component 7. Security of business operation	6,31	5,59	↑0,72
Component 8. Leadership of municipal authority	5,02	5,31	↓-0,29
Component 9. Resources for development	4,69	4,66	↑0,03
Component 10. Support of innovations	4,48	4,86	↓-0,38
Національний ІКМ	54,68	54,72	↓-0,04

Source: Municipal Competitiveness Index 2021 {Presentation}. Available at http://www.ier.com.ua/en/mci/index_2021.

For indicators tied most closely to ProZorro, Transparency and openness of data increased by .21 points, and Informal payments and corruption improved by .26. One of the components in which Ukraine's MCI score fell was the cost of compliance. This drop, however, may be the result of increased procurement regulation to ensure transparency and counter-corruption expenditures (The Institute for Economic Research and Policy Consulting, 2021).

Overall, Ukraine's national MCI score fell by .04 points from 2020 to 2021, indicating a fairly consistent competitiveness score despite the setbacks caused by the COVID-19 pandemic. Looking at the provinces individually, many scored high (11), most scored average (25), and (9), primarily in the east and central, scored low.

Table 10. 2021 MCI Ranking by Oblast (Provincial) Capitals

Source: Municipal Competitiveness Index 2021 {Presentation}. Available at
http://www.ier.com.ua/en/mci/index_2021.

In July 2016, when the system was scaled to the national level, the total value of procurement contracts grew from 192 billion UAH ($5.2 billion USD) in 2015 to 232.1 billion UAH ($6.3 billion USD) in 2016. At the same time, the number of new registrations increased by 43 percent (Prozorro, 2017), Government savings rose 14.1 percent (Neumann, 2017), and the percentage of public procurement participants reporting corruption declined sharply, from 54 percent in 2015 to 29 percent in July 2016 (Neumann, 2017). These statistics demonstrate how ProZorro has increased the efficiency and transparency of procurement, attracted new bidders and more contracts at higher values, and improved economic growth throughout Ukraine.

Role of Donors: International donors contributed to the development of ProZorro through initial funding for the minimum viable product and ultimately provided the necessary means for expanding the system and scaling to a national level. The earliest donors included the European Bank for Reconstruction and Development (EBRD), the World Bank, and USAID. This support provided some motivation for potential "spoilers" of the ProZorro movement, primarily those Government officials aligned with Ukraine's oligarchs. While the funding targeted developing ProZorro, improving procurement was tied to other funding, as well as EU ascension, thus providing political cover even to those officials not supportive of this integration in the long run.

This support provided significant motivation for potential spoilers of the ProZorro movement to pursue reforms that would bring economic gain and, by extension, anti-corruption measures One salient example of this dynamic is Ukraine's partnership with the EBRD to achieve the reforms necessary to join the World Trade Organization's (WTO) Agreement on Government Procurement. In 2011, the Ukrainian Government requested EBRD's assistance with its WTO GPA application. Due to the stringent requirements for membership, substantial reforms to Ukraine's procurement system were necessary. However, the potential benefits ensured political support: "WTO GPA accession allows businesses from other GPA countries to bid for Ukrainian public contracts, further stimulating

competition while also giving the Ukrainian authorities access to the best suppliers the world has to offer" (McDonough, 2017). Even officials with no political will for procurement reform were feeling pressure to provide citizens with higher quality and better goods.

EBRD provided Ukraine with the initial support needed to ensure GPA compliance and initial funding once the country seized upon the potential for reform provided by ProZorro. The EBRD contributed funding for the ProZorro pilot project and subsequent civil society training programs to help scale the initiative. The Bank's support is an example of how international donors have supported and guided Ukraine's path to procurement reform. This form of long-term accompaniment was vital in supporting political will to enable and support ongoing efforts.

PROZORRO DURING THE WAR

Since Russia invaded Ukraine in February 2022, anti-corruption efforts have not halted, but they have been altered. ProZorro remains in use, though politicians are no longer required to list all assets and financial information in detail. While one report stated that civil society actors appear less forthcoming with their criticisms of the government to avoid Russia's weaponization of perceived weaknesses, this dynamic has sustained the political will of the Government's ongoing fight against corruption. In February 2023, the Zelensky Government undertook a series of dismissals of high-profile government officials involved in scandals. In particular, the former Minister of Defense resigned when reporters released information that the ministry overpaid for soldiers' meals (Law, 2023). However, the reporter who unearthed the story did so using paper-based government contracts because public access to military information was suspended during the war (Deprez, 2023). This story illustrates how ProZorro, an e-procurement system, has created conditions that complicate corruption. Paring back these systems creates greater opportunity for corrupt actors to take advantage of the chaos. While risking Russia's manipulation of the information, Zelensky's crackdown was met with praise from Western governments, including the United States. Republican legislators used the opportunity to praise Zelensky's response to corruption and reaffirm their military support for Ukraine.

COMMENTARY

ACTIVISTS CAPITALIZING ON THE MOMENTUM

Ukraine had experienced revolutions, popular discontent, and political transition at previous points in its history; however, in 2014, these factors led to sustained reform. Though ProZorro initially encountered resistance from certain corners of the Government, the simplicity of the tool and its fundamental focus on total transparency became impossible to refuse. The actors involved—ranging from government officials to young volunteers—relentlessly pushed forward with their ideas. They targeted a single sector and leveraged the momentum of the moment, channeling it into the action that created ProZorro.

PARTNERING WITH CIVIL SOCIETY, PLUS BUSINESS, AND POLITICAL LEADERS

A fundamental principle of ProZorro is the "Golden Triangle" partnership between the government, civil society, and the business sector. The combination of actors strengthens the procurement tool as well as its political influence. While evident in ongoing platform operations, this coalition-based approach constituted a significant factor in the success of the initial platform development and implementation. Private sector volunteers enlisted the support of civil society by working with TI-Ukraine. They also

furthered the progress and legitimacy of the initiative by working with the Minister of Economy and ultimately joining the Government. Additional support from multilateral and international donors solidified their progress.

ANTI-CORRUPTION AS A SECONDARY EFFECT

ProZorro did not attack corrupt actors with punitive measures. Instead, the tool created a new procurement process that targeted the underlying sectoral problems—inefficient paper-based systems and lack of expertise among civil servants—and as a secondary effect, made corruption more difficult for malign actors. Rather than changing the rules to punish corruption, ProZorro altered the system by focusing on transparency and, in doing so, changed the dynamic of reform: instead of legislating the details and thresholds, it shed light on the whole procurement process.

