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AFRICA BUREAU ANTI-CORRUPTION INITIATIVE (ACI) MID-TERM EVALUATION

FINAL REPORT

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ACRONYMS AND ABBREVIATIONS

ACDI (CIDA)	Agence Canadienne pour le Dévéloppement Internationale
ACI `	Anti-Corruption Initiative
ADVANCE	Advocacy, Awareness and Civic Empowerment Project (Nigeria)
AGOA	Africa Growth and Opportunity Act
ALCRER	Association de Lutte Contre le Racisme, l'Ethnocentrisme et le Régionalisme
APNAC	African Parliamentarians Network Against Corruption
ASYCUDA	Automated System for Customs Data
AU	African Union
BIANCO	Bureau Indépendant Anti-Corruption
BPE	Bureau of Public Enterprises
CGD	Center for Global Development
CIDA (ACDI)	Canadian International Development Agency
COMESA	Common Market for Eastern and Southern Africa
CSLCC	Conseil Supérieur de Lutte Contre La Corruption
CMVP	Cellule de Moralisation de la Vie Publique
DAC	Development Assistance Corporation
DAI	Development Alternatives, Inc
DANIDA	Danish International Development Agency
DFID	Department for International Development
DGE	Department of Government Ethics (Kenya)
DOJ	Department of Justice (USG)
DRC	Democratic Republic of Congo
EARA	East Africa Revenue Authorities
EBRD	European Bank for Reconstruction and Development
ECOWAS	Economic Community of West Africa
EU	European Union
FCP	Foreign Corrupt Practices Act (US)
FEAFFA	Federation of East African Freight Forwarding Associations
FONAC	Front des Organisations Anti-Corruption
GJLOS	Governance, Justice, Law and Order Sector
ICITAP	International Criminal Investigative Training Assistance Program
IDA	International Development Association
IDASA	Institute for Democracy in South Africa
IFES	International Foundation for Electoral Systems
IGF	Inspection Générale des Finances
INL	Bureau for International Narcotics and Law Enforcement Affairs
IRI	International Republican Institute
KISM	Kenya Institute of Supply Management
KIFWA	Kenya International Freight & Warehousing Association
MCA	Millennium Challenge Account
MCC	Millennium Challenge Corporation
MSI	Management Systems International
NEITI	Nigeria Extractive Industries Transparency Initiative
NEPAD	New Partnership for Africa's Development
NDI	National Democratic Institute
NGO	Non Governmental Organization
OECD	Organization for Economic Cooperation and Development

OPDAT	Office of Overseas Prosecutorial Development Assistance and Training (U.S. Department of Justice)
PADCO/AECOM	Planning and Development Collaborative International
PETS	Public Expenditure Tracking System (Tanzania)
REFORMS	Restructured Economic Framework for Openness Reform &Macroeconomic Stability (Nigeria)
REPOA	Research on Poverty Alleviation
RIG	Regional Inspector General (USAID)
RTI	Research Triangle Institute
RCSA	Regional Center for Southern Africa
REDSO/ESA	Regional Economic Development Services Office/ east and Southern Africa
SADC	Southern African Development Community
SAI	Supreme Audit Institution
SIDA	Swedish International Development Agency
SUNY	State University of New York
TI	Transparency International
UN	United Nations
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Program
UNODCC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development
USAID/EA	United States Agency for International Development, East Africa
USAID/WA	United States Agency for International Development, West Africa
WARP	West Africa Regional Program
WB	World Bank
WBES	World Business Environment Survey
WBI	World Bank Institute
WCO	World Customs Organization
WEAMU	West African Monetary Union
WTO	World Trade Organization

EXECUTIVE SUMMARY

Background

The Anti-Corruption Initiative (ACI) of USAID's Africa Bureau is a five-year program that began in FY2003. Its goal is to reduce corruption in selected countries in Sub-Saharan Africa that have embraced principles of good governance and demonstrated a commitment to reform. The ACI provides performance-based funding to nine countries: Benin, Nigeria, Rwanda, Kenya, Tanzania, Zambia, Mozambique, Madagascar, and South Africa. In addition, funding is provided to USAID's three regional offices in Sub-Saharan Africa to support region-wide projects and provide assistance to bilateral missions. Mission programming has focused on a wide range of areas, including activities directed at legal reform, civil society strengthening, increasing government capacity to fight corruption, enhancing the capacity of legislatures to monitor the executive, and increasing public awareness of petty and local level corruption. While on an annual, per-country basis, the ACI has a relatively small financial footprint, over its projected five-year lifespan it may disburse in excess of 45 million dollars.

In carrying out this mid-term evaluation of the ACI a two-person team visited nine USAID missions in seven countries during January and February of 2006: USAID-West Africa, USAID- East Africa, Ghana, Kenya, Bénin, Nigeria, South Africa, Madagascar and Tanzania. In addition, three missions (Rwanda, Mozambique and Zambia) submitted written answers to a set of questions concerning their experience with ACI supported programs. The following are some of the issues addressed by this evaluation:

- ACI implementation, performance and ongoing relevance;
- Value-added by the Initiative to anti-corruption programming in Sub-Saharan Africa;
- New programming opportunities;
- Earmarks versus integrated funding.

Findings

The Anti-Corruption Initiative has contributed to showing that:

- anti-corruption interventions can be integral components of core-funded programming and can be implemented with reasonable expectations of achieving results and impact;
- addressing patterns and practices that violate the public trust is within the manageable interests of Sub-Saharan Africa missions in programming for anti-corruption interventions; and
- participating missions are creating a useful model of CSO capacity building that emphasizes technical knowledge and skills.

From the combined experience of the missions that are receiving ACI support several lessons have emerged:

- With carefully crafted assistance directed at building analytical capacity and subject matter knowledge, civil society organizations can play a more substantive role in the effective implementation of anti-corruption activities.

- Promoting collaboration between civil society groups and legislative bodies is a constructive means of building the capacities of both types of organizations to institutionalize a shared commitment to transparency and accountability.
- Anti-corruption interventions can be effectively integrated into larger core-funded activities, e.g., health or education.
- Experience to date suggests that line ministry departments, audit authorities, and regulatory agencies provide important windows of opportunity in combating corruption.

Conclusions and Recommendations

The Anti-Corruption Initiative has helped to place the need for effective interventions to combat corruption in a more prominent position among USAID missions' programming priorities. It has enabled the recipient missions to generate a variety of approaches that have, in turn, led to a richer, experience-based understanding of the nature of the challenges that give rise to abuses of the public trust. Although there have been few formal efforts to exchange information outside the network of recipient missions, the impact of the Initiative can be inferred from the number of non-recipient missions that have plans to add anti-corruption programming in the near future.

The ACI should continue beyond 2007, and the Africa Bureau should consider making all Sub-Saharan African missions eligible to compete for funding. Funding should continue at current annual funding levels, with some flexibility so as to accommodate exceptional cases.

Recommendation 1. The ACI should be recast to give more direct attention to specific anti-corruption targets and reduce some of the current latitude for programming accordingly. Capacity-building for CSO should focus on increasing subject matter knowledge (budget, extractive industries, donor funding and activities) among civil society groups that will be working on anti-corruption issues.

Recommendation 2. Supply–side interventions need to be adjusted to more directly address issues of accountability and transparency in the legislature's relationships with the executive branch, e.g., identifying specific policy-level commitments by the executive branch to the independence of an anti-corruption function.

