



**USAID**  
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# PRACTITIONER'S GUIDE FOR ANTICORRUPTION PROGRAMMING

**STOP KORRUPSION**



**MOS BENI PAZAR  
ME TE DREJTAT TUAJAI**



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Cover Photo: Albanian poster for USAID-sponsored Citizen Advocate Office: "Stop Corruption. Do not sell your rights!" and Indonesian youth at an anticorruption rally with campaign button: "Indonesia – Clean, transparent, without corruption."

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# ACRONYMS

ADB	Asian Development Bank
ADS	Automated Directives System
BTA	Bilateral Trade Agreement
CSO	Civil Society Organization
CDCS	Country Development Cooperation Strategy
DO	Development Objective
DRG	Democracy, Human Rights and Governance
DRG Center	USAID Center of Excellence in Democracy, Rights and Governance
EAP	East Asia and Pacific
ECOWAS	Economic Community of West African States
E&E	Europe and Eurasia
EG	Economic Growth and Trade
ENGAGE	Encouraging Global Anticorruption and Good Governance Efforts IQC
G2G	Government-to-Government
GRECO	Group of States Against Corruption
IQC	Indefinite Quantity Contract
LAC	Latin America and Caribbean
LG&D	Local Government and Decentralization
MCC	Millennium Challenge Corporation
MENA	Middle East and North Africa
OECD	Organization for Economic Cooperation and Development
OSS	One-stop Shop
PAD	Project Appraisal Document
PEA	Political Economy Analysis
PFM	Public Financial Management
PFMRAF	Public Financial Management Risk Assessment Framework
RFA	Request for Applications
RFP	Request for Proposals
SAI	Supreme Audit Institutions
SCA	South and Central Asia
SSA	Sub-Saharan Africa
TCP	Threshold Country Plan
TI CPI	Transparency International Corruption Perception Index
TO	Task Order
UNCAC	United Nations Convention against Corruption
USAID	United States Agency for International Development
WB	World Bank
WTO	World Trade Organization





# EXECUTIVE SUMMARY

This Guide offers practical programming and implementation advice for USAID field missions to support their development of effective anticorruption programs. The advice is based on lessons learned from past anticorruption programming by USAID, other donors and host governments. Guidance is also provided on the use of political economy analysis tools that can assist practitioners in identifying corruption dynamics, challenges and opportunities for programming, as well as highlighting initiatives appropriate for different sectors. Approaches to developing effective and targeted monitoring and evaluation systems for such programs are also presented in this Guide. All of this is wrapped in the logic of the USAID program cycle.

To date, there are no definitive “best practices” in the anticorruption field. Many anticorruption approaches to reform have been tried by many stakeholders, some resulting in success, some in failure and some in between. But insufficient monitoring and controls limit our current knowledge of what clearly works under different circumstances. This Guide offers examples, tips, advice and illustrative approaches based on the few systematic studies of anticorruption program performance that have been conducted, including one based on USAID programs over the past decade. While not conclusive, their findings can help USAID practitioners consider options knowledgeably and steer clear of approaches that are likely to be unproductive.

The first step in the program cycle is to acknowledge the importance of addressing corruption in most development programming. The USAID Anticorruption Strategy and the USAID Democracy, Human Rights and Governance Strategy both lay out the rationale for how

corruption can negatively impact development initiatives, as well as a country’s democratic, governance and economic futures. These strategies suggest the urgent need for development programmers to assess the extent of corruption risks and entry points for anticorruption opportunities. The goal is to develop initiatives that do not tolerate corrupt tendencies but seek to reduce their impact in all types of programs that they might invade, such as health, education, economic growth, environment, energy, agriculture and others. Sometimes that means designing programs that are exclusively devoted to fighting corruption; other times it means integrating anticorruption interventions into sectoral programs.

When designing new programs, corruption risks should be assessed systematically in the Country Development Cooperation Strategy so that initiatives are properly targeted to reduce corruption challenges. The USAID Anticorruption Strategy and DRG Strategy provide guidelines for incorporating these anticorruption objectives in the CDCS. The USAID Anticorruption Assessment Handbook offers practical guidance to field missions so they can identify the nature of corruption risks in the country, where they exist and how they might be mitigated. The assessment includes five analytical steps and practical tools to implement them: (1) analysis of the legal-institutional framework, (2) political-economic analysis, (3) stakeholder mapping, (4) in-depth diagnostic analysis of corruption vulnerabilities in key sectors and government functions or institutions and (5) review of anticorruption programming track records to assist in making and prioritizing specific programming recommendations.

Anticorruption goals can be pursued through explicit anticorruption programs, but also through sectoral programs that, in part, seek to contribute to greater accountability and transparency. The challenge for programmers is to identify the best ways of integrating anticorruption objectives into those sectoral projects. One approach, through sector-specific diagnostic assessments, is described in this Guide.

Lastly, to build the future knowledge base of effective anticorruption programming, systematic and explicit monitoring and evaluation of USAID interventions need to be designed, reported and collected for analysis. Experience shows that the best indicators are those that directly measure the specific anticorruption interventions through to their outcomes and impacts. Broad and generic anticorruption indicators that exist at the country level have been frequently used in the past, but are not equipped to properly capture the outcomes and impacts of particular interventions.

Theory and research demonstrate that there are many paths that anticorruption reforms can take and their effectiveness depends upon many contextual factors. This Guide reviews what is known about anticorruption programming and provides a set of practical tools to support effective design.

The Guide is organized to offer “how to” advice.

- Section I defines corruption and how it impacts development
- Section II describes USAID’s anticorruption programming efforts over the past 7 years
- Section III identifies how anticorruption efforts fit into the USAID program cycle
- Section IV describes approaches to assess corruption vulnerabilities and identify possible reform options.
- Section V provides a review of lessons learned from past donor and host country anticorruption programs

- Section VI provides an overview of monitoring and evaluation approaches for anticorruption initiatives.
- Section VII offers a summary of the practical tools and tips discussed in this Guide.

# I. CORRUPTION AND DEVELOPMENT

## Global Trends in Fighting Corruption

A global movement to combat corruption has emerged since the mid-1990s. Many initiatives have been implemented by host governments, their civil societies and business communities, regional and international organizations, and international donors to reform laws, institutions and processes, strengthen enforcement, institute preventive measures, and generate greater public awareness about the negative consequences of corruption with varying degrees of success.

Policy reformers in and out of government have created international and regional conventions against corruption. Legal and regulatory frameworks and institutional reforms to counter corruption have been implemented. National civil society and business coalitions have been established, joined by an investigative mass media to create more awareness about the costs of corruption and the benefits of anticorruption programs. Governments and international donors have broadened their approach to countering corruption from enforcement to prevention through governance strengthening and economic restructuring to incorporating anticorruption components into sectoral programs such as agriculture, education, energy and health. More recently, the donor community has focused additional efforts on impact evaluations to discern lessons from experience and identify approaches that may achieve results in different country contexts.

## Defining Corruption

While debates over the definition of corruption continue, many accept Transparency International's definition as "*the abuse of entrusted*

*power for private gain.*"<sup>1</sup> USAID has adopted the same definition in its *Anticorruption Strategy*.<sup>2</sup> While this meaning does not lay out a universal legal standard for specific corrupt actions, it offers a framework within which the norms of each society toward corrupt behavior can be depicted – which practices are acceptable and which are not.

Corruption can exist at a *grand level* involving larger transactions and higher level officials or at an *administrative level* involving smaller transactions and lower level officials, often called *petty* corruption. Grand corruption is manifested, for example, by kickbacks to win large public procurements, embezzlement of public funds, and privatization to insiders at bargain prices. Administrative corruption includes small bribes, skimming paychecks, nepotism in appointments, selective enforcement of taxes, and absentee employees, teachers or doctors. Opportunities, incentives and attitudes shape corruption levels, which can vary across institutions, regions and countries. No form of government is immune to corruption, but countries with weak political and economic institutions are particularly prone to endemic corruption. With partial or fledgling accountability systems, post-conflict countries and transitional regimes often are most vulnerable to corruption.

Attention to the issue has increased, but sensitivities still exist regarding the word "corruption." Some host governments prefer not to use the word and instead describe anticorruption initiatives in terms of transparency,

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<sup>1</sup> Transparency International Plain Language Guide (Transparency International, 2009, 14): [http://www.transparency.org/whatwedo/pub/the\\_anti\\_corruption\\_plain\\_language\\_guide](http://www.transparency.org/whatwedo/pub/the_anti_corruption_plain_language_guide)

<sup>2</sup> USAID Anticorruption Strategy, 2004: [http://pdf.usaid.gov/pdf\\_docs/pdaca557.pdf](http://pdf.usaid.gov/pdf_docs/pdaca557.pdf)

accountability and integrity. In other countries, the political discourse embraces frank treatment of the issue and use of the term. For more readings on corruption in the international development sphere, refer to the resources listed in the Appendix.

## USAID Policies to Address Corruption

As corruption poses a considerable obstacle to development, fighting corruption has become a declared priority for USAID. The *USAID Development Framework for 2011-2015*<sup>3</sup> identified supporting democratic reforms among its core development objectives. The Framework underscored that “Without capable, transparent, accessible, and accountable public institutions, economic growth, broad-based opportunity, and key public services cannot be sustained.” Anticorruption interventions that promote good governance, government transparency and accountability are the tools that can support reaching this objective across all sectors including those that fall within core objectives such as health, economic growth, food security, climate change, humanitarian aid and conflict resolution.

The *USAID Anticorruption Strategy*<sup>4</sup> is a key document providing practical guidance to program officers on how to incorporate anticorruption objectives into USAID programming. The Strategy establishes a framework and multidisciplinary approach to combating corruption “that incorporates political competition, economic competition, social factors, and institutional and organizational performance across all sectors.” It also calls for integrating anticorruption initiatives into all sectoral programs

that may be affected by corruption and focusing democracy and governance and economic growth resources more explicitly on anticorruption targets.

Anticorruption activities also form a key component of USAID’s 2013 *Democracy, Human Rights and Governance (DRG) Strategy*.<sup>5</sup> The strategy lays out four objectives (see Figure 1), one of which is to foster greater accountability of institutions and leaders to citizens and the law.

**Figure 1. USAID’s DRG Strategy (June 2013)**

### **DO 2: Foster greater accountability of institutions and leaders to citizens and to the law**

- 2.1:** Provide electoral assistance that enables citizens to exercise their right to select and replace their leaders through periodic, free and fair elections
- 2.2:** Support the ability of civil society and independent and open media to provide oversight and an informed critique of government
- 2.3:** Strengthen institutions and systems that enable the rule of law, and checks and balances among branches of government
- 2.4:** Assist state institutions at all levels in delivering on the mandates of their offices, fulfilling the public trust, and providing public goods and services through transparent and responsive governance

Under this objective, USAID supports a broad array of programming to strengthen vertical accountability driven by citizens, along with horizontal accountability pursued through state institutions. Strengthened accountability systems

<sup>3</sup> USAID Policy Framework 2011-2015: <http://www.usaid.gov/sites/default/files/documents/1870/USAID%20Policy%20Framework%202011-2015.PDF>

<sup>4</sup> USAID Anticorruption Strategy, 2004: [http://pdf.usaid.gov/pdf\\_docs/pdaca557.pdf](http://pdf.usaid.gov/pdf_docs/pdaca557.pdf)

<sup>5</sup> USAID Strategy on Democracy, Human Rights and Governance, June 2013: [http://www.usaid.gov/sites/default/files/documents/1866/USAID%20DRG\\_%20final%20final%206-24%203%20\(1\).pdf](http://www.usaid.gov/sites/default/files/documents/1866/USAID%20DRG_%20final%20final%206-24%203%20(1).pdf)

can halt the course of corrupt acts and also prevent future transgressions.

Programs to strengthen *vertical* accountability foster competitive multiparty systems (DO 2.1) along with the ability of civil society, business and independent media to provide oversight and an informed critique of government (DO 2.2). Such programs work on the demand side of reform.

Programs to strengthen *horizontal* accountability work on the supply side of reform. They foster the rule of law and checks and balances among branches of government (DO 2.3) along with public sector reforms that reduce opportunities for corruption, increase transparency, and realign incentives (DO 2.4). Public sector reforms include

civil service, public expenditure management and service delivery reforms, as well as reforms of state-owned enterprises, market regulations, property rights, banks and other economic structures (see Figure 2).

**Figure 2. Supply and Demand in Anticorruption Initiatives**



Through these many channels, accountability reforms strengthen institutions in government and society and foster structured competition in politics and the economy.



## II. USAID ANTICORRUPTION PROGRAMMING (2007-2013)

Between 2007 and 2013, USAID implemented several hundred projects worldwide that included anticorruption activities.<sup>6</sup> This section of the Guide offers a description of the range of these initiatives. Some lessons can be learned from the design and implementation of these projects and these are identified below. A subsample of these projects, where sufficient data were available, was analyzed to evaluate their relative success or failure. These findings are presented in Section V.