THE ROLE OF INTERNATIONAL INFLUENCE

Throughout Ukraine's history of anti-corruption reform, a core theme emerges—association with the EU. Ukraine's high level of corruption historically has represented a major obstacle to EU association, and subsequent regulatory adjustments and legislative changes aim to align with EU standards. According to one expert, "The goal of joining the EU and the goal of harmonizing our legislation with the European legislation was the push for this whole changing of the public procurement system" (Julia Dvornyk, personal communication, January 10, 2023). While this cannot be considered the sole factor motivating change in Ukraine, EU association has remained a strong incentive for anti-corruption reform. Beyond the EU, Western nations' financial support for Ukraine during the conflicts throughout its history often goes hand in hand with expectations of transparency and integrity in the management of donated funds and resources. ProZorro created a tool that helped to ensure greater accountability and more responsible management of funds, which was then used as leverage to secure more funds. This dynamic continues to play out during the current conflict. Ukraine's demonstration of its ability to manage international donations will prove essential during the country's eventual reconstruction.

UNDERSTANDING AND LEVERAGING CULTURAL CONTEXT

The concept of total transparency, "everyone sees everything," gained traction and acceptance in Ukraine in a way that might not be possible in other political or social contexts. In no other country are laws regulating politicians' disclosures of their finances and assets as stringent as those in Ukraine. The acceptance of such a system can be traced to Ukraine's cultural context. There is an undercurrent of social dynamic that values transparency and welfare. Individual Ukrainians collaborate to achieve social gains, but with their own interests in mind:

> "Ukrainian civil society individuals feel empowered to act on their own behalf, and communities will organize to deal with community-level problems. If you go to the villages in Ukraine, you will see that people cooperate for social benefits, but also because it benefits themselves. It's not that there isn't corruption in the small villages and elsewhere in Ukraine, but there is a cultural value that they attach to independence and to social welfare. And that, I think, is one of the invisible traits that dictate how issues of corruption and undue influence have evolved in Ukraine. The questions are more about

>specific moments and actions taken, but those moments and actions are dependent upon how society sees its role." (Dirk Mattheisen, President, Partnership for Transparency {Personal communication, January 10, 2023})

This understanding of the interplay between individual and common good, in combination with a decentralized government, has enabled other initiatives, such as a digital biometric passport system established in Ukraine in 2020 (Pascu, 2020), underscoring the country's acceptance of digital tools and widespread access, combined with centralized storage of sensitive data.

ANNEX X: CASE STUDY OF SOCIAL AUDITS IN PERÚ

SUMMARY

Corruption in Perú is widespread, generating estimated losses of more than three billion US dollars (11 billion Sol) annually, entangling an estimated 37,000 public officials, and contributing to poor service delivery (Corruption Risk Forecast, 2022). The country has also experienced escalating instability when, during the time of this writing. Former President Pedro Castillo, elected in 2019, was ousted and detained in 2022 after attempting to shut down the country's legislature to avoid an impeachment trial. Instability since the ouster has persisted, with protests among his supporters leading to violent clashes.

Despite longstanding corruption posing challenges for reformers, windows of opportunity for anti-corruption reform emerged when high-profile corruption scandals helped highlight service delivery problems and elevated the salience of the problem as a policy issue for decision-makers. Two of these scandals in particular– *Lava Jato* and *Los Cuellos Blancos Del Puerto* – raised publicity and media attention causing problems for elites and leaders facing public dissatisfaction around corruption alongside poor services related to infrastructure, justice, health, and education.

Transparency International (TI) 's national chapter, Proética, was well positioned to support changes when opportunities emerged for government to respond to failing services and widespread public dissatisfaction. Proética conducts social audits in various sectors through "citizen brigades," among other activities. Supported by TI's global network and by donors, Proética's deployment and expansion of these audits over time in many geographic areas helped position the organization to later be called on by the Peruvian government to contribute to a Commission on reform. Although the result of these engagements has been modest, with reforms proposed, but the implementation still weak, the case demonstrates how social audits offered a solution to problems government leaders faced. Through the lens of the Perú case, social audits can contribute to changes when opportunities for government buy-in emerge, but they require sustained support to enable lasting change.

KEY THEMES

- Corruption is widespread in Perú, shaping current instability and resulting in poor service delivery. Several high-profile cases exposed how heavily rampant corruption marred effective service delivery in infrastructure, the justice sector, and beyond.

- Social audits can threaten a government if they expose current practices, but, when strategically leveraged to help solve leaders' policy problems by providing valuable information and helping respond to public outcry, they can offer a politically savvy solution for change.

- Social audits offered a promising approach when the government sought to solve problems stemming from related fallout from scandals by engaging with local citizen groups to gather information and solve problems related to specific sectors that auditors covered.

- As with other anti-corruption efforts, social audits will often require long-term engagement and building strategies and channels for activities over time, such that these systems can be optimally leveraged when the opportunity for scaling up activities and heightened government buy-in emerge.

COUNTRY CONTEXT

Population: Perú has a population of 34,213,827, with many concentrated in its capital, Lima (home to 9,886,866 people), which is the fourth largest city in South America. A significant proportion of its population (almost 22 percent of an estimated 33 million (2021) people) live and work in rural areas. It is a multi-ethnic country whose population is composed of Amerindian, mestizo (mixed Amerindian and white), white, Black, Japanese, and Chinese (Country Reports, 2023).

Human Development: According to UNDP, Perú's HDI value for 2021 was 0.762, positioning it at 84 out of 191 countries and territories. Perú's debt per capita has risen incrementally since 2000, from $858 USD (5,458 Sol) in 2000 to $2,436 USD (8,848 Sol) as of 2021 (Country Economy, 2023).

Economy: Perú's economy is slowing in growth, partially impacted by COVID-19. The economy is expected to grow somewhat below its three percent pre-pandemic pace in the medium term, supported by higher exports, while domestic demand is projected to slow in the context of low business confidence, lower growth of trading partners, and volatile energy prices. Poverty persists at a rate of around 20.2 percent (World Bank) and is forecasted to remain above pre-pandemic levels in the next two years, hampered by a low average quality of employment. Important structural challenges for the Peruvian economy include reducing the relative size of the informal sector, which employs three-quarters of workers in low-productivity jobs, and improving the quality of government services, including education, health, and water (World Bank, 2020).