Recommendation 3. Missions should expand the factors considered in their due diligence with regard to political will and windows of opportunity to improve assessments of their political sustainability.

Recommendation 4. Mechanisms should be put in place to facilitate communications among recipient missions on programmatic issues and promote enhanced approaches to knowledge management:

- Create a website devoted to African anti-corruption programming experience;
- Explore leveraging possibilities of Leland Initiative resources;
- Create an internal (regional) anti-corruption working group to review experience, research, and evaluation findings.

Recommendation 5. In view of the pipeline management issues that are part of the recipients' experience to date, the Africa Bureau may wish to explore the feasibility of introducing some budgetary flexibility in the operating procedures for the Initiative during the first two years of ACI funding.

I.   INTRODUCTION

A.   BACKGROUND

The Africa Anti-Corruption Initiative (ACI) is a five-year program that began in FY2003. Its goal is to reduce corruption in selected countries in Sub-Saharan Africa that have embraced principles of good governance and demonstrated a commitment to reform. The ACI provides funding to nine countries: Benin, Nigeria, Rwanda, Kenya, Tanzania, Zambia, Mozambique, Madagascar, and South Africa. In addition, funding is provided to USAID's three regional missions in Sub-Saharan Africa to support region-wide projects and provide assistance to bilateral missions. Mission programming has focused on a wide range of areas, including legal reform, civil society strengthening, increased government capacity to fight corruption, enhanced capacity of legislatures to monitor the executive, and public awareness and other activities to decrease petty and local level corruption.

B.   EVALUATION OBJECTIVES

This mid-term evaluation of the Africa Bureau Anti-Corruption Initiative assesses the effectiveness of the Initiative as a funding tool, examines the bilateral and regional programs it supports, and provides recommendations on corrections and changes needed for the remainder of the ACI. It also considers the added value of the ACI to USAID missions and overall anti-corruption programming in Africa, explores opportunities that exist for the ACI during the final two years of program implementation, and identifies implementation problems affecting the various missions' performance in obligating funding, implementing activities, and demonstrating results. In addition, it responds to the question of whether or not continuing with a dedicated anti-corruption fund was more beneficial to USAID missions than integrating ACI resources into the overall Democracy and Governance budget. The full Statement of Work for the evaluation is provided in *Appendix 2*.

C.   EVALUATION METHODOLOGY

Field work for the evaluation was conducted during the months of January and February 2006 by Jesse McCorry (Team Leader) and Kevin Patrick. Katharyn Doherty collected data from the ACI recipient countries not visited and provided other home office research and logistical support. Prior to field work in Africa, the team reviewed project documentation and other relevant materials, interviewed USAID staff and project stakeholders in Washington, and finalized the work plan and interview guidelines.

The team worked with USAID to select locations for site visits that would expose them to a diverse spectrum of ACI recipient missions, allowing for Mission availability and scheduling conflicts. The team's itinerary included visits of approximately one-week each to Ghana[1], Benin, Nigeria, South Africa, Madagascar, Tanzania and Kenya. Typically, the visits included discussions with Mission Directors and USAID staff as well as interviews with as many local NGOs and stakeholders as possible within the time allotted.

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[1] Ghana was included despite not being an ACI recipient country to explore MCC anti-corruption activities and possible linkages to future ACI programming.

USAID missions in Rwanda, Mozambique and Zambia submitted written answers to a set of questions concerning their experience with ACI supported programs.

D.   REPORT ORGANIZATION

The following document presents the evaluation team's findings and recommendations with respect to the Anti-Corruption Initiative. *Chapter II*, Findings, is organized by issue area. Recommendations are presented in *Chapter III*.

The report is supported by six appendices. Mission Country Summaries, detailing mission specific program activities, progress and recommendations are provided in *Appendix 1*. The Statement of Work for the evaluation is provided in *Appendix 2*. Lists of individuals and organizations contacted, by location, and documents consulted are provided in *Appendix 3* and *Appendix 4*, respectively. *Appendix 5* contains the team's itinerary, and *Appendix 6* contains the list of questions that were sent to missions that were not covered by the field visits.

II.   FINDINGS

A.   PROGRAM CONCEPT AND DESIGN

1.   ACI Program Criteria

The goal of the Africa Bureau Anti-Corruption Initiative (ACI), as stated by the Bureau in guidance to participating USAID missions, is to reduce corruption in Sub-Saharan Africa by addressing the enabling environment for corruption. To achieve this goal, the initiative was envisioned to promote:

- public access to information;
- civic awareness and advocacy;
- transparent and accountable government procedures;
- effective government oversight institutions; and
- public-private dialogue.[2]

The ACI was expected to work in concert with related host government efforts dealing with the issue of corruption, such as the principles of good governance included in the New Partnership for Africa's Development (NEPAD) and the anti-corruption agendas of such institutions as the African Union (AU) and the Southern Africa Development Community (SADC).[3]

Despite its implicit programmatic breadth, the Initiative was not intended to address corruption in all of Sub-Saharan Africa. The determination of eligibility to submit an application for the Initiative was made by Washington-based staff. The guidelines for this process looked for the presence of three broad conditions in the countries of interest:

- U.S. foreign policy priority, determined by whether the country was a recipient of U.S. development assistance;
- Existence of favorable enabling environment, based on scores on the (World Bank) Governance Matters Index and the Freedom House Index; and
- Presence of government-citizen engagement to combat corruption, demonstrated by the existence of a national Poverty Reduction Strategy or other action plan agreed to with the World Bank, and by whether Transparency International had an office in the country.

USAID missions in 15 countries were invited to compete for ACI funding by submitting proposals for five-year programs. The three regional missions (USAID- Southern Africa, USAID- East Africa, and USAID-West Africa) would also receive a portion of the ACI funding, based on five-year work plans submitted on a non-competitive basis but evaluated by the same criteria as were used for the bilateral missions' proposals. These criteria were:

- Clearly defined window of opportunity to engage the corruption problem, including demonstrations of political will and civil society commitment to tackling corruption;
- Demonstrated capacity of mission to manage expanded portfolio;

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[2] "Anti-Corruption Initiative Proposals", Guidance to Posts: 01.30.03.
[3] *Ibid.*

- Demonstrated capacity of implementing partners to execute the program;
- Likelihood of success and demonstrable impact in five-year period; and
- Likelihood of generating innovation (including cross-sectoral approaches) and replicable models.

Although the Africa Bureau had initially expected to make six bilateral awards, funding for the first year of the Initiative was higher than anticipated, totaling $7.2 million instead of $5.5-6.0 million. The added resources made it possible to support a total of nine bilateral mission proposals (Benin, Kenya, Madagascar, Mozambique, Nigeria, Rwanda, South Africa, Tanzania, Zambia) in addition to the three regional programs. Funds began flowing to the successful missions in 2004 following final Congressional actions regarding appropriations for AID/W and the Agency's own allocation decisions. Actual allocations to the recipients of ACI funds varied, based upon the proposals submitted, ranging from $400,000 in the case of Bénin to $1,200,000 for South Africa. The regional missions each received $605,000. Although funds for subsequent years could not be guaranteed, missions made their programming decisions on the basis of the stated five-year project life.