### Program Overview

Out of several hundred USAID projects that included anticorruption activities implemented in 2007-2013, the East Asia and Pacific (EAP) region had the highest ratio of projects per country (6.1) with **Indonesia**, the

**Philippines** and **Mongolia** accounting for 80% of the total number of projects. The Sub-Saharan Africa (SSA) region had the lowest ratio (1.5) of projects per country, but the projects were more evenly distributed across the regional countries. The country with the largest number of projects across all regions was **Afghanistan**, with 25 projects. Some countries appeared to have no projects that included anticorruption activities, including **Belarus**, **Uzbekistan** and **India**. Although the Middle East and North Africa (MENA) and the South and Central Asia (SCA) region had significantly higher levels of overall funding, the largest portion of these went to **Iraq** and **Afghanistan**. If those two countries were excluded, the funding level would range from US\$24 million per average project in the MENA region to \$5.8 million in the SSA region.

**Table 1. USAID long-term country projects with anticorruption interventions, 2007-2013**

Regions	Number of countries	Number of USAID-funded long-term projects	Total funding (estimate) in million US\$
East Asia and Pacific (EAP)	9	55	\$762
Europe and Eurasia (E&E)	14	62	\$588
Latin America and Caribbean (LAC)	15	40	\$478
Middle East and North Africa (MENA)	7	48	\$2,190
South and Central Asia (SCA)	9	56	\$2,581
Sub-Saharan Africa (SSA)	20	29	\$170
Total:	74	289	\$6,748

\* Note that the total amount in the MENA region includes about \$1 billion allocated for projects in **Iraq** and in the SCA region over \$1.9 billion for projects in **Afghanistan**.

<sup>6</sup> For more detail on findings, see *Analysis of USAID Anticorruption Programming Worldwide (2007 - 2013)*, Svetlana Winbourne and Bertram I. Spector, Management Systems International (MSI), 2014

About 50% of the USAID projects reviewed were implemented through various Indefinite Quantity Contracts (IQCs) including the dedicated anticorruption ENGAGE IQC and the preceding Government Integrity IQCs. The remaining projects were funded through full and open competition and other vehicles. Twenty-two projects were implemented under the Millennium Challenge Corporation Threshold Country Programs (MCC TCP) using various contracting vehicles.

## Entry Points for USAID Anticorruption Programming

There was extensive variation in the country political and economic context across USAID-sponsored anticorruption projects and activities. Direct anticorruption projects and sectoral projects with anticorruption objectives were typically implemented by USAID in countries that were already pursuing anticorruption agendas and democratic reforms. Often such commitments were associated with a country joining an international instruments or convention<sup>7</sup> or were driven by the prospect of the country gaining access to new international funding, such as the MCC Compact program.

Direct anticorruption interventions were typically implemented by USAID in countries already pursuing anticorruption agendas and democratic reforms. Programs implemented without the political will of host governments and with limited consultations often faced challenges and delays.

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<sup>7</sup> For example, the UN Convention Against Corruption, Group of States against Corruption (GRECO), African Union Convention on Preventing and Combating Corruption, Economic Community of West African States (ECOWAS) Protocol on the Fight Against Corruption, the Inter-American Convention Against Corruption, ADB-OECD Action Plan for Asia-Pacific, and the most recent Open Government Partnership initiative.

## Infusing Anticorruption Objectives into USAID Sectoral Programming

Calls for proposals that are very clear and directive about their anticorruption objectives can help guide program design by implementers. But analysis showed that only a few calls for proposals for sectoral projects

RFPs/RFAs/TOs rarely required integrating anticorruption into sectoral programs. A majority of sectoral programs did not incorporate anticorruption activities in their objectives and did not measure the impact of these activities on corruption.

included anticorruption as either an explicit objective or a cross-cutting theme. Some calls were specific and directive in their requirements to address corruption, but only a few offered illustrative activities, described clear requirements to address corruption and measure impact, or included corruption-related evaluation criteria for proposals. On the other end of the spectrum are the majority of calls for proposal that did not discuss corruption at all or limited their requirements to a brief discussion of corruption as it may affect the project's central activities.

Most of the calls for proposals for MCC Threshold Country Programs were issued for countries with low scores on the World Bank's Control of Corruption index and are good examples of how to incorporate anticorruption objectives into programs regardless of sector. Aside from these MCC TCPs, there were several other good examples of integrating anticorruption into sectoral programs, including the **Iraq** National Capacity Development (Tatweer)<sup>8</sup>, **Moldova**

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<sup>8</sup> Iraq National Capacity Development (NCD) Program. RFTOP 267-06-004, April 2006.



Business Regulation, Investment, and Trade (BRITE)<sup>9</sup>, and **Serbia** Local Economic Development Activity (LED)<sup>10</sup> projects.

Overall, anticorruption objectives were rarely included in USAID calls for proposals for sectoral projects or, if included, they did not filter down to the projects components or activity descriptions, were not required for impact measurement, and were not included in the evaluation criteria for proposal selection.

## Measuring Program Impact on Corruption

Many projects have had activities that could lead to preventing or reducing corruption. But the majority of these projects did not monitor their activities explicitly through an anticorruption lens and did not set targets to document their impact on corruption. For instance, the **Liberia** Governance and Economic Management Assistance Program (GEMAP)<sup>11</sup> instituted processes that could reduce the opportunities for corruption in the budgeting process, public procurement, and natural resources concessions, but failed to measure their impacts on corruption.

Those few projects, mostly MCC TCP, that specifically measured anticorruption impact

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<sup>9</sup> Moldova Business Regulatory, Investment, and Trade Environment Program (BRITE) (2012-2017). RFP: [https://www.fbo.gov/index?s=opportunity&mode=form&id=21199ef678931a435f28f0ca9e574deb&tab=core&\\_cview=1](https://www.fbo.gov/index?s=opportunity&mode=form&id=21199ef678931a435f28f0ca9e574deb&tab=core&_cview=1)

<sup>10</sup> Serbia Local Economic Development Activity (LED), RFP 169-10-006: [https://www.fbo.gov/?s=opportunity&mode=form&tab=core&id=ab04f9721418745e7db5968e23a4f1e1&\\_cview=1](https://www.fbo.gov/?s=opportunity&mode=form&tab=core&id=ab04f9721418745e7db5968e23a4f1e1&_cview=1) and <https://www.fbo.gov/utills/view?id=2a769e517381d10d60fa5dcebfc6ac3>

<sup>11</sup> Liberia Governance and Economic Management Assistance Program (GEMAP) (2006-2010). Final Evaluation: [http://pdf.usaid.gov/pdf\\_docs/PDACR798.pdf](http://pdf.usaid.gov/pdf_docs/PDACR798.pdf)

showed good results. They constructed indicators that were tailored to the interventions. For example, the **Ukraine** MCC TCP program<sup>12</sup> reported reductions in corruption in university admissions after standardized tests were introduced and in business licensing and land leasing when one-stop shops were established. Similarly, **Albania**'s MCC TCP-1 (MCCA-1) program<sup>13</sup> reported decreases in bribery in business registration at the centers supported by the project, decreases in the value of gifts expected to secure government contracts, and decreases in perceptions of corruption in tax collection and procurement. There are also good examples beyond the MCC TCP programs where corruption impact has been measured effectively. For instance, **Georgia**'s Judicial Administration and Management Reform (JAMR)<sup>14</sup> project resulted in decreases in bribery in the pilot courts and increases in citizen satisfaction with the courts.

Sectoral programs rarely measured their impact on corruption. Often, they made assumptions that their interventions reduced or contributed to reducing corruption without any measurable evidence.

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<sup>12</sup> Ukraine MCC TCP (2006-2009). [http://www.mcc.gov/pages/countries/program/ukraine-threshold-program; Trade, Investment, and Business Acceleration \(TIBA\) \(2006-2009\). – Final Report:](http://www.mcc.gov/pages/countries/program/ukraine-threshold-program;Trade,Investment,andBusinessAcceleration(TIBA)(2006-2009).-FinalReport:) [http://pdf.usaid.gov/pdf\\_docs/PDACQ085.pdf](http://pdf.usaid.gov/pdf_docs/PDACQ085.pdf); [http://pdf.usaid.gov/pdf\\_docs/PDACN921.pdf](http://pdf.usaid.gov/pdf_docs/PDACN921.pdf); [http://pdf.usaid.gov/pdf\\_docs/PDACQ648.pdf](http://pdf.usaid.gov/pdf_docs/PDACQ648.pdf)

<sup>13</sup> Support to Albania's Millennium Challenge Account Threshold Agreement (2006-2008), Final Report, 2008: [http://pdf.usaid.gov/pdf\\_docs/PDACM504.pdf](http://pdf.usaid.gov/pdf_docs/PDACM504.pdf).

<sup>14</sup> Georgia Judicial Administration and Management Reform (JAMR) (2007-2011). Final Report, 2011: <https://sites.google.com/a/usaid.gov/drg/home/about-1/drg-center-teams/governance-and-rule-of-law/anticorruptionmapping>

Some projects used global indices, such as the TI Corruption Perception Index (CPI), the Freedom House Nations in Transit Corruption score, and the World Bank Control of Corruption indicator. While these projects may have contributed to changes in these indicators, it is not possible to directly associate particular initiatives with changes in such broadly based measures. MCC TCP programs that used these indicators extensively up until a few years ago concluded that they “are not a satisfactory means of measuring program impact, and movements in indicator scores cannot be directly attributed to threshold program interventions.”<sup>15</sup>

## Program Areas and Interventions

Across all regions, the overwhelming majority (about 75 percent) of the long-term USAID projects with anticorruption activities fell into the Democracy, Human Rights and Governance area (DRG). The second largest group, although significantly smaller, were projects in the Economic Growth and Trade area (around 16 percent). Many fewer projects were in other areas, such as Working in Crises and Conflict, Environment and Global Climate Change, Global Health, Agriculture and Food Security, and Education, Gender Equality and Women's Empowerment, and Science, Technology and Innovation.

Among different types of anticorruption interventions, rule of law activities made up the largest number, with more than 20% of the total number of activities. The next most frequent type of intervention were civil society initiatives, followed by legislative strengthening, and local government and decentralization. Explicit anticorruption interventions constituted less than one-tenth of all program interventions. Projects in

such areas as environment and natural resources, food security and agriculture, health, trafficking in persons, and disaster recovery rarely incorporated anticorruption objectives.

## Explicit and Sectoral Projects

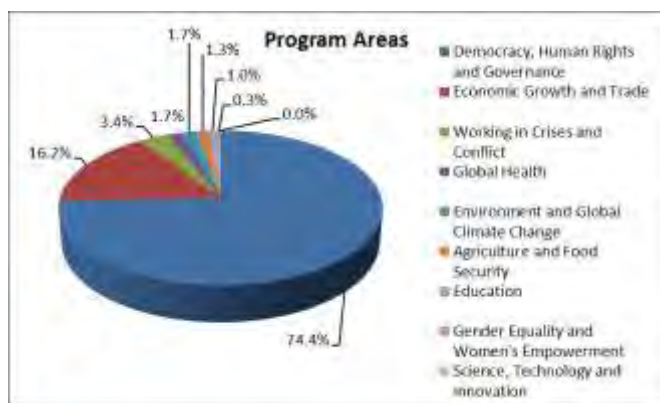
Descriptions of the types of programming activities in each of these program areas are described in the paragraphs below.

### Explicit Anticorruption Projects

USAID's explicit (or direct) anticorruption programming between 2007 and 2013 was largely focused on a pragmatic approach of supporting established independent accountability agencies and helping them develop and implement policies, procedures and systems to enhance government accountability and control corruption. These interventions included support for income and asset declaration management systems, political party and election finance monitoring systems, corruption complaint management systems, and conflicts of interest management systems, among others. Sectoral projects were also tuned to design and implement systems to improve efficiency and transparency of government operations and service delivery. Particularly, e-government systems (e-procurement, e-customs, e-trade, etc.) were typical interventions in many EG programs. Case management systems and court automation constituted a large segment of activities in rule of law programming. One-stop shops were frequently used to reduce corruption vulnerabilities in the delivery of public services.

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<sup>15</sup> Congressional Budget Justification for FY 2012: <http://www.mcc.gov/documents/reports/mcc-fy2012-cbj.pdf>



Many projects promoted good governance standards in governmental operations to enhance professionalism, transparency and accountability. Although legal drafting, including legislation directly related to anticorruption (whistleblower protection, money laundering, conflicts of interest, etc.), remained a frequent activity in many projects, USAID tended to focus on the implementation and enforcement of laws. Projects supported the strengthening of democratic principles in policy development at all levels of the governance, particularly at the local level, institutionalizing citizen participation in decision making processes. Civil society and media projects evolved from supporting public awareness campaigns to more sophisticated activities including citizen watchdog and advocacy initiatives. Social media and crowdsourcing was increasingly used by civil society and the media. All anticorruption and many sectoral projects included civil society components or activities as integral parts of their projects.

### MCC Threshold Country Programs

MCC Threshold Country Programs made significant contributions to anticorruption programming by placing anticorruption objectives at the center of their activities for countries that failed on the World Bank Control of Corruption indicator in their pursuit of MCC Compact status. These MCC TCP projects, more than many others implemented by USAID, designed their activities around the specific goal of reducing corruption in the sectors they worked in, including economic

development, education, health, the justice system, trade, and others. MCC TCPs were also very consistent in developing customized project-specific indicators to measure the impact of corruption interventions.

### Economic Growth and Trade

USAID projects in the Economic Growth and Trade (EG) area that included anticorruption interventions constituted slightly over 16 percent of all reviewed projects. The most common interventions provided equal access to economic opportunity and improved the business-enabling environment. Activities to improve public procurement, public finance management, streamline business registration and licensing (including establishment of *one-stop shops*), tax collection and customs functions related to export/import operations were frequent in many programs. E-government tools were very popular in the EG sector, including e-procurement, e-tax, and e-customs. Some projects supported harmonizing local legislation and practices with WTO and other international standards based on the assumption that they should lead to reduced corruption. A majority of all MCC TCP projects implemented some activities in the EG area.