Governance: The country's government, a presidential system, is divided into 25 administrative regions. Its democratic quality has declined from "free" to "partly free" according to Freedom House (2021) and has been marked by political clashes between the country's presidency and Congress. The 130-member unicameral Congress elects members for five-year terms and temporarily dissolved in 2019 under President Vizcarra, which led to extraordinary legislative elections. Governance in Perú has been highly constrained by this political instability and widespread corruption and, despite some areas of progress, including in education and service delivery, remains weak (Kaufmann & Montoriol-Garriga, 2008). Perú's justice system includes a Supreme Court along with lower courts, with judges appointed by the country's Junta Nacional de Justicia (National Board of Justice).

SECTORAL PROBLEM AND THE POLICY CONTEXT

POOR AND INEFFICIENT SERVICE DELIVERY

The delivery of public services in Perú has been a significant problem for decades, touching all sectors, including public health, education, construction and infrastructure, justice, and others. According to an interview, service delivery is "the biggest problem that Perú has right now. The situation is very delicate, because it crosses the entire political arena and, of course, the institutions" (Interview, 02/02/2023).

Perú's education system illustrates just one prominent area plagued by weak service delivery. The country ranks as the worst performing among the Programme for International Student Assessment (PISA) rankings. According to the OECD, barriers to high-quality education in Perú have included poor infrastructure, inadequate learning materials, and a lack of trained teachers and are widespread, with the worst impacts in rural areas (OECD, 2016).

The health sector has also suffered for decades, shaped by underinvestment (less than three percent of GDP) in public health care and inadequate access to high-quality and affordable medicines (Orellano and Macavilca, 2020). Illustrative of the scale of problems in the health sector, according to one report, is the incredibly high cost of pharmaceuticals. In 2014, patients in Perú paid $10.50 USD per pill for the antiretroviral drug *atazanavir*, a pill that cost just $3.60 in Brazil and as low as $0.50 in international markets (Hufstader, 2018). Indicative of these major failures within the health sector, Perú had the world's highest COVID-19 mortality rate in 2021 (WHO).

POOR SERVICE DELIVERY IN THE CONTEXT OF CORRUPTION

These challenges to effective service delivery across multiple sectors are shaped by a context of widespread corruption. According to Transparency International's 2022 Perceptions of Corruption study, 59 percent of Peruvians say that corruption has damaged their family's finances. Congress is seen by 60 percent of citizens to be corrupt. The term of the current congress has resulted in widespread damages for the country, from corrupt fertilizer purchases intensifying Perú's food crisis, to dangerous and unregulated transit, to un-democratic political outcomes (Tegel, 2023).

Corruption cases have involved high-level private company officials and state officials, including members of the judiciary, congress, and the executive branches, involving influence peddling, bribery at different levels, and the use of privileges such as prosecutorial immunity. While temporary institutions and special commissions have been regularly set up to propose interventions or reforms, these efforts have had little outcome, with many efforts stalled by the tension between the Executive and Congress and the impacts of COVID-19. Disputes among parties have centered political debates on political and electoral reforms, including restoring the second chamber in Congress, while efforts to address high-level corruption remain muted.

A key contributor to these service problems has been widespread petty and grand corruption. Corruption has thwarted advances in education and health care, public safety, and economic programs and left many rural areas without access to potable water, electricity, or public healthcare (Tegel, 2023). These problems are undergirded by limited disclosure requirements for annual budgets and public tenders and close ties between business and political elites at the subnational level, leading to clientelism (OECD, 2022). As early as 2013, studies carried out by the World Bank revealed that poorer Peruvians dedicated a higher percentage of their income to paying bribes in exchange for accessing basic services to which they are entitled by law than wealthier Peruvians (up to 14 percent, compared with one percent for richer citizens) (Perez & Benevides, 2013).

ANTI-CORRUPTION EFFORTS

Perú's government has committed to addressing corruption problems at times, but these efforts have resulted in minimal reforms in practice. In the late 1990s, Perú subscribed to several anti-corruption commitments, including the Interamerican Convention against Corruption (CICC) in 1997 and the United Nations Convention against Corruption (UNCAC) in 2005. Perú's first National Anti-Corruption Commission from 2001 to 2005 is a good example of the "political cycle" of anti-corruption reforms in Perú, whereby empirical evidence has repeatedly shown that institutional and policy initiatives devolve due to private interests and political circumstances—despite the Government's rhetoric to the contrary (Pozsgai-Alvarez, 2018).

Most of the country's past anti-corruption efforts were initiated by the executive branch, with the country's president ordering ministries and the minister's cabinet to combat corruption, but corrupt bureaucrats failed to hew to reforms. These efforts were widely viewed by citizens as toothless (helping to popularize the phrase "*Roba pero hace obras*"— "He steals but carries out public works"). Citizens and civil society were marginalized as observers, and corruption continued unabated. President Vizcarra also tried to force lawmakers to adopt reforms by introducing party primaries, which led to initial growth in public support, cutting back parliamentary immunity, and banning convicted criminals from office, but he was later himself impeached for alleged bribetaking (Tegel, 2023).

SOCIAL AUDITS

The expansion of social audits, which have gathered and disseminated information about poor service delivery in Perú, has presented a useful tactic for anti-corruption activity *through a sectoral approach*. The country's local chapter of Transparency International (TI), Proética, led the development of citizen-led social audits, reviewing materials and evaluating government and business activities in various municipalities and across sectors, including construction, elections, environmental activities, and the health sector (Proética, 2023). Government actors turned to these citizen-led initiatives when they required information to solve problems related to public dissatisfaction with services shaped by corruption. Laying the groundwork through years of sustained activities, Proética was able to grow its reputation, standing, and networks to position itself as an attractive partner able to contribute to reform agendas when the government sought solutions to public scrutiny.

Proética has grown to be a prominent NGO in the country, expanding its social audits program for over a decade. Established in 2002, Proética was the first Peruvian NGO dedicated exclusively to fighting corruption through activities such as advertisements, petition drives, and commentary in media outlets. In its early years, its focus was as a government watchdog center for government corruption. More recently, as part of its Monitoring Emblematic Cases of Corruption Initiative, Proética has done more to not merely observe but also to inform public opinion about judicial processes and tax investigations related to cases of grand corruption in a "transparent, agile and efficient manner, to prevent impunity" (Proética, 2023).