Beyond the questions that arise with respect to the relationship between program effectiveness and funding, the ACI also raises questions because it was launched without a clearly stated strategy. [4] For a number of Africa Bureau staff, an important expected result from the ACI (but not a criterion for selection) was a heightened awareness of the need for more vigorous anti-corruption programming throughout Sub-Saharan Africa. This expectation grew from an acknowledgement that many USAID missions already had a record of anti-corruption efforts, and especially in championing the use of civil society organizations as advocates for greater transparency and accountability on the part of governments and public officials[5]. To some extent, however, this experience and the record were obscured by the fact that the majority of these efforts had been carried out within the context of larger programs. As can be seen in the chart showing component programming on the following page, every Mission decided to use some of its ACI allocation to enhance its work with civil society organizations.

Despite a few problems in several countries, USAID support for civil society appears to be an area where progress toward goals and objectives can be made without having to attend to high level political disruptions that are inherent risks of supply-side interventions. Kenya provides an instructive case in point. Seeing what it considered to be evidence of political will on the part of the Kenyan Government when it created a Department of Government Ethics (DGE) in the Presidency to advise and assist the President of Kenya on the development, implementation, and monitoring of anti-corruption strategies, USAID allocated a portion of its ACI funds to help make that department operational. The President appointed the former Director of Transparency International-Kenya to be the Permanent Secretary of DGE. Within two years of taking this post, however, the Permanent Secretary resigned and left the

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[4] Indeed, this was a criticism lodged by the GAO in its 2004 report on U. S. Government anti-corruption activities in Sub-Saharan Africa (Government Accountability Office, report to The Subcommittee on African Affairs, Committee on Foreign Relations, Foreign Assistance: U.S. Anti-Corruption Programs in Sub-Saharan Africa Will Require Time and Commitment: Washington, DC, April 2004. In 2005, USAID issued its comprehensive Anti-Corruption Strategy.

[5]This emphasis on supporting civil society and the general public in their role as demanders of public goods and services is often referred to as a "demand-side" intervention. The term "supply-side" intervention, by contrast, is used to describe interventions that enhance a government's ability to treat as legitimate and respond to citizen demands for public goods and services.

country. His departure led to the resignations of a number of key staff members, rendering the DGE essentially non-functional. The Kenya Mission withdrew its support for the Department and reallocated ACI funding to a legislative and civil society capacity-building effort focused on strengthening collaboration between civil society organizations and the Kenyan legislature. One cannot know what might have been achieved by supporting the DGE, but the experience to date suggests that ACI support has strengthened the capacity of several important civil society organizations to deal with anti-corruption issues and to work directly with staff and elected members of the legislative branch to enable a more viable counterweight to the executive branch.

2.   Anti-Corruption Strategy and the Programming Framework

The Africa Bureau made it clear from the outset that ongoing funding for a mission's ACI-supported interventions would be based upon performance. It was also acknowledged that the Initiative would have a relatively small financial footprint. In spite of the relatively limited funding, or perhaps because of it, the Africa Bureau demonstrated some creativity by inviting missions to compete for funds. In this way, the Bureau could be reasonably assured that it would be dealing with a motivated set of missions in the pool of applicants. The Initiative's designers expected this motivation to stimulate creative approaches to leveraging other financial resources, either from within the missions' portfolios, from other USG funds, or through the participation of other international donors. The five-year life span of the ACI, seen by some as too brief relative to the nature of the problems being addressed, was consistent with commonly employed USAID programming parameters.

In fact, political conditions in several ACI recipient countries changed to such an extent between 2003 and 2005 that original programming decisions had to be modified and funding reallocated to other activities. Inevitably, such changes had an adverse impact on the ability of some missions to obligate their funds in a timely manner, and the slower "burn rates" that resulted led some in Washington to conclude that ACI support was not being utilized effectively. Of perhaps greater consequence for the missions were the effects that these changes had on the performance targets that had been established for their anti-corruption interventions. For four of the bilateral missions visited by the evaluation team[6], the ability to show progress against performance targets was also adversely affected by problems with implementing partners, which meant that a number of activities could not be initiated according to program designs and previously agreed upon implementation schedules. Together, these problems constituted a significant issue for the affected missions given the weight given by the Africa Bureau to performance in considering subsequent requests for funding.

While a unified strategy for the Anti-Corruption Initiative may not have been specifically articulated, some elements of a strategy, and the robust ACI programming framework derived from the eligibility criteria, can be found in the formative document *USAID/AFR: Anti-Corruption Initiative*[7]. These elements can be summarized as follows:

- direct programming to reduce opportunities for corrupt practices;
- influencing the enabling environment for corruption through preventive interventions; and

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[6] Nigeria, Benin, South Africa, and Kenya. The team also learned that RCSA, which was not visited, had encountered problems with its implementing partner.

[7] USAID/AFR *Anti-Corruption Initiative,* (Final Draft), March 2003:13.

- leveraging donor resources and capitalizing on existing anti-corruption and DG programs.

Indeed, the activities supported by the Initiative closely follow the strategic directions of either seeking to directly reduce corrupt practices or supporting actions that, through preventive measures, would constrain the spread of an enabling environment for corruption. The actual interventions cover 14 of the 22 types that USAID/DG identified in its 2003 inventory of anti-corruption activities worldwide.

The Africa Bureau and the missions understood that, while programming would take place within contexts informed by existing strategies and objectives, considerable space remained for defining specific activities that would incorporate the above elements in various configurations. Finally, programming choices had to take into account the management requirements of any proposed activity, e.g., that, for the most part, the interventions would be executed by "implementing partners" with minimal direct Mission involvement.

As shown in the following table, the various bilateral mission interventions can be viewed as anti-corruption "packages" containing several discrete components. For the most part, missions grafted their ACI-funded interventions onto existing Democracy and Governance programs and utilized the same implementing partners, thus avoiding the start-up delays associated with open competitive procurements. The inherent caution of this approach is understandable given the steady decline in mission resources for the Democracy and Governance component of their portfolios. In having the latitude to incorporate a specific anti-corruption intervention into an existing program, missions could ensure that the new activity fit comfortably within the bounds of existing Strategic Objectives and program priorities.

ACI Programming by Mission: 2003-06[8]

Mission	CSO	Legislature	Executive/ Administration	Judiciary	Media	Private Sector
USAID/WA	?					?
Bénin	?		?	?		
Nigeria	?				?	
South Africa	?	?		?	?	?
Madagascar	?		?			
Tanzania	?	?	?			
USAID/EA	?					?
Kenya	?	?	?		?	
Mozambique	?		?			
Rwanda	?		?			
Zambia	?	?			?	

For example, Bénin incorporated an anti-corruption element into a major ongoing activity that addressed early childhood and primary education. It also developed specific interventions to strengthen the audit capacities of the government and the enforcement capability of the judiciary. In Rwanda, anti-corruption funding seeks to address the twin issues of accountability and transparency through support for a large-

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[8] The table distinguishes Media and Private Sector programming from CSO programming for the purposes of showing detail. In ordinary usage, each of these entities is subsumed under the broader civil society designation.

scale decentralization program that pre-dates the Initiative and illustrates the feasibility of integrating anti-corruption elements into ongoing activitie s. And in USAID/WA, ACI funds broadened existing efforts dealing with conflict mitigation and procurement of medical supplies and services. Similarly, in South Africa and Zambia ACI funding has enabled these missions to enhance pre-Initiative anti-corruption programming based on consultations with their civil society and government partners, e.g., South Africa's engagement with Business Against Crime and the Local Government Department and Zambia's expanded work with media organizations and the legislature. In some instances where ACI funds are not directly supporting media efforts, e.g., Kenya, assistance to CSOs has resulted in the preparation of reports and other information that are used by media outlets to increase public awareness of the importance of anti-corruption activities.