### Public Administration

In the Public Administration sector, improving public financial management systems, public procurement and public property management; strengthening professionalism; implementing merit-based recruitment, personnel management, performance standards administrative systems; and introducing and enforcing ethics and conflicts of interest management systems are among key interventions used to reduce opportunities for corrupt behavior by public officials. Other types of corruption preventive measures include increasing government transparency by making information available to the public via information desks, websites, and public meetings. Government accountability to the public can be promoted by

involving citizens in policy development and decision making processes, for example, through public consultations on major legislation, public councils affiliated with various governmental agencies, and public oversight of budgeting and procurement decisions.

## Local Government and Decentralization

Local Government and Decentralization (LG&D) projects were the fourth largest group of projects with anticorruption interventions. The most common anticorruption themes of these projects are improving local government performance, accountability and transparency in policy development and service delivery, and promoting citizen participation in decision making. Specific initiatives were targeted at supporting the decentralization process, including legal drafting and institutional strengthening in implementing reforms. Other projects sought to reduce corruption by strengthening local government institutions (including budgeting, financial management, tax collection, etc.) and service delivery, and by involving citizens in decision-making processes. Typically, LG&D projects work on both the supply and demand sides. On the demand side, in addition to mobilizing communities to actively participate in local policy development and governance, the projects also often support civil society watchdog activities to monitor public service delivery using such tools as social audit and report cards. Overall, about 70 LG&D projects or activities within projects were implemented in more than 40 countries.

## Rule of Law

Rule of law projects comprised the largest group of projects that included anticorruption interventions in all six regions. Activities ranged from strengthening the independence of the judiciary to legal education, improving professionalism in the justice system, building the legal framework, establishing anticorruption

institutions within the justice system, building capacity to investigate and prosecute corruption, increasing court transparency by making information about justice system operations and court decisions publicly available, engaging civil society in watchdog activities thereby enhancing court accountability, enforcing codes of conduct, modernizing courts and implementing e-government solutions, implementing modern court administration systems, and bringing country justice systems in line with global anticorruption standards set by international instruments.<sup>16</sup> All of these activities could translate into reduced corruption both within and outside the justice sector if measured, although few projects in fact measured such impact.

## Civil Society, Media, and Private Sector

More than half of the projects identified for this study had activities which promoted civil society and media participation in the anticorruption agenda by organizing civil society around anticorruption reforms and providing support to CSOs and the media to conduct advocacy, watchdogs, legal assistance, and public awareness and education activities. Some projects worked exclusively with the mass media to stimulate and support investigative reporting. Sectoral projects with civil society components most typically involved CSOs in conducting public awareness and education activities, although some supported watchdog activities as well. Overall, CSOs became proactive and effective in monitoring public budget formulation and expenditures, procurement, the judiciary, public service delivery, and other governmental operations. These activities demonstrated success in advocating for anticorruption reforms and participating in policy decision processes. CSOs became more sophisticated in conducting public awareness and

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<sup>16</sup> Reducing Corruption in the Judiciary. Office of Democracy and Governance USAID Program Brief, 2009: [http://pdf.usaid.gov/pdf\\_docs/PNADQ106.pdf](http://pdf.usaid.gov/pdf_docs/PNADQ106.pdf)

education activities using a wide spectrum of approaches ranging from traditional pamphlets to public fairs, production of radio and television shows, and using social media and crowdsourcing. USAID increasingly supported civil society and media projects through direct grants. Unlike projects working with the government, the impact of civil society projects was often measured by changes in societal behavior. This includes changes in citizen tolerance for corruption and a reduction in initiating bribery or exchange of favors, among others.

## Healthcare

Although there were many projects in the healthcare sector, only a few pursued goals of reducing corruption. Nevertheless, many interventions to strengthen health systems and health governance likely strengthened the anticorruption environment, improved transparency and accountability, reduced fraud, and led to reduced corruption. The most common activities included implementing health information systems and standard operating procedures, improving the healthcare regulatory environment, implementing reforms in procurement, warehousing and distribution of drugs and equipment, financial and resource management, improving monitoring of fees and expenses in local health centers, conducting public education, and enhancing citizen participation and oversight.

## Other Sectors

Anticorruption interventions in such sectors as Elections, Education, Disaster Recovery, Food Security and Agriculture, and some others were rather infrequent. Overviews and examples of anticorruption interventions related to Combating Cross-Border Crimes, the Environment and Natural Resources, and some other sectors can be found in the regional and sectoral reports provided in Annex 3 of the Analysis of USAID Anticorruption Programming Worldwide (2007-2013).

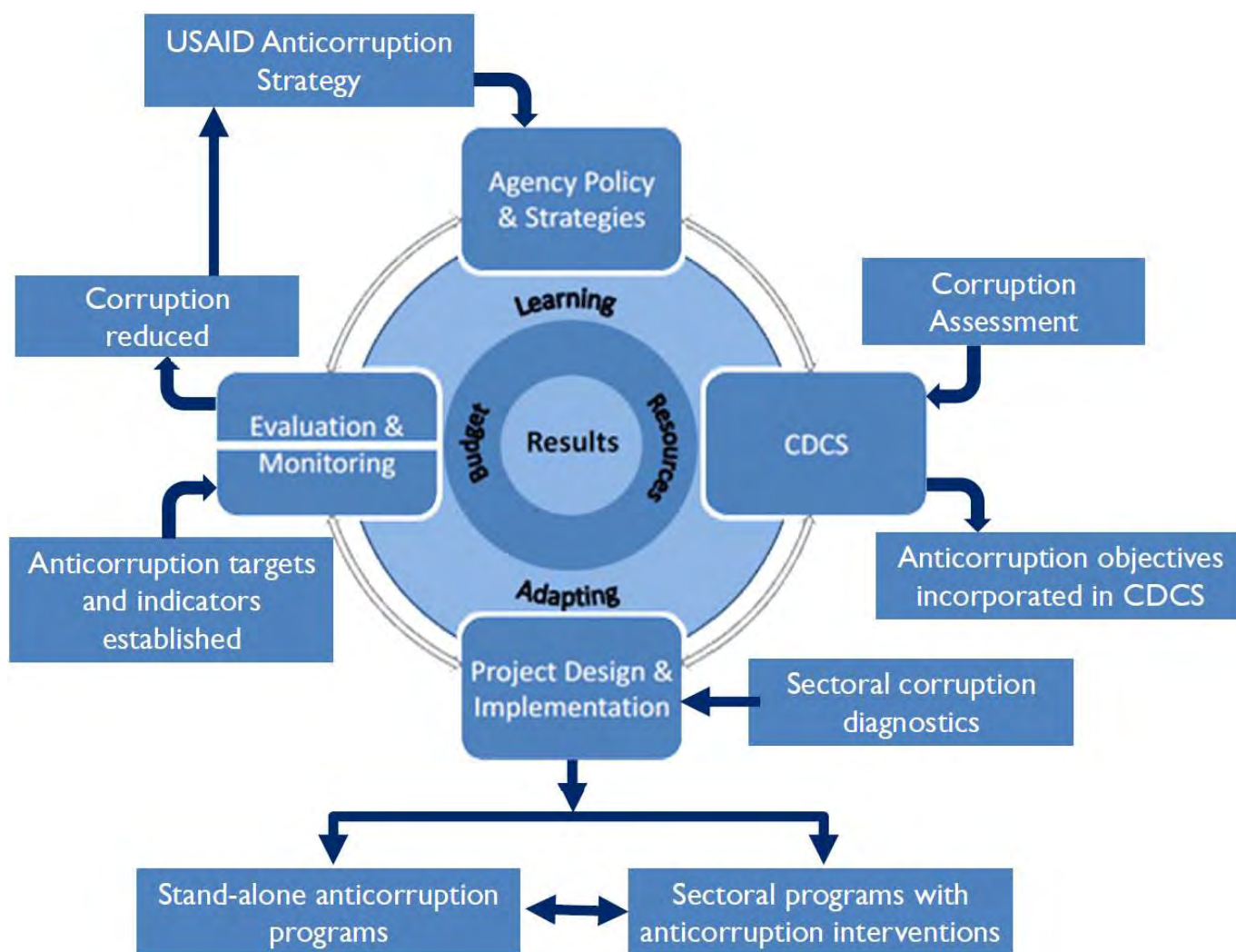


### III. INTEGRATING ANTICORRUPTION INTO THE USAID PROGRAM CYCLE

The USAID Anticorruption Strategy and the USAID DRG Strategy emphasize the importance of incorporating anticorruption programming

into each step of the USAID program cycle. Figure 3 visualizes how this can be accomplished.

**Figure 3. Incorporating Anticorruption in the USAID Program Cycle**



## Incorporating Anticorruption in the Country Development Cooperation Strategy (CDCS)

To comply with key USAID policies that recommend consideration of anticorruption issues in USAID programming, the starting point is the development of the CDCS at the beginning of the country mission planning process as outlined in the ADS 201.<sup>17</sup> Corruption issues and their impact on country development and programming should be outlined in the CDCS's development context and described among challenges and opportunities over the next five years.

Each step of CDCS development -- consultations, development of the results framework, and drafting the strategy -- needs to look at corruption as a cross-cutting factor that can be a critical constraint or risk that requires clear definition and assessment in the CDCS. The political economy analysis (PEA) of corruption's impact on development goals using diagnostic assessment tools (see Section IV of this Guide) can highlight where, how, with whom and when anticorruption initiatives should play a role in the CDCS. Although reducing corruption might not be the priority by itself in a CDCS, embedding anticorruption sub-objectives in sectoral programs might advance overall CDCS goals. By incorporating anticorruption objectives in the results framework at the level of Intermediate Results, it ensures that they will become part of the project design process and can secure adequate resources to effectively address corruption problems either as stand-alone or cross-cutting interventions within sectoral projects.

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<sup>17</sup> USAID, ADS Chapter 201, revised September 30, 2013 (accessed February 20, 2014 at: <http://www.usaid.gov/sites/default/files/documents/1870/201.pdf>)

## Incorporating Anticorruption in the Project Design Process

Anticorruption should be integrated into all stages of the project design process including the conceptual stage, the analytical stage, and the approval stage to ensure that the design process is informed by the best evidence available and supported by analytical rigor as required by the USAID Project Design Guidance<sup>18</sup> and the ADS Chapter 201 Planning.<sup>19</sup>

### **Integrating anticorruption into health reform project design: Albania**

In 2010, USAID/Albania implemented a five year project entitled the "Enabling Equitable Health Reforms." In its planning documents, the mission identified informality and corruption, among others, as challenges that limit the capacity of the Albanian health care system to provide quality care to its citizens, especially the poor. To successfully address these challenges, the program design included goals and initiatives to install a culture of lawfulness. In part, this entailed removing administrative barriers that can encourage corrupt behaviors in service delivery, and revising regulations and enforcement to strengthen checks and balances in healthcare operations.

The design process begins with development of the project concept, where the problem is clearly defined, stakeholders are analyzed, and available knowledge, research and lessons learned are reviewed, all seeking to satisfy the CDCS' goals. In the project design phase, a range of feasible options are identified, analyzed, compared,

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<sup>18</sup> USAID Project Design Guidance, Washington, DC: USAID, December 9, 2011 (accessed February 20, 2014 at: [http://pdf.usaid.gov/pdf\\_docs/PDACS686.pdf](http://pdf.usaid.gov/pdf_docs/PDACS686.pdf))

<sup>19</sup> USAID, ADS Chapter 201, revised September 30, 2013 (accessed February 20, 2014 at: <http://www.usaid.gov/sites/default/files/documents/1870/201.pdf>)



evaluated and prioritized to yield interventions that are likely to be effective in achieving the strategic objectives. To ensure that anticorruption is properly addressed in the project design, it is advisable to include an anticorruption or governance specialist from the mission's DRG office when available.

As the project design is required to be based on analytical rigor it is critical to include assessments of the corruption impact in reaching CDCS objectives and IRs. For example, if designing a health or an education program corruption vulnerabilities and risks should be assessed as directed by USAID project planning and design directives. The USAID corruption assessment framework described in the next section provides practical tools for conducting this analysis and offers a rationale for setting priorities and choosing approaches during the project design process.

Addressing anticorruption in the Concept Paper and Project Appraisal Document (PAD) will safeguard that anticorruption is not overlooked in the following project design stages and that the impact of the project on corruption will be monitored and measured to support overall project goal and objectives. For example, if the new project design is focused on an objective of improving the delivery of primary health services, the design process should ensure that corruption (e.g., bribery, embezzlement, kickbacks, etc.) does not undermine the provision of services. This can be achieved by including interventions to make service delivery more transparent and to strengthen the financial accountability of service providers.

The USAID Anticorruption Strategy suggests approaches for programmatic responses to grand and administrative corruption in sectoral programs, and explores entry points under specific environments as depicted in Figure 4. Where political will is questionable, for example, USAID missions can opt to support less

politically sensitive measures to improve efficiency in government operations. Interventions such as streamlining administrative procedures, reducing trade barriers, and instituting public auctions may be viewed as non-threatening by local stakeholders, and can provide an initial opening to anticorruption programs. Support to civil society and the media in advocating for anticorruption reforms and conducting public awareness and watchdog activities may also be politically feasible in this context. Likewise, initiatives to improve efficiency and transparency of service delivery may be viable entry points for anticorruption initiatives embedded in sectoral programs.