Proética initially collaborated with Perú's Office of the Comptroller General of the Republic in 2014 but faced roadblocks when the government shut down access. As an alternative to working directly with the government, the organization launched a new approach in 2015 that focused on citizen-led activities in the form of "anti-corruption brigades." These early social audits were organized by a mix of civil society actors and volunteers and were later formalized into Transparency International's Proética Citizen Audits and Open Government program in Perú with the support of funding from the EBRD, Open Society Foundations, and the Hewlett Foundation, among others.

Since 2015, Proética has conducted nine additional initiatives oriented towards civil society observance of public management to identify instances or risks of corruption in public institutions through Proética's Citizen Audit and Open Government Program. It conducts a range of activities, including an annual National Survey on Corruption Perception, co-runs an *Observatorio de Interidad (*Observatory of Integrity) to monitor the implementation of government anti-corruption practices together with several universities and NGOs, and conducts *vendors ciudadanas*, or citizen monitoring groups (or "citizen brigades," a form of social auditing).

These social audits are supported by civil society and built around the work of private citizens with "the goal of involving and mobilizing civil society in the fight against corruption from the exercise to the access to information and citizen observance" (Proética, 2023). They are temporary efforts, typically one-time events. Proética's audits are citizen-initiated, involving a 20-step process to uncover administrative or financial irregularities by examining documents and checking if they comply with the law broadly over four stages: 1) Initiate social audit, 2) Recruit and train, 3) Start the auditing process, and 4): Release findings and follow-up. Despite the country's present turmoil, these initiatives continue to increase in number, serving to remove anti-corruption initiatives solely from the purview of politicians, placing civil society as observers or "watchdogs." Proética, as a result of this bottom-up pressure, has succeeded in incentivizing the highest levels of government to conduct their own social audits.

Proética's first "anti-corruption brigades" were conducted in the *Los Olivos* district in Lima in August 2015 by a small group of volunteers supported by Proética and other organizations. Here, they worked over five days with municipal public officers in "collaboration and goodwill" to check documents and receive complaints (Proética, 2016, p. 6). Over the next six months, they prepared a report, which was delivered to the mayor, outlining corruption they discovered regarding business licenses, building permits, public tenders, public work projects, and other issues and made concrete recommendations. Limitations to the impact of this effort included weak access and elite buy-in for auditing. Incentives were not aligned at that time such that leaders could be motivated to take an interest in the report. Coordinators from the earliest social audit initiatives reported that it was difficult to "get support from public servants from municipalities to gain access to the files linked to the civil society complaints related to corruption cases" (OPALC, 2016).

Despite limited elite buy-in, Proética was able to focus on its data-gathering efforts while waiting for opportunities to arise to better leverage its findings. Despite the limited political impact, the findings helped publicize corruption issues and were disseminated to the public with the support of an informational video that helped reach illiterate populations (roughly 15 percent in rural areas and five percent in cities).[26]

A 2016 TI Secretariat evaluation of Proética (Luft, 2016) found that anti-corruption brigades had the most impact when leveraging ad hoc strategic alliances, for example, with a high-level government Ombudsman, bringing along the involvement of the Asociación Civil Transparencia, an influential local CSO. The Ombudsman offered technical expertise and monitoring support, while Asociación Civil Transparencia brought its networks and citizen engagement management experience. The second area of impact was in information dissemination; Proética successfully developed forms and factsheets, trained and deployed volunteers for file auditing and transparency website usage, and produced dissemination materials such as physical signs and radio material.

Proética's efforts do not assume elite buy-in, as described in Luft (2016, p. 18): "Given the characteristics of local governments in Perú and the political culture, which is generally apprehensive as regards to transparency and access to public information, the theory of change does not assume that the state (in its various levels) will behave as an ally or a partner." Instead, Proética focuses activities on sustained citizen activity aiming that this "may gradually bring about the necessary conditions and

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[26] Video available at https://youtu.be/E3Ma1opoQ1U

incentives for public officials and authorities to become more open to and interested in improving transparency, …favoring a virtuous cycle" (Luft, 2016).

CORRUPTION SCANDALS IN THE INFRASTRUCTURE SECTOR INCENTIVIZED ANTI-CORRUPTION ACTIVITY: THE *LAVA JATO* AND *LOS CUELLOS BLANCOS DEL PUERTO* CASES

High-profile corruption scandals, including two in 2013 and 2018 explored in this section, have helped open windows of opportunity for anti-corruption activities and enabled Proética to gain more access within the government. The government called on Proética's social auditing experiences, albeit in small ways, both to increase the appearance of responsiveness to citizens' outcry and to gather the information that the brigades had found. The scandals have helped increase public awareness and scrutiny and, in turn, incentives for government action on anti-corruption and opportunities for elite buy-in.

The first of these major scandals, the *Lava Jato (Car Wash)* case, unfolded in 2013, when investigators in Brazil began uncovering a massive corruption apparatus within the state-owned oil company, Petrobras, involving company officials and politicians soliciting bribes from construction companies in return for contracts. One of the companies, Odebrecht, which had a presence in Perú dating back to 1979, operated using a parallel accountability office by adding addendums to the initial infrastructure bids. This grew; for example, the Interoceanic Road began from an initial value of $800 million USD to a value of $two billion USD after ten years, with reported bribes of up to two million dollars paid for construction (Proética, n.d.). Related scandals around construction, including Lima's subway (with bribes of up to $eight million USD), impacted three presidential administrations, including former Presidents Alejandro Toledo, Alan García, and Ollanta Humala. The U.S. Department of Justice exposed the Lava Jato case in 2016 as part of a wider global corruption scandal. Marcelo Odebrecht, the former CEO, admitted to paying $29 million USD in bribes to Peruvian government officials between 2005 and 2014.

A second case, the "*Los Cuellos Blancos del Puerto*" (The White Collars of the Harbor) scandal in 2018, was made public by investigative journalists who leaked audio from a police investigation linked to organized crime in the locality of Callao, exposing corruption among high-level officials of the Judiciary, who were involved in "trafficking of influences, criminal organization, passive and active bribery, among others, and the prerogative of the immunity that protected from investigations to the highest authorities of the judiciary system" (IDEHPUCP, n.d.). The leaks caused public outrage, and, in response, the President at the time, Martín Vizcarra, announced the creation of a "consultive commission for the reform of the justice system" in Perú that would be comprised of "leaders and notable professionals, honest, willing to work selflessly for the country" (Vizcarra, 2018).