B. IMPLEMENTATION OF THE INITIATIVE

1. Civil Society Orientation[9]

In general, the bilateral recipients of ACI funding have focused their anti-corruption programming on activities designed to build the capacity of civil society organizations to advocate for improved government accountability and transparency. It is important to underline the involvement of media groups and business organizations in these efforts, as individually and in concert they have a role in reducing the enabling environment for corrupt activities. The regional programs have a comparable civil society orientation. USAID/EA is also actively engaged with private sector entities, e.g., business organizations in Kenya and Tanzania that represent most of the freight forwarders involved in the Northern Corridor project, while USAID/WA has translated its cross-border concerns into a capacity building effort for CSOs that also addresses conflict mitigation and the potential for abusive procurement practices in the delivery of health services and supplies and developing an Information Technology-based network to enhance communications among network members.

The emphasis on civil society strengthening among the several sets of activities is a reflection of the comparative advantage of USAID bilateral missions relative to other donors. Nonetheless, as these organizations and the missions acquire additional experience in building the capacity of CSOs to address corruption through effective advocacy and accountability monitoring, implementing partners such as PACT and their collaborators are recognizing the importance of utilizing technical knowledge and specialized skills in their capacity building efforts. Acquiring such expertise may help address some of the criticisms the team heard about the limited effectiveness of some of the civil society groups working in the anti-corruption area in several countries, including Nigeria, Tanzania, Madagascar and South Africa.

In some countries, efforts are being made to create stronger collaborative relationships that involve two or more implementing partners where the skill sets compensate for deficiencies among the principal partners. This would seem to be the case with Policy Forum, REPOA and IDASA in Tanzania, and with Proje ct ADVANCE (PACT) and ActionAid/Nigeria. As missions proceed with their anti-corruption efforts, such collaboration merits careful attention for manageability and effectiveness. From all indications, the cost of this type of partnership arrangement does not appear to be excessive. The sub-

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[9] The implementation of ACI reflects a number of the recommendations for anti-corruption programming contained in an assessment of Mission experience in this area during 2004 (Management Systems International, A Rapid Anti-Corruption Assessment Technique for the USAID Africa Bureau, Washington, DC: February 2005.)

grants and associate mechanisms reduce the management burden on limited personnel resources in the missions. The experience with the sub-grant process to date suggests that it is, on the whole, an efficient means of providing financial assistance to local civil society and host government partners.

It seems clear that civil society strengthening will continue to be a critical component of USAID anti-corruption efforts. Moreover, among some non-ACI recipients there appears to be a growing recognition of the expanded roles that CSOs can play in promoting transparency and accountability, and thereby diminishing the enabling environment for corruption and promoting advances toward other good governance objectives.

For example, in the Democratic Republic of Congo (DRC), which is not a recipient of ACI support, civil society is involved in a USAID-funded effort to reduce corrupt practices affecting trucking costs on a major transport route that feeds the economic activities of three important provinces. And in Mali, where USAID previously had no specific anti-corruption focus in its core programs, steps have recently been taken to forge supply-side and demand-side linkages to promote anti-corruption efforts involving civil society, the media and the nation's judiciary.

Through various program configurations, the recipients of ACI support for civil society organizations seem poised to take on more substantive and technical responsibilities in the areas of monitoring government performance in addition to enhancing their roles in advocacy. Bénin, for example, has seen one of its local partners develop programs for elementary and middle-school students and for local elected officials on how to recognize corrupt practices. At a somewhat higher level of sophistication, local NGOs and the broadcast media collaborated in producing a televised anti-corruption event for a national audience.

2.   Opportunities and Challenges

The following discussion highlights two ACI-funded approaches to combating corruption – legislative oversight and CSO institutional development -- that may be suitable for replication in other Sub-Saharan African countries. In addition, the discussion identifies corruption in extractive industries as an emergent theme that may represent a challenge for USAID/ACI programming not only because of its economic importance, but also because it can focus attention on the nexus between the private and public sectors and the extent of corruption in a nation's economic sphere. [10] For both opportunities and challenges, however, a common weakness seems to be the absence of a mechanism to exchange relevant programmatic information among the ACI recipients, as well as within the larger group of missions in Sub-Saharan Africa.

a.   *Legislative Capacity: Oversight and Organizational Development*

Several ACI recipient missions are beginning to show progress and early results in their efforts to help legislatures play a meaningful role in the political process. Support from the Initiative has facilitated the participation of national legislatures in regional organizations such as APNAC[11], which seeks to address

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[10] See USAID Anti-Corruption Strategy, Washington, DC: January 2005, p.8, for further discussion of this issue.
[11] The African Parliamentarians Network Against Corruption grew out of earlier discussions among member-states in the Global Organization of Parliamentarians Against Corruption (GOPAC).

corruption issues through legislative agenda-setting. While many of the current mission activities are concerned with national legislatures, it is important to note that provincial legislative bodies and local government councils are also beneficiaries of USAID support in furtherance of anti-corruption objectives. As one would expect, there are particular points of emphasis based upon national contexts that differentiate these activities from one country to the next. In some cases, Kenya for example, the implementing partners provide both capacity building assistance and legislative drafting support with the intent of creating an effective counterweight to executive dominance of the country's political space. Zambia is also working with APNAC and the legislature in developing a capacity to deliver constituency services as a means of securing more direct community involvement in addressing issues of administrative corruption; however, this effort has encountered some problems at the implementation level resulting in slower progress than had been anticipated. And in Rwanda and Benin, the missions are making significant investments in strengthening the anti-corruption elements in their decentralization programs by working with local officials and legislative councils.

Legislative Capacity
Tanzania
Kenya
South Africa
Zambia

Similarly, South Africa's early ACI-funded support for the Auditor-General Department's work to strengthen oversight of public accounts among the provincial governments helped to train a number of the members in these bodies. Enhancing the capacity of legislatures to effectively perform their oversight responsibilities and to play a more substantive role in policy-making is receiving increased attention in anti-corruption interventions. Missions, such as those listed in the above table, are gaining experience in creating conditions where civil society and legislative bodies can collaborate to their mutual benefit. At this point, however, these relationships are still evolving and their results are not definitive. Nonetheless, this conjunction of demand-side and supply-side interventions could become an area of comparative USAID advantage for USAID. Assistance of this sort, over time, could also serve to address some of the distribution of powers issues among the legislative and executive branches of government, especially on budget management where the legislative branch has played a limited role. This approach, with careful program design, may also become a useful vehicle for addressing issues of ethics and corruption that beset some legislatures.

One indicator of the Initiative's progress may arise from the acquisition by legislators of a better understanding of national budgets and expenditures leading to better informed questioning of government policy and priorities, while another is likely to derive from the growth in collaboration between the legislative bodies and the specialized or technically-informed civil society groups that are working with them within the anti-corruption framework. An illustration of this type of outcome can be found in Tanzania's use of a Public Expenditure Tracking System (PETS) as a mechanism for bringing civil society and members of Parliament into a partnership for increased government accountability and transparency. In addition, SUNY-Tanzania, another USAID/Tanzania implementing partner, has developed specific activities that allow civil society organizations to directly present their legislative and social development agendas to members of the national legislature.