**Figure 4. Corruption Dynamics and Access Points for Response (from USAID Anticorruption Strategy)**



Understanding and assessing the risk of corruption in a given sector and its implication for sectoral program is a critical step in integrating anticorruption in program design. The sector-based Corruption Diagnostic Guide of USAID's Anticorruption Assessment Handbook described in the next section can be an instrumental tool for pinpointing corruption vulnerabilities and the need for specific interventions for sectoral program. The Guide currently consists of detailed diagnostic questions for 19 sectors that allow policies, procedures and practices in a particular sector or function of government to be assessed. Questions are also included to examine corruption vulnerabilities and assess the capacity

and readiness of civil society organizations, the business community, and the media to contribute to anticorruption efforts. The Diagnostic Guide can be expanded or modified and similar sets of diagnostic questions can be developed for other sectors and function as needed. Often, anticorruption programming in a particular sector is possible if there is sufficient political will within the sector, even if political will for such programs in the central government is weak. It is important to find the champions of reform, support them and work with them.

In addition to integrating anticorruption within sectoral programs, the mission may consider establishing standalone direct anticorruption programs that specifically focus on reducing corruption across sectors. Direct anticorruption programs can be designed to work with either domestic government, civil society or both. Critical for initiating a direct program with government is a demonstrated commitment to anticorruption reforms at the highest level of government and throughout government. When there is only limited commitment on the government side, the program should consider focusing on the demand side, working with civil society, the media and the business sector to build their capacity to promote reforms.

Anticorruption programs that are designed with the host government as key counterpart can take many forms, ranging from assisting in the development of national policies such as anticorruption strategies and plans; improving anticorruption legislation; strengthening the capacity of dedicated institutions such as anticorruption commissions/agencies, supreme audit institutions, the Ombudsman, an Access to

Information Commission and other similar institutions; and supporting specific anticorruption reforms across the government, for example, improving government transparency by implementing freedom of information legislation, strengthening controls by implementing asset declaration policies, and enabling corruption reporting through whistleblower legislation, among others. Such targeted government interventions should be supplemented with demand side engagement to foster meaningful dialogue, partnership and advocacy for reforms, and to promote effective citizen oversight to keep government accountable.

When the commitment of government is questionable or weak, it may be appropriate to consider designing a program where civil society is the key counterpart. Civil society anticorruption programs should be carefully aligned with the country's political environment to achieve maximum results. For example, in a country with a repressive government, it is not advisable to promote civil society engagement in massive public anticorruption campaigns, but rather to promote stronger civil liberties, a free and independent press, and honest elections. Within an environment where government is more collaborative, civil society anticorruption programs can be more robust.

Based on the findings of a corruption assessment and analysis of past programming experience, USAID officers should be able to identify priority corruption issues that need to be addressed along with entry points, strategic goals and specific program interventions to address them.

## IV. ASSESSING CORRUPTION

Although corruption assessments are not mandatory within USAID, unlike for gender and biodiversity concerns, conducting such corruption assessments periodically would provide evidence with which to identify appropriate strategic directions and programming interventions at the planning stage. It also provides an opportunity to analyze the political economy of the host country to identify laws, regulations, processes, institutions and cultural practices that promote corruption and, hence, may impede or threaten other development initiatives.

Tailoring anticorruption strategies and interventions to the specific context is paramount for effective programming. Developing an effective programming strategy rests on careful consideration of the information generated through an assessment. This information can point to corruption issues that are most problematic, institutional weaknesses, political-economic dynamics that promote them, and the opportunities and constraints for reform.

Broad political economy dynamics can shape the corruption environment in a country. In particular, the concentration of political or economic power usually increases corruption.<sup>20</sup> Where political power is concentrated in undemocratic regimes, government leaders may act with impunity and put state power to personal use (often referred to as *state predation*); where economic power is concentrated, business oligarchs may capture state laws and policies through payoffs (often called *state capture*). Thus, reforms that increase competition in political and economic structures

are critical elements in a comprehensive strategy to reduce corruption.

### USAID's Anticorruption Assessment

USAID's Anticorruption Assessment Handbook is based on the political economy analysis of corruption to help guide programming. This approach leads users through several steps to assess how corruption manifests itself in a particular country, the political-economic dynamics that facilitate corruption, institutional weaknesses and vulnerabilities, and opportunities for reform. This assessment leads practitioners from problem identification to possible programming responses. In conducting an assessment, USAID Missions can draw on the framework and tools laid out in USAID's *Anticorruption Assessment Handbook*. The assessment framework provides practical tools for conducting the analysis and offers a rationale for setting priorities, choosing some approaches and rejecting others. While a quick reference summary of these steps is provided here, the full text of the handbook is available at:

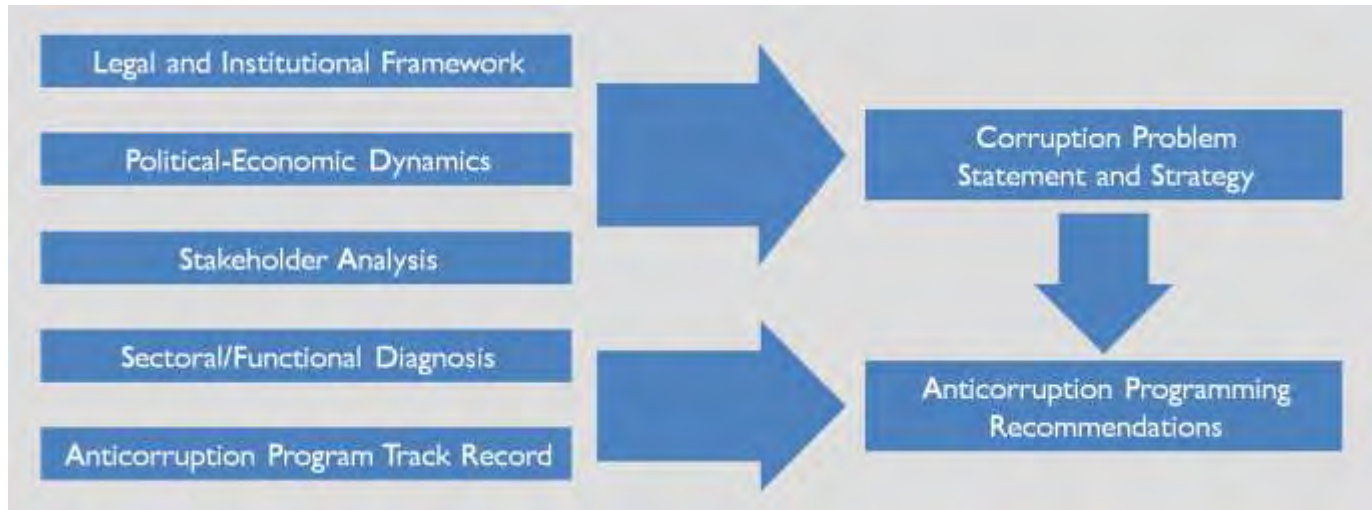
[http://pdf.usaid.gov/pdf\\_docs/pa00jp37.pdf](http://pdf.usaid.gov/pdf_docs/pa00jp37.pdf) .

USAID's corruption assessment framework outlines key tasks that build a detailed analysis of the country's corruption problems and lead to programming recommendations to address them (see Figure 5). The assessment includes five types of analysis that constitute two phases of the assessment: (1) analysis of the legal-institutional framework, political-economic dynamics, and stakeholders that leads to outlining strategic approach in addressing corruption, and (2) in-depth analysis of corruption vulnerabilities in key sectors and government functions or institutions, and review of the anticorruption programming experience that assists with specific programming recommendations.

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<sup>20</sup> Jakob Svensson, "Eight Questions about Corruption." *Journal of Economic Perspectives* (2005) 19: 19–42: [http://www1.worldbank.org/publicsector/anticorrupt/Svensson%20Eight%20Questions%20About%20Corruption%20\(JEP%20Vol%2019,%20No%203%202005\).pdf](http://www1.worldbank.org/publicsector/anticorrupt/Svensson%20Eight%20Questions%20About%20Corruption%20(JEP%20Vol%2019,%20No%203%202005).pdf)

**Figure 5. From Understanding to the Problem Definition to Programming**



### **Step 1 - Legal-Institutional Framework**

**Analysis.** Analysis of the legal-institutional framework examines the formal provisions for fighting corruption, the state of their implementation, and any gaps and deficiencies in the anticorruption regime. Weaknesses in the legal-institutional framework point to possible targets of reform. An annex to the assessment handbook provides a set of questions to guide the analysis. Mirroring the UN Convention against Corruption (UNCAC), the categories covered by the analysis include: national strategies and plans, enforcement laws and institutions, prevention laws and institutions, cultural dimensions, international cooperation, and compliance with international legal instruments.

### **Step 2 - Analysis of Political-Economic**

**Dynamics.** While knowledge of the strengths and weaknesses of laws and institutions is necessary for diagnosing corruption problems and proposing solutions, it is not sufficient. Understanding the dynamics of political and economic power alongside the laws and institutions is equally essential for developing a strategy to address the problem. This analysis looks at the way people pursue, use and exchange wealth and power in particular contexts and the

kinds of corruption problems that typically emerge.<sup>21</sup>

One approach to assess corruption through political economy analysis is to understand the dynamics of *corruption syndromes* in a country.<sup>22</sup> A corruption syndrome is a distinctive and complex pattern of corruption problems reflecting the ways people pursue, use and exchange wealth and power, as well as the political and economic institutions that facilitate and/or impede those processes. By uncovering a country's corruption syndrome, analysts can identify the underlying causes of corruption and, thereby, how to minimize their effects.

Syndromes are shaped by long-term political and economic developments a country has experienced, as well as by more recent influences and events. For example,

<sup>21</sup> USAID/DCHA/DRG is currently developing training on political economy analysis that might be useful for practitioners in the field designing anticorruption programs.

<sup>22</sup> For more on using corruption syndromes, see USAID Anticorruption Assessment Handbook, [http://pdf.usaid.gov/pdf\\_docs/pa00jp37.pdf](http://pdf.usaid.gov/pdf_docs/pa00jp37.pdf); also see Michael Johnston, *Syndromes of Corruption: Wealth, Power and Democracy* (Cambridge University Press, 2005).

- The nature and spread of corruption in established democracies with reputable political and economic institutions are likely to be of a different nature (and to be coped with differently) than in countries in a transitional stage of democratization with political institutions that are not firmly in control and markets that operate primarily in the informal sphere.
- Other countries might be characterized by excessive collusion among political and economic elite, thereby weakening governance institutions, reducing the rule of law, and limiting the independence of the judiciary to provide adequate checks and balances. In these countries, anticorruption reforms must seek to increase political and economic competition in various ways to reduce the overall influence of these controlling elite networks.
- Yet other types of countries might be dominated by a ruler, inner circle or family, where personal power and loyalties operate systematically to weaken democratic and institutional capacity. In these countries the elite plunder the state with impunity. Anticorruption reforms here often need to be aimed at mobilizing the press and citizen groups to gradually develop meaningful political competition and accountability mechanisms.

To use this syndromes approach, analysts need to assess how power and wealth are typically used in the country, how the political and economic institutions have developed, and the extent of participation by citizens in the political and economic systems. By fitting a country into a particular syndrome, you understand the underlying causes and impacts of corruption and can identify appropriate reform programs to reduce corruption. Practical ways of implementing the syndromes approach are presented in the USAID Anticorruption Assessment Handbook.

**Step 3 - Analysis of Stakeholders.** The assessment also analyzes the views of major players on anticorruption reform. The analysis considers the support or opposition of the ruling party, opposition, bureaucracy, subnational governments, judiciary, military, business, labor, civic groups, organized crime, donors, and foreign governments. This analysis examines whether the government is unified or composed of competing factions on corruption issues, and how the government's constituent base and any patron-client networks could be affected by inroads against corruption. The analysis also considers how groups that oppose reform can be contained. The stakeholder analysis can be captured in a political map, which visually indicates the more important groups in terms of resources and political influence. USAID's *Anticorruption Assessment Handbook* provides more detail on political mapping of stakeholders.<sup>23</sup>

**Step 4 - In-Depth Diagnosis of Sectors, Functions and Institutions.** In many heavily corrupted societies, corruption appears throughout the government, but its impact is not uniform. To target interventions appropriately, the assessment needs to explore more fully those areas of government where corruption is most damaging. To do so, the framework suggests conducting detailed diagnoses of the sectors, functions and institutions where corruption problems are concentrated. A library of 19 sector-by-sector Diagnostic Guides is available in an annex to the assessment handbook and provides detailed questions to probe corruption issues.<sup>24</sup>

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<sup>23</sup> USAID Anticorruption Assessment Handbook, 2009: [http://pdf.usaid.gov/pdf\\_docs/pa00jp37.pdf](http://pdf.usaid.gov/pdf_docs/pa00jp37.pdf), p.15; and "Stakeholder Analysis: A Vital Tool for Strategic Managers," Benjamin Crosby, USAID IPC Technical Note 2, 1991: [http://pdf.usaid.gov/pdf\\_docs/pnabr482.pdf](http://pdf.usaid.gov/pdf_docs/pnabr482.pdf)

<sup>24</sup> The diagnostic guides cover the following topics: anticorruption agencies, judiciary, supreme audit institution, law enforcement institutions, public institutions/civil service, budget and financial management, public procurement, taxation system,

While each guide addresses a unique set of issues and contexts, there are some common categories of questions. These include institutional authority and capacity, independence, accountability, transparency, integrity mechanisms, and enforcement mechanisms. For each selected sector/function/institution, the assessment probes the vulnerabilities to corruption, analyzes opportunities and obstacles to reducing these vulnerabilities, and makes program recommendations.