In both cases, Proética helped contribute to journalistic coverage, gathering information and publicizing data on issues in various sectors, including justice and infrastructure problems, and was prepared when the government later required direct consultation.

In response to these scandals and mounting public pressure, Perú's government created a Commission for reform, inviting Proética to join what still today stands as the country's high-level reform Commission (*Comisión de Alto Nivel Anticorrupción)*. The initial invitation to join this Commission served as a critical moment of expansion for Proética due to the enhanced government buy-in. The Commission included individual anti-corruption champions, former government officials, and those who had participated in social audits, including active members of Proética, and was presided over by anti-

corruption activist Allan Wagner (former Peruvian Ambassador and, at that time, the president of the Association of Civil Transparency).

The results of this effort were mixed but marked a moment when social audits were able to be scaled up to more effectively engage at higher levels of government following years of sustained action. The government allowed some level of access for citizens involved in the Commission, enabling them to gather and provide information, but did not recognize many of their affiliated organizations. The effort was also part of a wider political ploy: President Vizcarra was seeking support for his power and leveraged the Commission as an attempt to gain popularity and favor from civil society in comparison to Congress. In the end, the Commission suggested ten major activities, including Constitutional reform, the promotion of ethics, the creation of a Supreme Prosecutor for anti-corruption and a Council for reform in the Justice system, and merit-based judge and prosecutor selection, among other measures.

Although the fall of President Vizcarra, and later the COVID-19 pandemic, delayed the process, this effort culminated in several major reforms: creating a Head of Control of the Prosecutor's Office, which aimed to offer autonomous oversight of judges, changing to merit-based selection processes for the Council of the High Magistrate for the National Council of Justice, and other reforms within the justice system.

While the Commission did not achieve all of its aims, it was partially effective and offers an example of civil society actors using a window of opportunity for aligning incentives for anti-corruption efforts with elites' incentives, boosted by a corruption scandal, to push forward meaningful reform. It also set the stage for Proética's involvement in future government activities. For example, in the years following the Commission, Proética contributed to the oversight of the national COVID-19 budget allocation and the development of implementation strategies for integrity standards in the management of public infrastructure projects in the regions of Cusco and Loreto (Proética, 2023).

"Peru has experienced some significant progress on administrative burden and e-citizenship over the last ten years, while at the same time seeing four successive presidents indicted for corruption due to an investigation started in Brazil. Furthermore, repeated interventions in the judiciary by successive presidents, despite declared aims of reform, have only added to the politicization and lack of accountability of magistrates. There is high popular demand for good governance in Peru resulting in brand new political parties supporting a reform agenda, but polarization runs high, and a consensual reform agenda is missing."

Corruption Risk Forecast, 2022

COMMENTARY

MOVING THE NEEDLE THROUGH INFORMATION DISSEMINATION AND OPPORTUNITIES FOR ACTION

Poor services and widespread corruption in Perú have shaped an environment where government actors sought, when pressure mounted, to respond to citizens' concerns and to gather information related to corruption unfolding in the country. Social audits offered a solution whereby government actors could quickly draw on Proética's established citizen brigades with existing networks and procedures to be able to quickly gather information about corruption and to improve the appearance of government responsiveness to citizen engagement on corruption.

Before the *Lava Jato* and *Los Cuellos Blancos del Puerto* scandals, investigative journalists, non-governmental organizations, and academics had been on the front lines of exposing corruption in Perú, but were limited to observing, reporting, and denouncing corruption cases. Government officials took little notice of non-governmental entities, and political will to engage was low. But the dawn of highly publicized corruption cases that affected high-level officials within the State—and the rapid reaction of public opinion—have opened a small space for meaningful civil society engagement to improve service delivery.

Proética's expansion from its early audits at the municipal level to later contributing to government monitoring and advice at higher levels illustrates how social audits can be scaled up to have a greater impact. The government's invitation for Proética to play a part in the country's high-level consultative Commission illustrates how the groundwork laid through its initial monitoring activities later paid dividends when the organization helped contribute to recommending ten concrete anti-corruption measures, including constitutional reforms. Proética's later activities, including its contribution to monitoring the country's national COVID-19 budget allocation, further demonstrate how social audits can ramp up their impacts when opportunities emerge for formal and high-level policy processes, even if Proética's ability to effectively stamp out corruption, as a result, has so far been limited.

Proética's expansion over time has been supported by investigative journalists, civil society organizations, and academic institutions such as the Institute for Democracy and Human Rights (IDEHPUCP) of the Catholic University of Perú, which has used its academic units, records, and research capacity to help generate publicly available information. These activities to expose and disseminate information about corruption did not change the environment dramatically, but they did "move the needle" and helped ripen the potential for action when scandals increased opportunities for elites to gather information and, in turn, respond to public scrutiny.

SUSTAINING THE WINDOW OF OPPORTUNITY: THE NEED FOR ONGOING ENGAGEMENT

Despite social audits working to expose and address corruption in Perú at critical moments and with some increasing visibility across higher levels of government, corruption persists, and true reforms have been limited. There remain ongoing reports of corruption at multiple levels, and the accusations against three former Presidents have not helped change public opinion: In 2021, one poll found that "88 percent of Peruvians believed their politicians were corrupt, the highest rate in Latin America and the Caribbean" (González, 2023). As one interviewee reported, the new programs "have not been implemented effectively, and we cannot evaluate nor monitor" (Interview, 01/28/2023).

"To see positive effects, we have to wait until the political situation stabilizes. From then onwards, try to take certain reforms or reach consensus between the different political oppositions".

Walter Albán, Member of the Executive Council of PROETICA, Perú

There is ongoing public pressure for change and continued resistance and instability (due to high political volatility) thwarting progress. Our interviewees stressed that social audits can continue to play a role "in incremental steps forward," both at the local and also, at times, the national level. With escalating political instability in Perú, continued donor and civil society support alongside these attempts to "move the needle" with incremental changes will also be necessary.