The countries and programs cited here are noteworthy because of the working relationships that have been developed and cooperative efforts that have been carried out in the area of legislative oversight, which in turn have served as a vehicle for forging linkages between the ACI and African regional bodies such as APNAC and SADC. For example, SUNY-Albany and the Auditor-General's department in South Africa are providing complementary technical assistance with regard to public accounts in East and Southern Africa. These resources might also be of value to efforts in the West Africa sub-region where the network of working relationships does not appear to be as well-developed.

b. CSO Institutional Development

The institutional development of civil society organizations is a common activity for ACI recipients. Again, there are distinctions based upon national settings as well as on mission goals and objectives. However, for each of the countries listed in the table below, the activity seeks to enhance the abilities of civil society to advocate effectively for transparency and accountability with executive branch agencies or legislative committees by equipping CSOs with the appropriate technical skills and knowledge (especially in those instances where the goal is to have the CSO directly involved in the deliberative process). Examples can be seen in Rwanda and Bénin with regard to decentralization, and in Tanzania, Nigeria and South Africa, where the focus is primarily on public expenditure accountability and local and provincial government operations.

CSO Institutional Development
Tanzania
Bénin
South Africa
Kenya
Nigeria
Rwanda
Zambia

While this investment in the development of CSOs has contributed to some important achievements, e.g., the Publish What You Pay Coalition's direct involvement in the work of the Nigeria Extractive Industries Initiative, it has also revealed some significant areas of weakness in the capacity of CSOs to engage in anti-corruption efforts. Many of the CSOs involved are relatively new organizations. They tend to have limited financial resources and their lack of substantive knowledge in anti-corruption issue areas limits their effectiveness in engaging with a legislative body or a national commission.

ACI has helped fund several civil society capacity-building activities that hold promise for addressing these challenges. Strengthening linkages of CSOs with legislatures, and with local governments through decentralization programs, or establishing local offices in member constituencies, may lead to increased accountability and transparency in other government institutions while simultaneously enhancing the technical and operational capacities of the legislative and local governing bodies themselves. Specifically, the experience of organizations such as the Center for Global Development (CGD) and the State University of New York (SUNY) in Kenya demonstrates how CSOs and implementing partners can become valuable resources for technical and analytical support to strengthen legislative bodies. A similar relationship has emerged in Tanzania, where USAID support has played a major role in the creation of the Tanzanian Government Noticeboard (TGN). This publicly accessible database provides extensive

information on national finances, including some details on donor-financed activities. With training in its use, the TGN has significant potential to level the playing field of policy development by providing legislatures, decentralized institutions of government, and civil society with critical information with which to make decisions or recommendations concerning resource allocations.

Although the media sector is not, in relative terms, a major recipient of ACI support, the Initiative does allocate some resources to news media and has been able to leverage resources from other parts of mission portfolios to add capacity for training in investigative journalism. Formal programs, such as that involving the University of The Witswatersrand and Rhodes University in South Africa, can help to position African journalists and others in an international network of professional journalists and journalism training institutions. This support from ACI has contributed to successes in uncovering cases of abuse of the public trust in countries such as Bénin, South Africa, and Kenya.

In a different context provided by developments in Kenya, the Initiative enabled the Mission to turn a difficult situation —the abrupt departure of the head of the Department of Government Ethics that was supported by ACI— into an opportunity to enhance its support for legislative strengthening, and government accountability, specifically for strengthening the legislature's capacity to discharge its responsibility for managing public accounts. This new effort has also created opportunities for several local CSOs to provide direct technical support to legislative committees in the areas of legislative drafting and legislative analysis.

c.   *Extractive Industries*

This thematic area is viewed as a challenge because the affected missions, with the exception of Nigeria, are relatively new to the range of issues that arise when dealing with the lack of transparency and accountability in extractive industries, which have themselves only recently assumed importance in these countries' respective national economies. It is interesting that, for most of the missions in this grouping, it was the host country that initiated the discussions regarding USAID assistance. Madagascar is moving into exploration for oil and natural gas deposits in areas of the Mozambique Channel, for example, while in Tanzania concern is growing with regard to control of timber exploitation and mining for certain high value gemstones, gold and other minerals.. The Nigeria Mission, on the other hand, has been dealing with issues related to the oil industry over a period of years and, in the process, has developed collaborative activities with expatriate firms working in these industries.

Extractive Industries
Nigeria
Tanzania
Madagascar

Nigeria's experience with the Nigeria Extractive Industries Transparency Initiative (NEITI) and the Economic and Financial Crimes Commission may also offer some instructive insights for countries that are still formulating their approaches to these issues. USAID/Nigeria is providing prosecutorial support (other USG resources are also employed) and CSO capacity building for accountability and transparency purposes. In the case of NEITI, this includes supporting the participation of Publish What You Pay (PWYP), a CSO, in the stakeholders group that works directly with the NEITI staff.

With the exception of Nigeria, this is a prospective area where anti-corruption resources might be usefully invested. The value of the sector to the national economies is growing significantly and reports of corruption are also becoming more frequent. The sector is also one where an anti-corruption intervention could directly engage important parts of the business community at an early stage, before questionable practices have become institutionalized.

Finally, in some cases, the complexity of anti-corruption programming in this sector needs multi-disciplinary input. For example, in seeking to expand programming to the Great Lakes region, an important node on the Northern Corridor, USAID-EA has found it crucial to take into account the role of contested natural resources in fueling conflict. However, the mission found that treating extractive industries as a trade and transport issue integrated into a larger regional program may reduce the intensity of some of the socio-political and economic and concerns associated with this sector.

3.   Is the ACI on Track to Achieve its Goals through FY 2007?

The goals of The Initiative that were established in 2003 are clear:[12]

- Increased access to information;
- Increased citizen participation in, and oversight of, key government decision-making processes;
- Increased public trust in democratic institutions;
- More streamlined, transparent, and accountable governmental administrative processes;
- More targeted anti-corruption policies, protocols, and laws, including concrete action plans and public-private mechanisms designed to regularly report on and monitor the implementation of reforms;
- More effective and broad-based advocacy networks at both the country and regional levels.

As a general matter, the answer to the question of whether the ACI is on track to achieve these goals by FY 2007 is affirmative. The ACI target was for four of the 12 missions to register some positive impacts in 2005. The performance of a majority of the missions was better than had been anticipated. Seven ACI recipients[13] achieved measurable impacts with regard to civil society strengthening. In addition, several of these countries are also showing modest positive results in helping legislatures to assume a more robust role in national governance through a variety of capacity enhancement interventions. And while it was not a stated goal, the recipient missions are becoming a valuable knowledge resource for USAID generally, stemming from their combined experience in anti-corruption programming and activity implementation.

Moreover, as discussed in the *Second Annual Report[14],* a majority of the missions have produced demonstrable lower-level results from ACI-funded programs, e.g. those dealing with prosecutorial outcomes and some types of increased transparency and accountability. For example, South Africa's Specialized Commercial Crimes Court, with support from USAID and Business Against Crime (BAC), has initiated a number of prosecutions and has achieved an impressive record of success in these actions. In Madagascar, the Bureau Indépendant Anti-Corruption (BIANCO) exceeded its initial targets for administrative processing of the more than 8,000 complaints it received from throughout the country.