### **Step 5 - Anticorruption Program Track Record.**

Lessons learned from anticorruption programming and analytical studies are instrumental in identifying and formulating program interventions to be appropriate and effective for particular country context. Anticorruption program experience described in the next section of this Guide can help in selecting approaches of anticorruption programming. As well, an annex of the Assessment Handbook offers references and links to publicly available research that provides guidance on appropriate programming under different conditions.<sup>25</sup> In addition, USAID/DCHA/DRG has recently developed a searchable database of several hundred programs implemented between 2007 and 2013 that provides information about what has been tried in different sectoral programs worldwide and what approaches have been used. Together, these tools can guide appropriate anticorruption programming recommendations.

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customs, privatization, education, healthcare, regional and local government, legislature, electoral commission and election process, political parties, mass media and access to information, civil society, and private sector. See annex in *USAID Anticorruption Assessment Handbook*, 2009:

[http://pdf.usaid.gov/pdf\\_docs/pa00jp37.pdf](http://pdf.usaid.gov/pdf_docs/pa00jp37.pdf).

<sup>25</sup> See annex in *USAID Anticorruption Assessment Handbook*, 2009:

[http://pdf.usaid.gov/pdf\\_docs/pa00jp37.pdf](http://pdf.usaid.gov/pdf_docs/pa00jp37.pdf).

## Anticorruption in G2G Programming

When USAID selects partner country systems (government-to-government or G2G) for implementation of projects, a Public Financial Management Risk Assessment Framework (PFMRAF) is typically required (with limited exceptions by ADS 220)<sup>26</sup>. During a 2-stage process, PFMRAF provides an in-depth assessment of the country's public financial management and accountability systems, conducts DRG reviews if applicable, and examines the capacity, control systems, and day-to-day practices of the PFM systems in the ministries, departments, or agencies that may be responsible for making and carrying out decisions and actions related to USAID assistance. ADS 220 specifically requires PFMRAF to assess corruption and government commitment to address it through specific reforms. It also directs USAID Missions to "consider agreeing to tighter scopes of work, milestone type financing agreements, and other risk mitigation measures that address any vulnerability to corruption when working through partner country systems." When implemented as required by ADS 220, PFMRAF serves as a viable instrument for incorporating anticorruption interventions in the G2G programming. It is essential though that the project track and measure the impact of these interventions on preventing or reducing corruption.

## Prioritizing Anticorruption Interventions

Yet even with tailoring anticorruption strategies to the country context, assessments typically identify

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<sup>26</sup> USAID, ADS 220: Use of Reliable Partner Country Systems for Direct Management and Implementation of Assistance, 2012:

<http://www.usaid.gov/sites/default/files/documents/1868/220.pdf>

too many issues for one donor to address. Consequently, prioritization of proposed interventions is an important step in the programming process.

Prioritizing interventions should first reflect the anticipated impact on corruption. The anticipated impact will be higher where interventions target the more damaging corruption issues identified in the assessment. Admittedly, identifying the more damaging corruption issues entails a subjective judgment, but the cost to people's well-being is one set of factors to consider and the cost to the legitimacy and effectiveness of government is another.

Prioritizing interventions should also reflect the likelihood of success. The likelihood of success will be higher where political will is strong and opposition is weak. The presence of champions both within and outside government can be a key factor in the decision to target specific sectors, functions or institutions. Experience has shown that anticorruption programs are most effective when they support committed efforts on the part of host country counterparts and, more generally, align with government priorities. By the same token, the absence of strong opposition can be an important factor in USAID's decision. A focus on corruption involving the highest levels of government may be too politically sensitive in some contexts, for example, but administrative corruption may be a viable focus for USAID programming. While focusing reform efforts on administrative corruption may seem unfair if grand corruption is persisting, it may improve citizens' experience of public services while staying within the bounds of political feasibility. It also may help move the broader political culture toward opposing grand corruption.

USAID officers should also apply the "do no harm" principle to program prioritization. This entails considering the potential impact of anticorruption interventions on the personal safety of program beneficiaries and on sources of conflict between

groups. Certain questions need to be asked. Do any of the proposed interventions put our partners at significant risk or have the potential to ignite conflict? Could the interventions be designed to minimize such harms? The riskier the intervention, the lower it should fall in the Mission's prioritization.

Prioritization should also reflect Mission resources and priorities. In some cases, limited staff or budget resources mean that Missions cannot undertake standalone anticorruption programs, but must instead embed anticorruption efforts in their existing programming. The Mission's portfolio may then guide the prioritization of anticorruption efforts toward those sectors, institutions and functions where it is engaged. Improved efficiency, greater transparency, or a better business environment can be viable anticorruption entry points in this context.





# V. LEARNING FROM ANTICORRUPTION PROGRAM EXPERIENCE

A growing body of research is generating insight into anticorruption approaches that are more or less effective. The most reliable evidence comes from randomized control trials (RCTs), quasi-experimental methods, and observational or econometric studies using regression-based approaches. Few studies to date use such rigorous methodology however, so emerging lessons also draw from case studies, program evaluations and qualitative research. When considering this broader body of research, consistent as opposed to contradictory findings across multiple studies suggest more reliable evidence. Evaluating the evidence also entails looking at the quality of the research including internal validity and any possible biases.

What follows are emerging lessons about effective programming along with a discussion of the reliability of the evidence – first, based on USAID’s own experience and second, based on recent research.

## Lessons from Recent USAID Anticorruption Projects

In addition to the descriptive analysis in Section II of more than 300 USAID projects implemented worldwide between 2007 and 2013, an empirical analysis of 107 of these USAID projects, where more data were available, was conducted. The analysis reveals some useful recommendations for future project design. In these findings, success of the project’s anticorruption intervention is measured, in most cases, based on a determination by the implementer or evaluator focusing only on the anticorruption results of the project. This is because most projects did not explicitly measure corruption outcomes. Overall,

the sample of cases is small and the results limited in scope, but the trends that are revealed and sample projects that illustrate these trends can provide useful tips and approaches to help guide USAID in future anticorruption programming.

### Explicit anticorruption objectives are highly valued

**Finding:** When anticorruption is explicitly identified as one of the objectives of the overall project, project success in terms of anticorruption outcomes is more likely (64% of explicitly defined cases).

**Example:** The Integrity Project (iPro) sponsored by USAID in the **Philippines** between 2009-2011 had an explicit overall goal of “improved good governance in the Philippines.”<sup>27</sup> To achieve this goal, the project’s purpose was to enhance anticorruption efforts. It did this explicitly by seeking two outcomes: 1) management of corruption cases at the Office of the Ombudsman (the principal anticorruption agency at the central level) is effective and transparent by strengthening the agency’s capacity and supporting effective prosecution of corruption cases in the lower courts, and 2) anticorruption measures are in place by building institutional capacity to reduce corruption and cascading the fight against corruption to the local and regional levels.

As we have pointed out earlier, for the most part, MCC TCP programs have had the best articulated anticorruption objectives. For example, the **Albania** Support to Millennium Challenge Account

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<sup>27</sup> Integrity Project Annual Report, December 2010: [http://pdf.usaid.gov/pdf\\_docs/pdacu506.pdf](http://pdf.usaid.gov/pdf_docs/pdacu506.pdf)

TCP project<sup>28</sup> clearly stated its objectives to reduce corruption in and reform public procurement, tax administration, and business registration. To achieve these objectives, the project was tasked to remove opportunities for corruption in the tax administration office by reducing direct interactions between tax officials and taxpayers, implementing electronic government systems and promoting a transparent legal environment. In the procurement field, the project was explicitly structured to improve transparency and public scrutiny of the public procurement process, enable an oversight body by establishing the Ombudsman of Procurement, and implement e-procurement systems. Under the business registration reform component, the project was tasked to establish a one-stop shop for business registration, thereby reducing administrative discretion and excessive personal interactions.

Having anticorruption objectives clearly established is crucial for success of the project in pursuing corruption but it is still not a guarantee that the project will achieve anticorruption outcomes. For example, while the **Armenia Mobilizing Action Against Corruption (MAAC)**<sup>29</sup> (2007-2011) was explicitly targeted from the start to reduce corruption, it experienced many obstacles and challenges including lack of host government cooperation, which minimized the project's impacts on corruption overall.

### Preventive initiatives tend to be effective

**Finding:** When the program intervention is focused on prevention, either by promoting greater government transparency or strengthened government accountability, success in achieving

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<sup>28</sup> Albania Support to Millennium Challenge Account TCP project, Final Report:

[http://pdf.usaid.gov/pdf\\_docs/PDACM504.pdf](http://pdf.usaid.gov/pdf_docs/PDACM504.pdf)

<sup>29</sup> Mobilizing Action Against Corruption (MAAC), Mid-term Evaluation, September 2010:

[http://pdf.usaid.gov/pdf\\_docs/PDACR143.pdf](http://pdf.usaid.gov/pdf_docs/PDACR143.pdf)

anticorruption goals is more likely (72.9% of preventive cases).

Transparency mechanisms can include open budgets, open hearings, access to information, and legal drafting related to transparency issues, among others. Accountability mechanisms can include codes of conduct, asset declarations, administrative/procedural simplification, audits, complaints management, and legal drafting related to accountability issues, among others.

**Example:** The Combating Corruption and Strengthening Rule of Law in **Ukraine** under the Millennium Challenge Corporation Threshold Country Program (UROL MCC) (2006-2009) assisted Ukraine in its effort to implement controls to ensure that the judicial system is more accountable to the public through instituting strengthened court automation, judicial testing, and judicial discipline.<sup>30</sup> In particular, the project: 1) implemented a registry of court decisions, 2) developed and implemented a uniform random case assignment system in selected courts, 3) established an effective and transparent process of judicial appointment and disciplinary procedures, and 4) created an operating system for administrative courts in the regions. Although public perception of widespread corruption in the judiciary still increased, the project resulted in a small decrease in extortion by court administration and an increase in citizen trust in the judiciary.

### Addressing grand corruption can have an impact

**Finding:** 75% of all programs that targeted grand corruption achieved successful anticorruption outcomes.

Grand corruption involves high level officials and large financial rewards, such as public procurement fraud, voter fraud, kickbacks,

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<sup>30</sup> Combating Corruption and Strengthening Rule of Law in Ukraine, Final Report, 2009:

[http://pdf.usaid.gov/pdf\\_docs/Pdacn921.pdf](http://pdf.usaid.gov/pdf_docs/Pdacn921.pdf)

extortion, patronage and nepotism, among others. One project, the Egypt Technical Assistance for Policy Reform II (2005-2010), targeted big business reforms and customs. For the Aceh Technical Assistance Recovery Project (2005-08), the anticorruption component focused on ensuring accountability of the billions of dollars in donor aid sent to help Indonesia recover from the effects of the tsunami. The project established an effective complaint and investigative system that resolved 98% of all cases, earning it a solid reputation for deterring high level corruption. The Indonesia Control of Corruption Project (part of the MCC TCP) (2007-09) promoted an anti-money laundering program among non-bank financial institutions while enhancing investigative capacities.

**Example:** The USAID-sponsored Financial Services Project in **Egypt** (2004-2010) was designed to assist the government in building market infrastructure with significant oversight and controls to strengthen the real estate finance sector without the threat of corrupt practices.<sup>31</sup> The project provided technical assistance aimed at institutional strengthening, regulatory reform, and professional development. Success was achieved in helping to strengthen the regulatory capabilities of Egypt's Mortgage Finance Authority. In particular, it helped to standardize mortgage lending and underwriting processes to promote Egypt's use of secured lending instruments to increase the use of proper mortgages. It also achieved notable success in assisting the Central Bank of Egypt to strengthen its oversight and supervision of the Egyptian private credit bureau. The anticorruption success of the project was measured, in part, by improvements in "doing business": by the end of the project, the number of days required to legally register property dropped

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<sup>31</sup> USAID Office of the Inspector General, Audit of USAID/Egypt's Financial Services Project, Audit Report No. 6-263-10-002-P, November 30, 2009: <http://oig.usaid.gov/sites/default/files/audit-reports/6-263-10-002-p.pdf>

from 193 days to 72 days and the cost to do so dropped from 6.8 percent of the total property value to 0.9 percent. Other similar indicators showed significant improvement in the speed and quality of government services that could be directly related to project initiatives. The project worked with both public and private entities and cooperated and coordinated its efforts with other donor agencies including the World Bank, the International Finance Corporation, the European Union, the Canadian International Development Agency, and complementary USAID projects. To achieve its objectives, USAID/Egypt worked with representatives from the Government of Egypt's ministries of Investment, Finance, Justice, and State and Administrative Development, as well as the Central Bank of Egypt. These initiatives and coordinative activities were focused on closing the opportunities for grand corruption in the real estate financial dealings at a time of growth in that sector in Egypt.