ANNEX XI: SUMMARY MATRIX OF ACTIVITIES, LEARNING QUESTIONS, AND INTENDED USE

Table 11. Summary Matrix of Activities

1. What does USAID need to know to account for political-will dynamics in combating corruption?				
Literature Review	**Original Research**	**Emerging, Innovative, and Alternative Approaches**	**USAID Objectives**	**USAID Purpose and Intended Use**
a) What is "political will" for anti-corruption reform?				
Despite early attempts to define and measure through indicators, PW is unique to context, sector, and stakeholders. It must be analyzed with local partners through PW methodologies.	Across case studies, the term was not readily used. Proxy terms for PW are "willingness for real change" and "political incentives."	Recent PW methodologies unpack complex conditions to reveal opportunities to enable, support, or sustain political will, especially within sectors. Local stakeholders should have the capacity and resources to learn about and institutionalize them.	A clear definition to inform indicators of political will and how it can be measured. To define and unpack political will for anti-corruption to usefully inform program design, implementation, and evaluation.	Future political economy analysis guidance for how "political will" should be measured and considered throughout the program cycle. USAID anti-corruption training that is currently under development.
b) How is "political will" assessed, to what degree, and at what level?				
New methodologies, technical guidance, and datasets (e.g., Corruption Risk Forecast) are designed to address PW specifically. Literature asserts these tools should be used throughout the program cycle, not only at program design.	No use of formal assessment by either civil society, institutions, donors, or politicians p of PW across case studies per se. Used ex post to describe complex dynamics in sector or AC reforms. "Willingness for change" and "political incentives."	Innovative approaches to assess PW are uniquely designed to be used for specific purposes or sectors and stakeholders and are scalable regardless of level.	Document methodologies and approaches that assess threats, risks, and opportunities to develop and sustain political will.	USAID and implementing partner thinking on anti-corruption assessment, design, oversight/ implementation, monitoring, evaluation (MEL) Future corruption risk assessment methodologies currently under development by the Anti-Corruption Task Force. USAID anti-corruption training that is currently under development.

1. What does USAID need to know to account for political-will dynamics in combating corruption?				
Literature Review	**Original Research**	**Emerging, Innovative, and Alternative Approaches**	**USAID Objectives**	**USAID Purpose and Intended Use**
c) What factors explain the presence, absence, or degree of political will for a given anti-corruption reform? (e.g., External actors, incentives, emerging sectors)?				
Past literature was limited in understanding nuances of PW. Rather, used ex-post to describe program failure. New literature points to use of PW methodologies to explain opportunities/degree of PW.	**Presence:** Factual and Accessible data Exposure of high-level corruption, usually related to a specific sector, by research and investigative journalism. Change requires a coalition of actors as opposed to individual champion or individual political will. Accompaniment of donor engagement over time to support windows of opportunity. **Absence:** PW lies on a spectrum. Even when PW appears low and corruption high, there are always opportunities for engagement. **Degree:** High-profile scandal (high) Electoral cycle (high) Donor-driven reforms without true local partnership (low) One anti-corruption champion (low)	New PW methodologies can capture presence, absence, or degree and potential windows of op. Must be used by, with, and through local partners.	To determine any variables which impact political will. To demonstrate triggers that explain when political will for anti-corruption reform emerges.	Future learning agendas and related research projects. USAID approaches and programming related to both domestic and transnational corruption.

2. How should **USAID** programming to combat corruption account for and influence political will, particularly where it is weak?				
Literature Review	**Original Research**	**Emerging, Innovative, and Alternative Approaches**	**Objectives**	**Purpose and Intended Use**
a) Can USAID influence political will?				
Typologies, matrices, and technical documents will provide guidance to impact political will through AC programming writ large or through sector-specific programming in emerging AC sectors such as finance, social norms, resource governance, etc. Transparency, social audits, e-governance, and procurement reform are among ten interventions with empirical data to support impacts on anti-corruption.	Across case studies, donor support presented at each window of opportunity: to enable change, to support, or to sustain change. The key factor is to ensure that the timing and type of support are locally driven in terms of sector, scale, and sequence.	Emerging sectors including finance, mis-, and disinformation are key leverage points to influencing PW across stakeholder groups. Contextually appropriate and locally facilitated access to data and information is relevant lower level literacy environments where corruption (as in land and food security) remains problematic.	Highlight strategies exist to increase or maintain political will or prolong the window of reform, and how should these vary because of country context (e.g., fragile states), sector, level (e.g., national, ministerial/sectoral, mid-level, low level), and type of corruption (e.g., petty, grand).	Future guidance for how "political will" should be measured and considered. USAID approaches and programming related to both domestic and transnational corruption. USAID anti-corruption training that is currently under development.

2. How should USAID programming to combat corruption account for and influence political will, particularly where it is weak?				
Literature Review	Original Research	Emerging, Innovative, and Alternative Approaches	Objectives	Purpose and Intended Use
b) What should USAID do when political will is weak?				
Utilize new PW methodologies to identify windows of opportunity and sectors and discern where PW lies on a spectrum. Where PW is low local capacity building in these methodologies can help partners determine priorities and strategic ways forward. Determination of costs /benefits of investing in AC when political will is low.	Apply a "sectoral approach, Defined as targeting a specific policy problem that is important to policy-makers and other key stakeholders and opinion-makers. Facilitate and support partnerships with non-government organizations (NGOs) and quasi-non-government organizations (QUANGOs) to generate local acceptance of the interventions and help steer evidence from the research and pilots into the policy-making process. Invest in supporting ethical journalism and media literacy. Support data initiatives in ways that do not create parallel institutions and foster institutional alignment locally. Anti-corruption in low political-will states has a long gestation process, and long-term accompaniment is vital. Do not expect a short, linear process between the onset of interventions and immediate reductions in corrupt activity. Respond to and support windows of opportunity over the long term. Reform initiatives can lose momentum in a desire to return to the status quo. Reinforce legal frameworks and ability to prosecute crimes related to corruption to reduce cultures of impunity. Collaborate with citizens to increase political will and political pressure by lowering the costs (economic, political, social, legal) to citizens/civil society for collective action.	Innovation in PW methodologies can identify obstacles and opportunities for program development when PW is weak. Partnership and long-term engagement can foster communication for alternative/ new approaches in high-corruption contexts. Anti-corruption champions emphasize combatting cultures of impunity through cross-sector efforts (legal enforcement, media, support of research institutions), communication with other organizations, and groups working toward same sectoral aim. Donors cannot generate or initiate Windows of Opportunity, but the highlighted governance interventions created the enabling environment for change during those key moments by making transparent data available to civil society and journalists, providing evidence of best practices from other settings to policy-makers, and providing funds for program development, implementation, and scaling up.	To document what was effective /ineffective in environments of low political will, and what are the key factors to success or failure.	USAID approaches and programming related to both domestic and transnational corruption. Future learning agendas and related research projects.