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[12] USAID/AFR *Anti-Corruption Initiative Final Draft:* March 2003.
[13] Benin, Madagascar, South Africa, Zambia, Kenya, Tanzania and Nigeria.
[14] Management Systems International, Africa Anti-Corruption Initiative (ACI: Second Annual Report, December 2005

However, at the time of the evaluation none of these cases were being prosecuted.[15] BIANCO also pointed out that its ability to take action against some complaints was constrained by laws that exclude offenses that took place before the election of the current president.

Kenya's media and civil society organizations have been effective in their respective roles for promoting accountability and transparency. The media, although not direct recipients of ACI financial support, have aggressively reported on official corruption of both the grand and administrative varieties, with emphasis on the former type.[16] Unfortunately, the political will that had many believed was present in the current Kenyan Government has not manifested itself in the bringing of formal charges and successful prosecutions for abuse of public office, nor has it proved to be sufficiently durable to sustain other institutional attempts to reduce the enabling environment for corruption in Kenya.

It is possible that a number of missions will "mainstream" their programming on anti-corruption and broader concerns regarding Democracy and Governance over the next few years. Bénin, for example, has decided to make anti-corruption an integral component of its overall strategic approach while dispensing with a specific strategic objective for Democracy and Governance. This decision was based on funding cuts to the Mission's Democracy and Governance strategic objective and its conclusion that a broad-gauged "social" approach —capitalizing on Mission expertise and comparative advantage — could be a useful means of combating corruption so deeply-rooted in the local culture. While this was the only country visited to take such a categorical position, other informal conversations suggest that similar decisions may be forthcoming in other countries. Such a change may have only a limited effect on ACI programming, however, as a number of recipients already use their funds in non-DG sectors.

Nevertheless, it must be noted that four of the nine bilateral recipients experienced serious implementation problems that resulted in delays in the scheduled programming of proposed activities. Moreover, the inability of one regional office to fill the position of anti-corruption specialist limited the amount of technical assistance that could be provided to countries within that region.

The evaluators found no indication that these implementation problems arose from systemic or design weaknesses in the Initiative. Nevertheless, because they combined in such a manner as to give a somewhat distorted view of the recipient missions' financial management abilities, it is helpful to indicate the nature of the difficulties that were encountered in the affected missions:

- USAID/Bénin's implementing partner had to replace its chief of party shortly after signing the contract with the mission for the grants administration component of its intervention;
- In South Africa, an implementing partner working on enhancing capacity in a key government department was terminated on grounds of non-performance, and a proposed area of intervention

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[15] According to BIANCO officials, there are some constitutional particularities related to the statute of limitations that may impede their ability to bring charges against past acts of corruption. A similar situation exists in Bénin (without the constitutional complication), where it appears that cases are not being prosecuted due to inadequate resources.

[16] We should note that USAID/Kenya has not directly funded any media organizations. However, the Mission, with ACI funds, has funded NGOs that have conducted studies and produced reports that have been covered by the media, and thus have contributed to the overall media reporting on corruption.

involving local governments had to be halted on the advice of government officials when
episodes of urban unrest became widespread;

- In Nigeria, disagreements between a lead contractor and its principal sub-contractor led to delays
  in naming a chief of party and the start of a critical transparency and accountability intervention;
- The Kenya mission (as well as some donor partners) was compelled to reallocate part of its ACI
  funding due to a change in leadership within an important government office that had been seen
  as a potentially critical contributor to a successful supply-side intervention to combat official
  corruption; and
- USAID/WA has been unable to secure the services of an anti-corruption specialist.

In each instance involving a bilateral mission, the problems were satisfactorily resolved, but the working
environment for collaboration with local civil society organizations was adversely affected, especially
since for these important participants the resulting delays imposed a perceptible financial hardship that
could diminish their potential to contribute to an activity's objectives or intermediate results. In a related
manner, disbursement of funds was interrupted, leading to blockages in ACI pipelines which had
consequences for the pace of progress toward the achievement of expected results. Moreover,
cumulatively, the slowdown in disbursements on the part of these five missions could easily be
interpreted as a weakness of the entire Initiative.

As mentioned earlier, nothing in these difficult situations suggests a systemic, programmatic flaw in the
Initiative or the programming choices that have been made. At the same time, it is clear that when
missions are confronted with a potential (or actual) reduction in ongoing funds, modifications to multi-
year program commitments at the mission level are an almost inevitable result. Under such circumstances,
the original logical linkages and relationships among activities, intermediate results and objectives can
also be disrupted, leading to lower levels of performance and achievement.

4.   Cooperation and Coordination with Other Donors

The experience of Tanzania and Kenya provides examples of a systematic approach to donor coordination
on the broad range of Anti-Corruption, Democracy and Governance, and Human Rights issues through
membership and participation in the Legal Sector Working Group (LSWG) in Tanzania and the
Governance, Justice and Law and Order Sector (GJLOS) Reform Program in Kenya[17]. For example, in
Tanzania, the Department of International Development (DFID) is supporting a Mission initiative for an
enhanced Public Expenditure Tracking System as part of the Local Government Reform Program.
Although DFID does not provide direct financial support to the USAID intervention, its assistance to the
Public Expenditure Tracking System (PETS) at the district level has the potential to enhance the
effectiveness of the ACI investment in the Tanzania Government Notice Board project.

However, it should be noted that missions also successfully maintain contacts with bilateral and
multilateral donor organizations outside the frameworks provided by these structured mechanisms. The
effectiveness of the relationship depends not only on the size of the USAID financial commitment, but
also on the recognition by other donors in this peer group of USAID's experience and expertise in the
relevant issue areas. This recognition from other donors is an asset that contributes to USAID's success in

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[17] USAID/Kenya uses DA/ESF to support this program. This appears to be another example of complementarity and
the leveraging capacity of the ACI.

leveraging development partners' funds or other support for its priorities. For example, donor countries seem to increasingly favor "basket funds," a form of pooling resources dedicated to a given development sector. As a rule, USAID does not co-mingle its funds in these "baskets." However, it often will make a distinct and identifiable allocation to an element of the sector that is consistent with USG objectives.

An issue that may affect the ability of a Mission to forge effective relationships across the donor community relates to the compatibility of donor strategies for combating corruption. USAID's own Anticorruption Strategy cautions against expecting too much from anti-corruption commissions and broad national anti-corruption plans.[18] However, these instruments, in concert with national poverty reduction strategies, integrated financial management plans, and the like, have considerable importance to the host country because they are often prerequisites for receiving major development assistance from multilateral organizations, such as the World Bank and the IMF. Actual incompatibility of the USAID approach to ACI programming (or to development assistance more generally) with those of other donors does not appear to be an issue. However, some donors, e.g., Norway, are less inclined to use civil society organizations as implementing partners for their interventions, preferring instead to work directly through the host country government. In this connection, the Norwegian government avoids the use of earmarks in making its programming decisions. Nevertheless, this difference does not inhibit collaboration, as shown, for example, by the case of NORAD working with TGN in Tanzania, or the broad donor support to BIANCO and CSLCC in Madagascar where NORAD, the EU, The World Bank, Switzerland, Japan, UNDP are involved along with USAID.

What seems to contribute most importantly to effective USAID coordination with other donors is an active and well-informed Mission engagement with its counterparts. While we've mentioned the structured approaches of Tanzania and Kenya in positive terms, we also found examples of effectiveness in South Africa, which did not have such a structure.