### Rule of law/judicial sector and private sector/economic growth anticorruption efforts tend to be successful

**Finding:** 73% of all programs targeted at the rule of law/judicial sector or the economic governance/private sector achieved successful outcomes.

**Example:** While the overriding purpose of the Justice Reform and Modernization Project in **Colombia** (2006-2010)<sup>32</sup> was to provide increased access to justice for citizens, its specific contract goals were organized into four program components: 1) assist in the implementation of the accusatorial trial system and increase the numbers, availability and skills of Colombia's public defenders; 2) help reform the administration and

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<sup>32</sup> Justice Reform and Modernization Project, Final Report, 2010: [http://pdf.usaid.gov/pdf\\_docs/PDACR351.pdf](http://pdf.usaid.gov/pdf_docs/PDACR351.pdf)

management of the judicial system and make it more, transparent, efficient and equitable; 3) increase access to justice for the poor and disenfranchised by improving the quality and increasing the availability of alternative dispute resolution services, and by assisting in the establishment of multi-agency justice centers throughout Colombia; and 4) increase the capacity of civil society to mobilize support for justice reform, and to monitor, assess and advocate for and assist in the national justice reform process. The main objectives of Component 2 were to improve operational court management systems associated with the accusatorial system and to implement mechanisms to reduce judicial corruption. Significant anticorruption outcomes were achieved:

- The project helped create and train citizen oversight groups in Cartagena, Medellín, Valle del Cauca and Bogotá. It trained and activated seven citizen oversight groups from Bogotá-based universities to monitor how justice-related issues were being managed in the courts.
- Systems were developed to permit public access to attorney disciplinary records.
- Judges and court administrators in several locations were trained in the procedures necessary to provide fair and efficient judicial services – up to international standards.
- Grants were awarded to groups focusing on corruption topics which helped to define the areas of greatest vulnerability in the Colombian justice system.

### Strong stakeholder political will in achieving anticorruption goals

**Finding:** When the government and/or nongovernmental stakeholders demonstrate strong political will in the intervention, success in achieving anticorruption goals is more likely (68.6% of cases with government political will and 65.9% of cases with nongovernmental political will).

**Example:** From May 2006 to February 2009, USAID and the Government of **Zambia** (GRZ) implemented a Threshold program on behalf of the Millennium Challenge Corporation (MCC).<sup>33</sup> The program was designed to reduce administrative corruption and barriers to trade and investment by improving the effectiveness of selected GRZ institutions. Several GRZ institutions, led by the Ministry of Finance and National Planning and including representatives of key institutions participated in the development of the Threshold Country Plan (TCP) thereby engaging their interest and cooperation. This inter-ministerial team also worked closely with Zambian stakeholders in civil society and the private sector such as Transparency International **Zambia** (TIZ) and the **Zambia** Business Forum (ZBF), thereby actively engaging nongovernmental actors and building their political will to cooperate. All stakeholders were members of a steering committee that directed and oversaw the TCP's implementation. Activities included: capacity building for the Anti-Corruption Commission (ACC), establishment of internal watchdog units within participating institutions, creating efficient citizen monitoring and reporting mechanisms, and implementation of institutionally tailored regulatory reform, among many others. As part of this, the program worked with the ACC to design and implement a program to fight administrative corruption through improving governance and emphasizing corruption-free, integrity-based services. Corruption in **Zambia** has been reduced through the Threshold program. Successes include:

- Significantly reduced bribe-paying/taking opportunities.
- Improved transparency and accountability.

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<sup>33</sup> Millennium Challenge Corporation Threshold Country Program, Final Report for Zambia, May 2009: <http://www.mcc.gov/documents/reports/content-report-121510-zambia-threshold-final-implementation-report.pdf>

- Changed attitudes towards transparency, efficiency, and customer service attitudes and expectations.
- Expanded inter-institutional alliance against corruption, including Africa's first Advocacy and Legal Advice Centre.

### Success correlates with government political will and engaging with civil society and judicial stakeholders

**Finding:** When the host government's political will is strong, projects that engage civil society and judicial counterparts are more likely to be successful (71% of cases involving civil society and judicial counterparts).

Government buy-in to anticorruption programs appears to encourage interested stakeholders – both inside and outside of government – to engage actively in the initiatives, thus creating a coalition for reform and a greater likelihood of successful outcomes.

**Examples:** The Georgia Judicial Administration and Management Reform (JAMR) project (2007-11) aimed to promote independence and strengthen the capacity of Georgia's judiciary. The Georgian judiciary demonstrated a serious commitment to improving both its administration and its public outreach. JAMR took advantage of this by providing extensive trainings and workshops and nurturing this ongoing cooperation and political will for improvement. The project combined four integrated areas of activity including improvement of court operations; establishment of court managers as recognized and effective specialists within Georgia's judicial system; strengthening the capacity of the judiciary to develop and manage court budgets; and public outreach. JAMR activities contributed directly to anticorruption impacts by increasing transparency and consistency in court operations. New courtroom regulations and systems, case management system automation, procedural streamlining,

information desks in the courts, and public awareness outreach made court operations more uniform, accountable and transparent. Court personnel were trained in court management and customer service, and professional court managers were hired to provide for a more accountable judicial system.

The Support for Trade Acceleration Projects (STAR 1 and STAR II, from 2001 to 2010) was strongly supported by the Government of **Vietnam** (GVN) from the very start.<sup>34</sup> With a new economic growth strategy to transition to a market-based economy just adopted and a bilateral trade agreement (BTA) with the United States and accession to the World Trade Organization (WTO) to accelerate the transition process, the GVN was proactive in requesting technical assistance to facilitate revision of its commercial laws, legal procedures, transparency and appeals processes to meet BTA and WTO requirements. STAR effectively delivered a large volume and variety of technical assistance with greater impact and accomplished objectives by drawing in civil society, judicial system and other government stakeholders. The STAR programs accomplished their objective to help the GVN satisfy BTA and WTO accession requirements. Special program elements were incorporated that encouraged multi-stakeholder participation in the project, including a host government steering committee and involvement of local citizens in delivering technical assistance. Under the guidance of the GVN, the project worked directly with the court system including technical assistance to establish a web portal to make ten years of court decisions available to the public. However, the court system continues to need of more reform. It lacks expertise and is not trusted by the public. Corruption is a problem, in part, because salaries are low and the judicial process is unpredictable.

<sup>34</sup> Performance Evaluation of the USAID/Vietnam support for Trade Acceleration (STAR) Project, May 2011: [http://pdf.usaid.gov/pdf\\_docs/pdacs486.pdf](http://pdf.usaid.gov/pdf_docs/pdacs486.pdf)

## Lessons about Anticorruption Programming from the Broader Research Literature

A review of the broader research literature on anticorruption programs also offers some findings and trends that can help guide future anticorruption programming.

### Make the reforms fit the context

The review by Johnsen et al.<sup>35</sup> points to the importance of tailoring interventions to specific contexts. Figure 6 depicts the impact of interventions and the strength of the evidence across 22 interventions. As seen in the middle band, the findings are contested for over half of the interventions examined. The evidence shows that interventions work in some cases but not in others, suggesting that context matters for the efficacy of these reforms. The evidence was strong for only two types of interventions: public financial management (PFM) reforms and supreme audit institutions (SAIs). For PFM, the evidence in general showed positive results, whereas the effectiveness was mixed for SAIs. Reforms in the bottom band—dealing with the ombudsperson, anticorruption agencies, civil service reform and corruption conditionality—are deemed ineffective by the evidence, but it is possible that a better-designed program could be effective. Research suggests a number of factors that influence the effectiveness of specific reforms, including:

**Figure 6. Summary of the Evidence on Anticorruption**



- The impact of support to supreme audit institutions depends on the independence and political composition of parliamentary committees.<sup>36</sup> When parliamentarians are independent of the executive and hail from the opposition or a rival political faction, they have more incentive to follow up on audit recommendations and pursue those under investigation.
- Support for anticorruption laws is only likely to have an impact when the country has a functioning judicial system.<sup>37</sup> Getting the laws in place can be seen as an interim step in such a context, but are unlikely to have an effect on corruption levels independent of other reforms.
- Civil service reforms are more effective where patronage-based systems are weak, which may prevail in a post-conflict or transition situation, for example. However, some reforms are more politically risky than others.

<sup>35</sup> Jesper Johnsen, Nils Taxell and Dominik Zaum, "Mapping Evidence Gaps in Anti-corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption," U4 Issue October 2012, No 7: <http://www.u4.no/publications/mapping-evidence-gaps-in-anti-corruption-assessing-the-state-of-the-operationally-relevant-evidence-on-donors-actions-and-approaches-to-reducing-corruption/>

<sup>36</sup> "Public Sector Reform: What Works and Why? An IEG Evaluation of World Bank Support," The World Bank, 2008: <http://web.worldbank.org/WBSITE/EXTERNAL/EXTOED/EXTPUBSECREF/0,,menuPK:4664077~pagePK:64829575~piPK:64829612~theSitePK:4663904,00.html>

<sup>37</sup> Public Sector Reform, op.cit.

Whereas downsizing is likely to trigger resistance from within the civil service, organizational reforms that alter staff assignments and compensation reforms that provide bonuses for performance may succeed even where patronage systems are in place.<sup>38</sup> Further, establishing job qualifications only for new applicants is less likely to trigger resistance than requiring current employees to meet such qualifications.

- The effectiveness of anticorruption agencies depends on a number of conditions, including adequate staffing, training, and remuneration, political independence and basic elements of the rule of law.<sup>39</sup> But even well-resourced and independent anticorruption agencies can face stiff political resistance.

A study by Innovations for Successful Societies (ISS) of eight anticorruption agencies points to several tactics they can use to outmaneuver opponents,<sup>40</sup> including:

- Strong internal controls and accountability mechanisms, which help preserve integrity and protect the agencies from being subverted or discredited;
- Alliances with citizens, state institutions, media, civil society, and international actors to mount counter-attacks if necessary;
- Preventive efforts that disrupt corruption networks, together with educational efforts that reshape public norms and expectations, which may enable an agency to make long-term gains; and

- Under certain conditions, careful management of timing, resources and external support in pursuit of high-level corruption.

### Less sensitive interventions might be pursued in politically challenging contexts

The World Bank evaluation of public sector reforms concludes that support through modest and selected entry points can yield partial success and lay the basis for later progress, including in difficult areas such as civil service reform.<sup>41</sup> Interventions to improve efficiency and transparency, for example, can serve as good entry points where political will is questionable.

### Combining accountability mechanisms and sanctions for getting caught can be effective

Government monitoring programs (such as government audits and community monitoring) work to reduce corruption by increasing the probability of getting caught while sanctions (such as legal, administrative or societal) work by increasing the cost to an official who is caught engaging in corrupt activities. Monitoring and sanctions may be implemented on their own, but a review by Hanna et al<sup>42</sup> finds that monitoring on its own is ineffective and, similarly, increasing the sanctions for corruption has no effect when the probability of getting caught is too small.

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<sup>38</sup> Public Sector Reform, op.cit.

<sup>39</sup> USAID Anticorruption Strategy, 2004:  
[http://pdf.usaid.gov/pdf\\_docs/pdaca557.pdf](http://pdf.usaid.gov/pdf_docs/pdaca557.pdf).

<sup>40</sup> Gabriel Kuris, "From Underdogs to Watchdogs: How Anti-Corruption Agencies Can Hold Off Potent Adversaries," Innovations for Successful Societies, Princeton University, 2014:  
[http://www.princeton.edu/successfulsocieties/content/data/policy\\_note/PN\\_id236/Policy\\_Note\\_ID236.pdf](http://www.princeton.edu/successfulsocieties/content/data/policy_note/PN_id236/Policy_Note_ID236.pdf),

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<sup>41</sup> Public Sector Reform, op.cit.

<sup>42</sup> Hanna, R., Bishop, S., Nadel, S., Scheffler, G, Durlacher, K. (2011) "The effectiveness of anti-corruption policy: what has worked, what hasn't, and what we don't know—a systematic review." Technical report. London: EPPI-Centre, Social Science Research Unit, Institute of Education, University of London:  
<http://eppi.ioe.ac.uk/cms/LinkClick.aspx?fileticket=9T7II Z7LFw8%3D&tabid=3106&mid=5783>

### Monitoring and Sanctions Combined: Audits in Brazil

Taking advantage of a federal anticorruption program that randomly assigned municipalities to be audited, researchers in Brazil compared the electoral outcomes for mayors in two groups of municipalities: those that were audited before and those that were audited after the 2004 election. This provided an opportunity to observe whether voters' access to information prior to the election about politicians' corruption levels affected reelection rates for incumbent mayors.

The research found that publicly released audits reduced reelection of corrupt incumbent mayors and this effect was more severe in municipalities with a local radio station. In municipalities where two corruption violations were reported, the release of information reduced the incumbent's likelihood of reelection by 7 percentage points. In municipalities where two violations were reported and a radio station existed, the release of information reduced the incumbent's likelihood of reelection by 11 percentage points. When corruption was not found in a municipality with a local radio station, audits increased the likelihood that the mayor was reelected by 17 percentage points.

*Source:* "Exposing Corrupt Politicians," The Abdul Latif Jameel Poverty Action Lab Policy Briefcase, December 2011.