2. How should USAID programming to combat corruption account for and influence political will, particularly where it is weak?				
Literature Review	**Original Research**	**Emerging, Innovative, and Alternative Approaches**	**Objectives**	**Purpose and Intended Use**
c) How should this learning be incorporated into the program and project cycle?				
PW is dynamic. PW methodologies should be integrated across the program cycle to monitor for changes in the context. Build capacity with local partners and within programmatic MEL. Evidenced-based learning is needed as it relates to corruption and PW. Programs should capture lessons learned and good practices. Document future learning/ program opportunities within program cycle.	Ensure PW is not curtailed due to fragmentation during program implementation. If implementation creates parallel structures or does build local capacity, PW can stall. High-profile scandals in two case studies created windows of opportunity where donors had a long-term in-country presence. Create space within program cycle for rapid onset or dramatic events to seize upon windows of opportunity. During program design, ensure sectoral approaches facilitated government buy-in to the reform efforts by aligning the interests of politicians and bureaucrats with anti-corruption reforms. All four interventions were augmented by programmatic efforts to put research findings and data on corruption into the hands of journalists and researchers. Media support can bring attention to these corruption stories and generated bottom-up momentum for further reform efforts.	International donors and development practitioners should ensure strategic support at different stages in the policy development and implementation process. DCID team recommends three potential stages where donors can target their activities: 1) problem identification, 2) policy development, and 3) scaling up.	To contribute to training, policy/ strategy, assessment, design, implementation, evaluation, and knowledge management within USAID.	Future political economy analysis guidance for how "political will" should be measured. Future corruption risk assessment methodologies currently under development by the ACTF. USAID anti-corruption training that is currently under development. USAID approaches and programming related to domestic and transnational corruption. USAID and implementing partner thinking on anti-corruption assessment, design, oversight/ implementation, monitoring, evaluation (MEL), and future learning agendas and related research projects,

ANNEX XII: CASE STUDY INTERVIEWEES

The following is a list of persons and organizations interviewed by the DCID team for this learning exercise.

Table 12.   Interviewees

DATE	ORGANIZATION	NAME	TITLE
Case Study Interviews-Mozambique			
June 17, 2022	Institute of Social and Economic Studies (IESE)	Dr Salvador Forquilha	Senior Researcher at IESE
July 5, 2022	Eduardo Mondlane University (UEM, Mozambique)	Dr Mario Falcao	Professor in the School of Agronomy and Forestry. Expert in illicit timber trading
July 18 and August 23, 2022	Mozambique Center for Investigative Journalism	Luis Nhachote	Award-winning investigative journalist, editor and researcher, specializing in organized crime, corruption in the extractive, fisheries, and forest sectors
January 6, 2023	International Institute for Environment and Development Mozambique REDD+	Isilda Nhantumba	Forest Expert involved in design and implementation of REDD+ programming in Mozambique, reforms in forest law, China trade expert
January 20, 2023	Organization Friends of Forest / Amigos da Floresta	Simão Matsinhe	Program Lead
January 17, 2023	National Agency for the Control of Environmental Quality (AQUA)	Mário Parina	Representative, Cabo Delgado
January 16, 2023	Niassa Special Reserve	Anonymous	Park Ranger
January 20, 2023	Oxpeckers International	Estacio Valois	Investigative Journalist
February 1, 2023	Centro de Estudios Estrategicos (Center for Strategic Studies), Mozambique	Rafael Shikhani	Analyst/ Historian

DATE	ORGANIZATION	NAME	TITLE
Case Study Interviews-Peru			
January 17, 2023	Proética	Samuel Rotta	Executive Director of Proética (Peruvian chapter of Transparency International)
January 17 2023	-.-	Anonymous	Formerly worked at the Ministry of Justice
January 18 2023	Ministry of Transport and Communications	Carmen Vegas	Executive Secretary of LEGADO project. Former Head of the National Office of Anti-Corruption.
January 18, 2023	LEGADO Project	Alberto Valenzuela	Former Executive Director of the LEGADO project for the Pan American Games of Lima 2019.
January 25, 2023	ACASUS consultant	María Antonieta Alva	Member of ACASUS consultant. Former Minister of Economy.
January 28, 2023	Catholic University of Perú	Gelin Espinoza	Researcher in areas related to public policy, crime and governance. Consultant in Public Policy with the Ministry of Energy and Mining.
January 29, 2023	EY (Private company)	Camilo Carrillo	Executive director of Infrastructure. A former member in the Competitivity Council in Lima.
February 2, 2023	PROÉTICA	Walter Albán	Member of the Directive Council of Proética.
February 10, 2023	Law firm Benites, Vargas & Ugaz	Liliana Calderón	Lawyer expert in compliance and anti-corruption.
Case Study Interviews-Ukraine			
December 16, 2022	Partnership for Transparency Fund	Lars Jeurling	Adviser
December 29, 2022	United States Institute of Peace	Ambassador William Taylor	Vice President, Europe and Russia
January 10, 2023	Partnership for Transparency Fund	Dirk Mattheisen	President
January 19, 2023	Office of the President of Ukraine	Edem Isliamov	Former Adviser
January 10, 2023	Open Contracting Partnership	Viktor Nestulia	Head of Eastern Europe and Central Asia

DATE	ORGANIZATION	NAME	TITLE
January 10, 2023	ProZorro	Julia Dvornyk	Former Assistant IT Coordinator
January 16, 2023	Centre of United Actions	Oleh Rybachuk	Founder
January 24, 2023	Atlantic Council	Ambassador John Herbst	Director, Eurasia Center
January 31, 2023	DOBRE	Yuriy Kuzko	Senior Consultant on Procurement
January 23, 2023	Balkan Investigative Reporting Network	Jeta Xharra	Editor, Reporter
February 1, 2023	ProZorro	Olexandr Starodubtsev	Founder
February 3, 2023	Ministry for Development of Economy, Trade and Agriculture of Ukraine	Lilia Lakhtionova	Director of the Public Procurement Department
Case Study Interviews-Vietnam			
2/7/2023	United Nations	Fransesco Checci:	Anti-Corruption for SE Asia
2/8/2023	Hanoi International Arbitration Center HIAC,	Pham Thanh Nga	Arbitrator
1/23/2023	Princeton University	Duy Trinh	Data Scientist
1/20/2023	National Assembly	Thiem Bui	Research Director
1/19/2023	ISEAS	Dien Nguyen An Luong	Researcher and Fellow
1/24/2023	The University of New South Wales	Professor Carlyle Thyer	Emeritus Professor