5. ACI Funding as a Vehicle for Policy Dialogue with Governments

In both Madagascar and South Africa, awareness of ACI-funded activities has figured in policy dialogue between host governments, and between the USAID mission and the Ambassador and other US Embassy personnel. These discussions have identified potential opportunities for USAID to broaden its anti-corruption interventions into areas that had escaped notice during the initial round of programming decisions. In the case of South Africa, the team learned of an interest in border control matters that could involve trafficking in persons as well administrative corruption. Leaving aside any implications of Congressional prohibitions on using USAID funds to support police functions, this could provide an opening for USAID to engage with other USG entities in a policy dialogue with host officials on such matters. In the Madagascar case, exposure to the Mission's ACI activities led Madagascar Government officials to inquire about obtaining technical assistance from Pretoria for the Commercial Crimes Court and the adaptability of a South African legislative model to strengthen the operational and prosecutorial capacities of BIANCO, Madagascar's ACI-supported anti-corruption organization.

More directly, however, ACI provides missions with manifold opportunities for policy dialogue at the operational level. Implementing partners' discussions with their government counterparts on matters of program execution frequently open up space for dialogue between USAID and the host country at the

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[18] Anticorruption Strategy, p. 13.

policy level. Although such interactions are not unique to the Initiative, the ACI can add an important dimension to the ensuing conversations in that it can be a tool for assessing a country's political will or for identifying new windows of opportunity to combat corruption.

6. Added Value of ACI

The critical value added by ACI is in the financial resources it has provided for anti-corruption programming in the nine Sub-Saharan missions and three regional offices. In this respect, it is unlikely that the ACI-funded activities would have been put in place by the recipient missions without these additional resources. It is also evident that the ACI has helped to make anti-corruption programming a more visible component of the recipient missions' development agendas. In Nigeria, for example, USAID financial support helped to place a civil society representative in the office of the Extractive Industries Transparency Initiative. The Senior Anti-corruption Advisor in USAID/EA has been actively engaged in providing technical support to bilateral missions, government entities such as the Tanzania Revenue Authority, and COMESA. Similarly, the Initiative has allowed USAID/WA to enhance its efforts to identify and address targets of opportunity involving procurement issues in its ARV program. Thus, for a host country, regional bodies, or donor colleagues, the ACI may have added value by providing them with a clearer perception of opportunities for collaboration or enhanced coordination with USAID.

The designers of the Initiative analyzed the collective experience of USAID missions in the broad area of anti-corruption interventions and used the results in establishing the parameters of this targeted approach. The availability of this information contributed to the relative speed with which the recipient missions were able to develop their proposals and launch their interventions. Added value also came in the form of centrally provided technical assistance on anti-corruption programming and evaluation issues in the early stages of implementation. This meant that the majority of the funds that were made available could be directed specifically to addressing the programs' goals and objectives.

In sum, The Initiative has added value on two levels: the Mission level and the Bureau level. At the Mission level:

- Value has been added through raising the awareness of the importance of anti-corruption efforts to the effectiveness of sector development concerns outside the strict confines of Democracy and Governance programming. The design of the Initiative took this into account by encouraging cross-sector programming and leveraging of resources. Examples of missions taking this to heart are Benin, South Africa, Rwanda and Kenya, among others.[19]
- Current ACI interventions involve all areas of USAID sector work.
- ACI has demonstrated its continued relevance as more missions give increasing attention to anti-corruption programming possibilities in formulating their country development strategies

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[19] Zambia provides an interesting example of these points in practice. The mission has contributed approximately one million dollars since 2002 (more than half of which was from the Initiative) to a multi-donor parliamentary reform effort co-funded with about $4 million from other donors and about $500,000 from the Zambian Parliament. All of these funds, including those from Parliament, were programmed through Pact, the USAID implementing partner, through the cooperative agreement mechanism. This created a de facto "basket" that also followed USG segregated accounting rules.

At the Bureau level:

- The Africa Bureau has added value by providing carefully crafted responses to several criticisms of USG anti-corruption efforts in Sub-Saharan Africa.
- The Bureau has shown "political will" in demonstrating USAID's long-term commitment to combating corruption in Sub-Saharan Africa. Continuation of ACI would underscore that commitment, and would be especially valuable in further enhancing the abilities of civil society groups and organizations that are needed to ensure transparency and accountability among institutions of governance.
- Bureau resources are adding value by supporting mission efforts, and working to establish linkages with the Millennium Challenge Account in the development of Threshold Country programming.

7. Implementation and Programmatic Differences between Bilateral and Regional Missions

In the specific context presented by ACI programming, USAID/EA seems to have been more agile than USAID/WA in capitalizing on the Initiative. The Northern Corridor transport project, which was already operational, was fertile ground for the use of ACI resources. Moreover, USAID/EA's decision to use ACI funding to hire an Anti-Corruption Advisor undoubtedly helped this regional Mission to identify and act on opportunities that addressed some important issues in anti-corruption programming. ACI support also allowed USAID/EA to broaden its assistance to industry and government offices through the introduction of specialized software for handling customs duties and related fees on commercial shipments.

USAID/WA now appears to be moving in a similar direction, given plans to hire someone to take responsibility for managing its current and planned anti-corruption activities, especially with respect to its growing involvement with São Tomé and Principé. There may also be possible synergies between USAID/EA and USAID/WA as the West Africa office has become engaged with some regional transportation issues that seem comparable to those being addressed in USAID/EA's Northern Corridor Project.[20]

Since USAID/EA is the only mission visited that currently employs an anti-corruption advisor, no useful judgment can be made concerning the position's value across missions. In the main, missions seem to have favored using ACI resources for program activities rather than personnel. It is also worth keeping in mind that authorizations to employ new personnel may have posed significant difficulties for interested missions.

The ACI has the potential to enhance exchanges and collaboration between the bilateral and regional missions. For example, the Northern Corridor transport project provided opportunities for USAID/EA and the East Africa bilateral missions to become familiar with one another's anti-corruption interests and perspectives. It is also worth noting that there were some differences between the regional programs and the bilateral missions concerning the relative merits of integrating the former's ACI resources into existing bilateral programming versus using them as programming "gap-fillers". As a practical matter, the

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[20] Time and logistics made it impossible for the evaluation team to include RCSA in its site visits. As a result, this Regional Office is not specifically discussed in the evaluation.

regional programs' interventions, while complementary in many respects, tend to reflect their responsibilities over a broader range of political environments. More generally, however, there do not seem to have been significant substantive grounds for regular interaction between the regional offices and the bilateral missions.

8. Anti-Corruption Programming in Non-ACI Recipient Countries

The Statement of Work called for the evaluators to compare the results of programs in ACI recipient countries with the results of anti-corruption programming in a non-recipient country. Ghana was initially selected as the "control" case because, although it was host to a regional Mission (USAID/WA) and thus included in the evaluation team's itinerary, the bilateral Mission did not participate in the Initiative. In fact, Ghana had no specific anti-corruption programming at the time of the evaluation team's visit. In discussions with members of the USAID staff, the team learned that an impediment to moving forward in this area was a perceived lack of political will on the part of the government. However, changes in the political environment coinciding with the availability of some prior year funds have enabled the Mission to propose an anti-corruption intervention for 2006. Although details of the activities are still incomplete, it seems likely that the Ghana program would focus on asset declarations among some categories of public officials, conflict of interest regulations, and greater civil society involvement in efforts to increase accountability and transparency in the area of public procurement. This "package" of interventions may prove to be a vehicle for testing the government's political will. To an extent, the Ghana "case" is indicative of a situation that may affect other non-ACI recipient missions in Sub-Saharan Africa with little or no funding for DG programming. However, as one non-ACI recipient Mission, Mali, has demonstrated, such resource limitations are not absolute impediments to the development of anti-corruption interventions.