Hanna et al. draw these lessons from a total of 14 interventions that used rigorous methodologies to gauge their impact. In four cases, governments successfully implemented monitoring programs combined with non-financial sanctions such as publicizing municipal audit records prior to mayoral elections or terminating the bureaucrat's position. In another three cases, community monitoring combined with a media or other information dissemination strategy (and presumably social sanctions) proved effective in lowering corruption, whereas less-focused information dissemination efforts in two further cases were unsuccessful. Mixed results for community monitoring used alone in two additional cases suggest its effectiveness may be

heavily reliant on the cohesiveness of the community for responding to corruption findings. Finally, two interventions combining monitoring of absenteeism with financial sanctions in the form of fines taken from employees' wages concluded that the schemes can work if managers support the efforts of monitors.

### Comprehensive programs that promote both supply- and demand-side anticorruption initiatives may be more effective

A number of studies point to the need to strengthen both and supply- and demand-side initiatives together. A multi-donor evaluation commissioned by seven Development Assistance Committee (DAC) donors looks at 90 interventions to strengthen citizens' voice and state accountability.<sup>43</sup> It finds that donor initiatives often focus either on voice or accountability, but that both are needed to improve governance and development outcomes. Similarly, a World Bank evaluation of governance and anticorruption interventions between 2008 and 2010 stresses that weak demand-side pressures and external accountability can undermine supply-side efforts.<sup>44</sup> It notes how such demand-side pressures as vouchers or community involvement in managing schools can buttress state accountability systems in the education sector. As well, external monitoring of expenditures and procurement--by competitors, contractor associations or civil society--can buttress state systems in road construction. Supporting these findings, research by the Development Research Center drawing from more than 150 case studies over a decade shows that citizen action in promoting good

<sup>43</sup> Alina Rocha Menocal and Bhavna Sharma, "Joint Evaluation of Citizens' Voice and Accountability: Synthesis Report." London: DFID, 2008.

<sup>44</sup> "World Bank Country-Level Engagement on Governance and Anticorruption: An Evaluation of the 2007 Strategy and Implementation Plan," The World Bank, 2011.



governance becomes most effective through strategies that build alliances, mechanisms and platforms linking champions of change from both state and society rather than treating citizen action and government initiatives in isolation.<sup>45</sup>

### **Supply and Demand Together: Financial Management in Guatemala**

As part of Guatemala's public financial management reforms, a new framework for municipal financial management (SIAFMUNI) was implemented in more than 200 municipalities to improve both efficiency and transparency. In parallel, a citizen-oriented portal, Consulta Ciudadana, was established to offer user-friendly applications to facilitate access and interpretation of complex financial reports. Taken together, these measures have enabled citizens to access information about basic local government financial and procurement processes. Additional demand-side training efforts have been launched to empower citizens, some of whom expressed discomfort with the quality, accessibility, comprehensiveness, accuracy, and consistency of fiscal information.

*Source:* "World Bank Country-Level Engagement on Governance and Anticorruption," 94.

A review of more than 300 USAID anticorruption programs implemented between 2007 and 2013 also makes this recommendation.<sup>46</sup> In this review, the majority of programs working on the supply side had rather narrow interventions on the demand side because they were not well equipped for working with civil society. In some countries, stand-alone civil society programs engaged CSOs, businesses or the media in advocacy and watchdog activities. The results from these programs showed that a combination of top-down and bottom-up approaches was very effective for ensuring government accountability in carrying out reforms as well as sustainability of the reforms.

<sup>45</sup> Citizenship DRC, "Blurring the Boundaries: Citizen Action across States and Societies," The Development Research Center on Citizenship, Participation and Accountability, 2011.

<sup>46</sup> Winbourne and Spector, op.cit.

The review noted that if separate supply and demand programs are implemented, they should be coordinated with each other. For example, a program in the health sector working on the supply side should be complemented with a civil society program focused on health issues that monitors healthcare service delivery to keep government accountable.

### **Focus on Financial Flows: PETS in Uganda vs. Tanzania**

Public expenditure tracking surveys (PETS) track how public money flows from central ministries to service providers (notably schools and health facilities) in order to identify how much is lost or diverted on the way. PETS identify problems but do not address them. For this to happen, PETS findings need to be disseminated and used to inform reform efforts. In Uganda, for example, a PETS conducted in 1996 showed that, on average, only 13% of the annual capitation grant from the central government reached the schools. To remedy this, the government increased the information available for local stakeholders to demand accountability. The government published the monthly intergovernmental transfers of capitation grants in the main newspapers and on radio, and required primary schools to post information on inflows of funds. A repeat PETS study in 2001 revealed a great improvement as 82% of the grant was reaching the schools. By contrast, a series of PETS conducted over a decade in Tanzania revealed consistent large-scale leakage in education funds, but the government did not disseminate the findings or engage in a policy dialogue to address them, and the leakage has persisted.

*Source:* Bernard Gauthier, "Making Leakages Visible: Public Expenditure Tracking in Education," *Global Corruption Report: Education*, Transparency International, published by Routledge, New York, NY, 2013.

## **Reforms that focus on financial flows can be effective**

A review of close to 200 anticorruption studies<sup>47</sup> points to the effectiveness of reforms focused on financial flows. Across 22 categories, this review finds solid evidence for the impact of interventions

<sup>47</sup> Johnsen, Taxell and Zaum, op.cit.

in only three categories: public financial management, procurement, and tax reform. These effective interventions entailed public expenditure tracking surveys, open auctions, audits of procurement, reforming the value added tax refund system, and establishing a semi-autonomous tax authority.

An evaluation of more than 460 World Bank projects that focused on public sector reform has similar findings.<sup>48</sup> Improvements in a composite measure of governance were greater for Bank interventions in public financial management and revenue administration, but smaller in civil service reform, anticorruption (focusing on laws and prosecution) and transparency. Bank projects for tax administration generally succeeded and benefited from strong government ownership, particularly by ministries of finance. Projects focused on budget formulation and reporting usually had more success than those focused on the downstream phases of the spending cycle, such as procurement and auditing.

The World Bank review posits that financial management and tax administration reforms are more effective because they are less politically sensitive than issues surrounding public employment and corruption. It also credits good diagnostic work and indicators with generating better outcomes in these areas. In particular, it cites Public Expenditure Reviews and the Public Expenditure and Financial Accountability indicators as instrumental in guiding reforms.

### Reforms that streamline and standardize business processes can be effective

The review of USAID anticorruption programs<sup>49</sup> notes that streamlining and standardizing government agency operations and service delivery reduces opportunities to corruption by

<sup>48</sup> "Public Sector Reform, op.cit.

<sup>49</sup> Winbourne and Spector, op.cit., Annex 3.2

reducing space for discretion. Automating such processes through e-government systems further diminishes vulnerability to corruption by eliminating direct interaction between public officials and customers, embedding internal control mechanisms, and making processes transparent to the public by providing public access to systems.

#### **E-Technologies: Business Environment in Albania**

Two consecutive Millennium Challenge Account Threshold Agreement projects (MCCA-1 and MCCA-2) implemented in Albania between 2006 and 2011 were focused on introducing e-government technologies to reduce opportunities for corruption in government-business sector transactions. Particularly, they developed e-government systems to streamline tax declaration and payment, register businesses and receive business license applications, and conduct public procurement. In addition, the project assisted in developing a publicly available GIS-based urban development system to facilitate transparent construction permit issuing system. Implementation of these reforms in combination with information campaign among businesses and engaging NGOs in monitoring and assessing the effectiveness of the reforms resulted in significant reduction in business experience and perception of the level of corruption in tax collection and procurement and in corrupt practices in business registration processes. For example, perception of frequent corruption in tax collection decreased from 42% to 19% and in procurement from 42% to 17%. It also resulted in the decrease in the value of gifts expected to secure government contracts from 6.15% to 1% of contract value and decrease in bribery during business registration in the centers supported by the project from 19% to 0%.

*Source:* Svetlana Winbourne, Bertram I. Spector and Elena Ponyaeva, "Anti-Corruption and Cross-Sectoral Program Mapping: the Europe & Eurasia Region and Business Enabling Environment Programs Worldwide," August 2013.

More evidence on the impact of such systems in reducing corruption was collected for economic growth programs, particularly those focused on improving the business environment. One of the tools that became popular in the 2000s were one-stop shops (OSS) for business registration; these have expanded in recent years to include other

operations, such as business licensing and permitting, export/import operations, and investor registration. Although the effectiveness and impact of OSSs can vary widely,<sup>50</sup> they largely resulted in reducing opportunities for corruption. Studies and surveys conducted in 2005, 2008 and 2009 in Ukraine to explicitly measure corruption in registration and permitting showed notable reductions in corruption due to one-stop shops.<sup>51</sup>

Case management systems are another tool that showed potential in reducing opportunities to corruption. It has been extensively used in justice sector programs but also has expanded to health sector and other service delivery agencies although only a few programs have measured their impact directly on reducing corruption.

Deployment of e-government systems in various governmental operations showed significant impact in increasing citizen confidence in the government and reduction in corruption. For example, in Albania, perception of frequent corruption in tax collection and bribery in business registration and procurement decreased significantly. In Georgia, implementation of new courtroom regulations and systems, deployment of automated case management systems and court audio recordings, and procedural streamlining resulted in a reduction in bribery in pilot courts. The launch of automated information

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<sup>50</sup> How many stops in a one-stop shop? A review of recent developments in business registration. IFC, 2009: <https://www.wbginvestmentclimate.org/uploads/Howmanystopsinaonestopshop.pdf>

<sup>51</sup> Reducing administrative corruption in Ukraine: regulatory reform USAID/BIZPRO. 2005: [http://pdf.usaid.gov/pdf\\_docs/PDACG850.pdf](http://pdf.usaid.gov/pdf_docs/PDACG850.pdf) and Corruption and Business Regulations in Ukraine: Construction and Land Transactions Permits. Comparative Analysis of National Surveys: 2008-2009 for the MCC Threshold Country Program. MSI, 2009: <https://sites.google.com/a/usaid.gov/drg/home/about-1/drg-center-teams/governance-and-rule-of-law/anticorruptionmapping>

systems in pilot hospitals in Albania to track and optimize the patient flow process created greater control over critical data and reduced the opportunity for committing medical fraud.

### **Facilitated Community Participation: Healthcare in Uganda**

Researchers used a randomized experiment to evaluate the impact of community involvement in health care in Uganda. They collected data on service provision via report cards and convened a series of meetings to analyze the data and develop an action plan for improved services. Trained facilitators led discussions first with community members, then with healthcare workers, and finally with both groups. The action plan established on-going monitoring by community members of health facilities. One year later, the treatment facilities experienced a 13 percentage point decrease in absenteeism and a 33 percent reduction in infant mortality.

*Source:* Martina Bjorkman and Jakob Svensson, "Power To The People: Evidence From A Randomized Field Experiment on Community-Based Monitoring in Uganda," *The Quarterly Journal of Economics*, May 2009.

### **Focused citizen engagement in anticorruption initiatives can be successful**

Researchers using randomized evaluations find that community participation in public projects and services is more effective at improving governance when people are given specific tasks and training.<sup>52</sup> In Kenya, for example, training of school committees improved how these committees handled teachers accountable to them; in India, a program that trained local volunteers to directly intervene in child learning was very successful while general encouragement to participate was not; and a successful Uganda program developed specific action plans for communities and health providers on how services would be improved. The programs that proved

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<sup>52</sup> "Community Participation," on Poverty Action Lab website: <http://www.povertyactionlab.org/policy-lessons/governance/community-participation>

successful in the studies provided training or organizational support to help communities take on specific tasks.

## Infuse anticorruption objectives into sectoral programming and measure impact

An analysis of USAID programs implemented between 2007-2013 worldwide<sup>53</sup> shows that most calls for proposals for sectoral programs rarely included anticorruption as an explicit or cross-cutting theme. But, when calls for proposals do incorporate explicit anticorruption objectives, even in cross-sectoral programs, there were positive results for reduced corruption. This was true for MCC Threshold Country Programs targeting corruption in education and business licensing in Ukraine, and a business registration project in Albania. As well, direct monitoring of how program activities impact corruption instead of reliance on global indices of corruption was shown to be helpful in clearly understanding the performance of different initiatives.

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<sup>53</sup> Winbourne and Spector, op. cit.

## VI. MONITORING AND EVALUATING RESULTS

The impacts of programs on preventing or reducing corruption should be monitored by indicators that directly measure the interventions, whether for a direct anticorruption program or a sectorally focused program. Monitoring and evaluation of anticorruption programming typically include measures of outputs as well as outcomes and impacts.

### **Measures of output typically correspond closely with program interventions.**

Programming that streamlines business processes or introduces integrated financial management systems, for example, could include such output indicators as the reduction in steps needed for a license and the percent of government finances operating under an integrated financial management system, respectively. Given the wide array of interventions that can contribute to anticorruption efforts in different contexts, there are a large number of potentially relevant output indicators. The USAID *Handbook of Democracy and Governance Indicators*<sup>54</sup> serves as a good reference for missions to draw upon to develop their performance monitoring plans. It contains a section on anticorruption indicators, but indicators in other parts of the handbook can also be relevant depending on the specific interventions.