ANNEX XIII. ANTI-CORRUPTION CHAMPIONS

ANTI-CORRUPTION CHAMPION- LUIS NHACHOTE, MOZAMBIQUE

Luis Nhachote is an award-winning investigative journalist from Maputo, Mozambique writing on issues pertaining to corruption for over 25 years. He began his career as a junior reporter with the civil society-based *Savana* weekly. Understanding the prevalence of corruption and conflicts of interest at many levels of Mozambican society, he pursued trainings in the areas of transparency, corruption, electoral systems, and the judiciary, with Transparency International National Syndicate of Mozambican Journalists. He also interned at *Mail & Guardian Centre for Investigative Journalism*. A turning point in his career was his 2006 acceptance to International Visitor Leadership Program—sponsored by State Department of United States of America. He was able to attend workshops with the *New York Times, Washington Post, Philadelphia Inquirer,* and San *Francisco Chronicle.*

Upon returning home, he launched the daily electronic press outlet *Canal de Mozambique* as Deputy Editor. *Canal de Moçambique* is still in operation today. From 2010 – 2013 - he served as a consultant at world renowned Mozambique Centre for Public Integrity (CIP), developing an online database of conflict of interests between politics and business. In 2008, he was awarded a prize on journalism by the National Syndicate of Journalists and VODACOM as a results of the largest investigation on the traffic of drugs in Mozambique. In 2009, he was a finalist in the African journalism competition from the CNN – Multichoice. Between 2008 and 2013 he served on the Board on the Forum for African Investigative Reports (FAIR). Currently, Mr. Nhachote is a freelance investigative journalist for the *Wall Street Journal, Forbes Magazine* (Africa), and *Al Jazeera* where he has written on money laundering, transnational criminal activities, and corruption. He has gained international attention for his work as Chief Correspondent for *The Continent* and *Mail & Guardian* for his in-depth reporting on the violence and insurgency in Cabo since August of 2021. He is based in Mozambique and serves as Executive Coordinator of his country's first Mozambican Center for Investigative Journalism and is member of Africa Network Centers of Investigative Reporters.

ANTI-CORRUPTION CHAMPION- VIKTOR NESTULIA, UKRAINE

Viktor Nestulia leads Open Contracting Partnership's support to Ukraine to reconstruct and modernize the country after Russia's illegal invasion, leveraging the transformational open contracting reforms in Ukraine since 2014 to help the country build back better. He also chairs Ukraine's Reconstruction Integrity, Sustainability and Efficiency (RISE) Coalition, a group of 35+ organizations focusing on embedding open contracting principles and approaches into the recovery program. Viktor works closely with government,

business, and civil society to make sure that Ukraine's reconstruction is a role-model of open government and open contracting for the world. He is also an advisor to Nadiia Bigun, Deputy Minister of Economy responsible for public procurement.

Before joining the Open Contracting Partnership, Viktor was acting CEO at SOE Medical Procurement of Ukraine—the central purchasing body set up by the Ministry of Health of Ukraine for medical public procurement.

Between 2015 and 2018 he was a Program Director at Transparency International Ukraine. His portfolio included five significant initiatives— ProZorro, ProZorro.Salesystems development, DOZORRO community building, e-Health system development, and Construction Sector Transparency Initiative implementation. He has experience in the private sector and in government. He headed the procurement risk assessment division in one of the biggest agro-holdings of Ukraine and worked in the Ministry of Infrastructure of Ukraine. Viktor has a Master's degree in International Economy from Kyiv National Economic University in Ukraine and studied Organizational Behavior and Intercultural Marketing at the Wirtschaftsuniversität Wien in Austria

ANTI-CORRUPTION CHAMPION- WALTER ALBAN PERALTA, PERU

Born in Lima, Perú. He studied Law at the Catholic University of Perú between 1971 and 1977, where he obtained his professional title in 1978. He also has a Master's in Human Rights. He was a professor and former Dean of the Faculty of Law at the Catholic University of Perú, where he was also the Director of the Master of Law with a mention in Jurisdictional Politics. He is a member of the Institute of Democracy and Human Rights from the same University. He served as the Peruvian's people Ombudsman, between November 2000 and September 2005. Between the years 2012 to 2013, he was the ambassador of Perú for the OAS. Afterward, he was the Minister of Interior of Perú until June 2014. When he ended his appointment as Minister of Interior, he decided to work directly in the fight against corruption, the reason for which he accepted to be a member of the Directive Council of Proética, an institution that constitutes the Peruvian Chapter of Transparency International. At the same time, he took over the courses of Ethics and Lawyer's professional responsibilities, and the Ethics Section of the juridic clinic of the Faculty of Law, where he continues developing teaching labors. In the year 2018, and in the context of the scandal produced by legal telephone tapings that were made public—and that showed serious corruption cases that involves Judges, Prosecutors, Congressman, Politicians, and businessmen—he accepted to integrate an independent Commission for a Judiciary Reform, called by the then President Martín Vizcarra.

ANTI-CORRUPTION CHAMPION- PHAM THI THANH NGA, VIETNAM

Pham Thi Thanh Nga is the Head of LTT Lawyers in Ho Chi Minh City, an arbitrator at the Hanoi International Arbitration Center, and an accomplished author on e-governance reform in Vietnam. She has over 14 years of experience in enterprise, investment, and labor law. Before working at LTT & Lawyers, Ms. Nga worked for Berkeley Research Group (BRG), a multidisciplinary consulting firm with many of projects in the fields of real estate and finance. As an attorney and in-house counsel for enterprises, Ms. Nga has successfully supported business owners, clients, domestic and foreign investors in start-up and investment procedures, contract negotiations, work permits and other legal procedures. She has published extensively on legal topics, including the importance of e-governance for reducing bureaucratic procedures and informal charges for businesses.

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