**Monitoring and evaluation also measures program outcomes.** Outcomes represent what the program intends to achieve. For anticorruption programming, the desired outcome is primarily a reduction in the level of corruption. Accordingly, outcome indicators should be designed to measure the level of corruption for the specific geographic area, sector or process that the program specifically targets. National measures of

corruption such as Transparency International's Corruption Perception Index or the World Bank's Control of Corruption index are typically too broad to capture the specific impacts of a donor's program. Best practice suggests using multiple measures to track the specific interventions. These measures might include, for example, data on official transgressions, perception surveys, experience-based surveys, measures of inputs and outputs, and expert assessments. Depending on the intervention, outcome measures may need to factor in time lags as some interventions may take longer to have an impact.

One source for selecting outcome indicators is *A Practical Guide: Measuring Corruption and the Impact of Anti-Corruption Interventions*, developed for the USAID E&E Bureau in the early 2000s.<sup>55</sup> It contains indicators that directly measure changes in corruption behavior, for example, bribes paid by firms as a percent of total revenue, bribes paid in public procurement, and percent of firms that incur additional costs due to corruption (ie., bribes). This Guide also contains many useful output indicators that measure changes in the legal and institutional framework, and policies and procedures that enhance accountability, transparency and integrity. As well, it suggests several perception-based indicators, for example, public perceptions of corruption in the delivery or provision of selected government services as reported in opinion polls, and perceptions of corruption in surveys of firms doing business with the state.

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<sup>54</sup> The Handbook of Democracy and Governance Indicators (1998):  
[http://pdf.usaid.gov/pdf\\_docs/PNACC390.pdf](http://pdf.usaid.gov/pdf_docs/PNACC390.pdf).

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<sup>55</sup> *A Practical Guide: Measuring Corruption and the Impact Of Anti-Corruption Interventions*, Appendix D, MSI, 2002:  
<https://dec.usaid.gov/dec/content/Detail.aspx?ctID=ODVhZjk4NWQzM2YyMi00YjRmLTkxNjktZTcxMjM2NDBmY2Uy&rID=MzUxODIy>

**Measures of official transgressions serve as a natural measure of corruption.** Such measures include corruption violations identified by audits, inspections and prosecutions of public officials. Care should be taken when using such data. They are least reliable where investigative and judicial institutions are weak; low numbers of violations and prosecutions can come from weak systems rather than low levels of corruption. Moreover, violations and prosecutions can reflect the political will to fight corruption and can change in response to political shifts even though the extent of the problem and the institutional capacity remain unchanged. Finally, prosecution data most commonly take the form of a simple count of prosecutions, which does not capture the severity of the corruption crimes, counting prosecution for multi-million dollar kickbacks the same as small bribes to fix traffic violations.

**Perception-based surveys offer another way to estimate corruption levels.** Surveys codify the views of citizens, users of public services, business people and/or government officials on the extent of corruption, probing such topics as the levels of corruption in different institutions, how large a “tax” corruption represents to business, and the likelihood of facing demands for payment. These can provide a national-level perspective or focus more narrowly on a municipality, institution or government activity. The main drawback to these surveys is the bias inherent in the methodology. Perceptions may be influenced by media reports on corruption and people’s expectations, which color their perceptions independent of their experience. In fact, many studies have shown that increased publicity resulting from an anticorruption campaign increases the public perception that corruption is even more widespread. Under more repressive regimes, moreover, respondents may give unjustifiably high marks for fear of denigrating their government by assigning it a low score on corruption. With these weaknesses in mind, perception data can still be quite useful. Perceptions do matter: they influence business decisions, politics, and the calculus to

participate in or refrain from corrupt dealings. As an adjunct to other data sources, they can provide insights into corruption dynamics.

#### **Effective M&E in the Ukraine MCC Threshold Country Plan**

Among good examples of well-targeted and contextually appropriate indicators are those in the Ukraine MCC Threshold Country Plan. The program sought to reduce corruption in university admissions by using standardized tests, in business operations by introducing one-stop-shops (OSS) for land privatization and streamlining cross-border trade, and in the judiciary by improving transparency in the court system and greater access to justice. This program contracted an independent project to measure the impact of each intervention through a set of quantitative and qualitative surveys among customers which was compared to control groups. For example, the impact on corruption in university admissions was measured through targeted surveys and interviews among those who took the standardized tests and those who took the old admission exams. Similarly, the impact of the OSSs was measured through targeted surveys of user samples. These measurements could be directly linked to the specific project interventions to demonstrate measurable impact on corruption.

*Source:* Ukraine MCC TCP (2006-2009).  
<http://www.mcc.gov/pages/countries/program/ukraine-threshold-program>.

*Experience-based surveys* collected from citizens, business people and government officials offer another way to estimate corruption levels. These surveys ask respondents about their direct experience with corruption and generate quantitative data such as the percentage of income paid on bribes and the number of bribes given in the previous year. Such surveys can take the form of *citizen report cards* collected from users of public services as they emerge from government offices. Because they are based on direct experience, they are less biased than perception-based surveys, although a bias can remain as respondents may not be willing to report their participation in a corrupt act. These surveys are nonetheless more reliable than

perception surveys for longitudinal analysis, because such biases that are present are less likely to change over time. In practice, many corruption surveys typically include both perception-based and experience-based questions.

**Measuring inputs or outputs of some aspect of government activity offer another way to gauge the level of corruption.**

These include *public expenditure tracking surveys (PETS)*, which measure the leakage of funds from central ministries down to service providers such as schools and clinics, and quantitative service delivery surveys, which measure inputs, outputs, quality and pricing across service providers. PETS can be practical tools to test how well a system of financial transfers works in terms of getting the money to where it is supposed to be going. They identify weaknesses, offer policy recommendations, and provide a launching pad for a policy dialogue by providing information about leakages.<sup>56</sup> Other efforts in this category also include measuring procurement costs, which compare prices paid for comparable goods across administrative units or compare the money spent on infrastructure in relation to the market cost for it. Absenteeism rates and the number of ghost workers on the payroll also serve as good measures for corruption in public employment. One caveat to consider when using indicators like these is that they may measure inefficiency or incompetence as well as corruption, and it is not always clear to what extent corruption is driving poor numbers.

**Finally, creating a panel of experts to assess the extent of corruption offers another way to monitor outcomes from USAID anticorruption programming.**

This method can be fairly quick and inexpensive and can focus on specific activities or processes targeted by a program. The

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<sup>56</sup> Geir Sundet, "Following the money: Do Public Expenditure Tracking Surveys matter?" U4 Issue 2008: <http://www.cmi.no/publications/file/3195-following-the-money.pdf>

data generated are only as good as the knowledge and professionalism of the experts, however, so their selection is an important factor in the validity of the measure.

Especially where interventions support sectoral programming, monitoring and evaluation may also seek to measure the development impact of anticorruption efforts. The development impact represents the result desired from reduced levels of corruption. In the health sector, the result could be lower infant mortality; in the education sector, it could be higher literacy rates; and in the environmental sector, it could be a higher ratio of tree coverage for the area targeted by the intervention. Depending on the specific intervention, a range of indicators could measure progress in achieving impacts.

The monitoring and evaluation effort ideally includes baseline and endline data to capture changes over time. As noted in the *USAID Evaluation Policy*, the use of a comparison group helps to rule out confounding factors by tracking the different outcomes for those targeted by the intervention and those not. Selecting target and comparison groups that are the same to begin with enhances the validity of the findings. Innovative evaluations in the field of anticorruption have used target and comparison municipalities, villages and communities in addressing corruption in elected mayors, political candidates, health clinics, schools, and road construction.<sup>57</sup>

Recent analyses of USAID programs show that many have had activities that could help reduce corruption. But the majority of these projects did not monitor their anticorruption activities explicitly through an anticorruption lens and did not set targets to assess their impact on corruption. Often, they made assumptions that their interventions helped reduce corruption without any measurable evidence. This omission represents a lost

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<sup>57</sup> Hannah et al.

opportunity to understand the contribution of different interventions for fighting corruption and how to maximize their impact. A notable exception are the MCC Threshold Country Programs which, more than many others supported by USAID, designed their activities with the specific goal of reducing corruption in given sectors and used sector-specific rating indicators such as the World Bank's Doing Business indicators, the Business Environment and Enterprise Performance Survey, the World Bank Worldwide Governance indicators, OECD/World Economic Forum Global Competitiveness Index indicators, and others.



## VII. CONCLUSIONS

When chronic corruption exists in a country, development programs are likely to suffer and risk not achieving their goals. As well, the host country's development trajectory is likely to be imperiled if corruption is not addressed in a forthright way. Therefore, programming and implementing targeted and appropriate anticorruption interventions is essential for strengthening governance, citizen engagement and economic growth. This Guide has discussed various tools that are available to help USAID programmers focus new initiatives effectively, and has reviewed the results of the research community to offer tips and illustrative approaches on the types of programs that appear to achieve anticorruption objectives under certain circumstances. The highlights of these findings are presented below:

**Tools.** This Guide offers USAID field officers a range of practical approaches and tools to ensure that corruption is dealt with suitably and anticorruption interventions are designed as needed in sectoral programs. Key approaches that can channel programming choices include the following:

- The USAID Anticorruption Strategy and DRG Strategy are good entry points for practical guidance on how to incorporate anticorruption objectives into USAID programming.
- The DRG database of USAID anticorruption project (from 2007-2013) can be accessed for examples of past efforts, how they were formulated, and how interventions were incorporated into sectoral projects.
- The USAID Anticorruption Assessment Handbook offers a set of systematic tools to uncover corruption vulnerabilities in the legal-institutional framework, to conduct political economy analysis, to map stakeholders, to

assess corruption risks sector-by-sector, and to examine the track record of potential interventions.

**Tips.** Analytical findings presented in this Guide offer practical programming tips to field officers on what might work and what to avoid in their particular country context.

- Explicit anticorruption objectives are highly valued
- Preventive initiatives tend to be effective
- Addressing grand corruption can have an impact
- Rule of law/judicial sector and private sector/economic growth anticorruption efforts tend to be successful
- Strong stakeholder political will can help in achieving anticorruption goals
- Success correlates with government political will and engaging with civil society and judicial stakeholders
- Make the reforms fit the context
- Less sensitive interventions might be pursued in politically challenging contexts
- Combining accountability mechanisms and sanctions for getting caught can be effective
- Comprehensive programs that promote both supply- and demand-side anticorruption initiatives may be more effective
- Reforms that focus on financial flows can be effective
- Reforms that streamline and standardize business processes can be effective
- Focused citizen engagement in anticorruption initiatives can be successful
- Infuse anticorruption objectives into sectoral programming and measure impact



# APPENDIX. USEFUL RESOURCES

## USAID resources

USAID Handbook on Fighting Corruption, 1999: [http://pdf.usaid.gov/pdf\\_docs/pnacr212.pdf](http://pdf.usaid.gov/pdf_docs/pnacr212.pdf)

USAID Anticorruption Assessment Handbook, 2009: [http://pdf.usaid.gov/pdf\\_docs/pa00jp37.pdf](http://pdf.usaid.gov/pdf_docs/pa00jp37.pdf)

USAID Anticorruption Strategy, 2005: [http://pdf.usaid.gov/pdf\\_docs/pdaca557.pdf](http://pdf.usaid.gov/pdf_docs/pdaca557.pdf)

USAID Handbook on Fighting Corruption, 1999: [http://pdf.usaid.gov/pdf\\_docs/pnacr212.pdf](http://pdf.usaid.gov/pdf_docs/pnacr212.pdf)

USAID Strategy on Democracy, Human Rights and Governance. - June 2013:  
[http://www.usaid.gov/sites/default/files/documents/1866/USAID%20DRG\\_%20final%20final%206-24%203%20\(1\).pdf](http://www.usaid.gov/sites/default/files/documents/1866/USAID%20DRG_%20final%20final%206-24%203%20(1).pdf)

The Handbook of Democracy and Governance Indicators, 1998:  
[http://pdf.usaid.gov/pdf\\_docs/PNACC390.pdf](http://pdf.usaid.gov/pdf_docs/PNACC390.pdf).

## Some non-USAID resources

International Foundation for Electoral Systems, Money and Politics Program - Guide to Applying Lessons Learned, 2006: <http://www.ifes.org/Content/Publications/Books/2006/Money-and-Politics-Program-Guide-to-Applying-Lessons-Learned.aspx>

OECD, Anti-Corruption Ethics and Compliance Handbook for Business, 2013:  
<http://www.oecd.org/corruption/anti-corruption-ethics-and-compliance-handbook-for-business.htm>

Transparency International and UN-HABITAT, Tools to support transparency in local governance, 2004:  
[http://www.transparency.org/whatwedo/pub/tools\\_to\\_support\\_transparency\\_in\\_local\\_governance](http://www.transparency.org/whatwedo/pub/tools_to_support_transparency_in_local_governance)

Transparency International, Handbook of good practices: Preventing corruption in humanitarian operations, 2010:  
[http://www.transparency.org/whatwedo/pub/handbook\\_of\\_good\\_practices\\_preventing\\_corruption\\_in\\_humanitarian\\_operations](http://www.transparency.org/whatwedo/pub/handbook_of_good_practices_preventing_corruption_in_humanitarian_operations)

United Nations Office on Drugs and Crime, UN Anti-Corruption Toolkit, 2004:  
[http://www.unodc.org/pdf/crime/corruption/toolkit/corruption\\_un\\_anti\\_corruption\\_toolkit\\_sep04.pdf](http://www.unodc.org/pdf/crime/corruption/toolkit/corruption_un_anti_corruption_toolkit_sep04.pdf)