Based on information compiled by the Africa Bureau Information Center, nine non-ACI countries in Sub-Saharan Africa already have anti-corruption interventions or will initiate them in 2006. In general, this programming does not differ significantly from that carried out in the ACI-recipient countries. A focus upon civil society's role vis-à-vis transparency and accountability is clearly evident. However, there are some interesting possibilities for linkages between ACI recipient and non-recipient countries in the areas of extractive industries (Sierra Leone) and transport (Democratic Republic of Congo), which appear to be emerging areas for attention in regard to anti-corruption programming.

9. ACI and the MCC Threshold countries

The team saw little systematic evidence of active linkages between ACI and the MCA process in the countries visited. Anecdotal evidence suggests that institutional differences may be a factor in this situation. For example, in Madagascar, which has a Compact with the MCC that is oriented toward agricultural development, local MCC staff had little awareness of the USAID Mission's general DG or anti-corruption interventions. There are, nonetheless, potential areas for collaboration between ACI and MCC in Madagascar, since disputes over land rights are common in rural areas of the country and could become a significant issue area for the MCC program. Citizen complaints of abuse with respect to land matters are within the mandate of Madagascar's anti-corruption organization, BIANCO, which was created in 2004 and receives support from ACI; indeed, the bulk of Madagascar's ACI programming includes elements to engage the rural population in combating corruption. Madagascar's generally weak court system could also become a factor because it could be presented with matters brought by BIANCO

for adjudication. However, forging the necessary linkages between ACI and MCC would require considerable effort on the part of both institutions and, with ACI scheduled to end in 2007, it may not be realistic to expect this kind of mutual effort.

Linkage opportunities may be more promising in the case of countries participating in the MCC's Threshold Program that need to strengthen their anti-corruption efforts before they can qualify for MCC Compact status. Among the ACI countries involved are Zambia, Kenya, and Tanzania. It should also be noted that USAID/EA has provided assistance to the Mission in Uganda for its Threshold Country Program development, although Uganda is not an ACI recipient.

Tanzania may be the most immediate opportunity, since the local Mission and the Africa Bureau actively assisted the government in preparing its program to address areas of weakness in its MCA application, consisting of the following four components:

- build the nongovernmental sector monitoring capacity;
- strengthen the rule of law for good governance;
- establish a financial intelligence unit; and
- curb corruption in public procurement.

Current Mission ACI programming directly addresses subject matter in the first two bullets, while the second pair of bullets are logical extensions of ongoing interventions. The donor community is also actively engaged on rule of law matters through the Legal Sector Working Group (LSWG), so the possibilities for leveraging appear to be solid.

It will be important for the Africa Bureau to carefully monitor the Threshold Country activities that will be getting underway during 2006 in Malawi, Tanzania and Uganda for what those efforts might produce in terms of guidance for any future ACI allocations as well as insights for developing linkages with the MCC programs. Generally, however, there is scant evidence of the hoped for active collaboration between the MCC and USAID in the field. In practical terms this means that some of the questions about institutional relationships and impacts on programming, especially in regard to general anti-corruption efforts that might be carried out by USAID, remain unanswered for the moment.

10.   Monitoring and Evaluation

At this mid-point in USAID's experience with the ACI, most missions have developed relevant quantitative and qualitative indicators for measuring performance with respect to institutional strengthening, capacity building, and improved effectiveness of their civil society partners. The global ACI target for 2007 is that ten of the 12 missions will be achieving impact level results.

Assessment of the missions' overall performance against their baselines (using information from the *Second Annual Report*) indicates that progress is being made. However, as was noted earlier, a degree of caution may be warranted because several recipient missions were forced to make adjustments in their original programming choices in response to changes in their operating environments or administrative issues affecting implementation schedules. Nevertheless, the performance targets (and their associated indicators) that have been selected are relatively modest and appear to be achievable within the means and the time available. As with the design of ACI interventions, the general guidelines that were followed in

devising indicators gave missions considerable latitude. One could question whether a slightly more directive input on the matter from the Africa Bureau might not have produced more challenging targets with a more specific anti-corruption content. For example, there is general acceptance of the view that reducing the enabling environment for corruption is a meaningful objective for an anti-corruption program, but the operational definition of this objective and its linkage to measurable indicators are not entirely clear in the programming that has been carried out by the recipient missions and offices.

In this context, it was instructive to learn that external assistance to the recipients for monitoring and evaluation was most heavily used during the start-up phase of the activities funded by the Initiative. Management Systems International (MSI), the contractor for this technical assistance component, reported that its services were most frequently requested during 2004. In subsequent years, despite general announcements concerning the availability of such assistance, there was a sharp reduction in demand. As noted earlier, Bureau staff provided some of the specialized assistance that was required during this period. The missions have frequently drawn upon AFR/SD/CPG technical assistance resources, which they characterize as appropriate and timely[21]. Still, it should be kept in mind that this assistance also covered general anti-corruption issues and Threshold Country programming. As a general matter, most ACI recipients reported that they did not use the M&E services available through MSI, simply because they did not perceive a need to do so. In some respects this response is similar to that given regarding the infrequent use of support services from the regional offices.

A possible explanation of why the missions made limited use of MSI resources after the initial year may lie in the structure of the Initiative itself. In general, ACI-supported activities are included under existing Intermediate Results and Strategic Objectives. While the indicators are working practically in providing data that can be aggregated to demonstrate overall progress of the Initiative, identifying specific ACI impact remains a significant challenge for existing monitoring and evaluation systems at the mission level. Although ACI undoubtedly plays a role in achieving the goals of the main activity, in those instances where an anti-corruption element is incorporated within an ongoing intervention, results are more likely to reflect the trajectory of major funding streams and program orientations, unless careful attention is paid to identifying specific anti-corruption indicators.

While perception measures such as Transparency International's Corruption Perceptions Index and the Afrobarometer are useful tools for political analysis and planning, they are less useful for monitoring the performance and results of ACI (and probably broader corruption) programmatic activities. One reason is that the kind of impact needed to change perceptions at the national level is difficult to directly attribute to a given program intervention, even at the level of plausible association. Another reason is that perceptions, while useful as a means to gauge public awareness or recognition of corruption in a country, can also be influenced in unanticipated ways by what might otherwise be considered as anti-corruption success stories. For example, extensive media coverage of alleged corrupt practices, or a successful prosecution of a high official in a corruption case, can make respondents more aware of a corruption problem in a particular country, to the extent that the country's TI score could drop rather than improve as a result of the intervention.

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[21] Specifically, the Bureau's Anti-Corruption and DG advisors have been called on to provide for programming and monitoring and evaluation assistance by Missions in Kenya, Ghana, Zambia and Tanzania.

An encouraging sign is that several missions intend to use household surveys and other structured instruments to enhance their monitoring and evaluation plans. However, because most of these efforts are relatively recent, the team found little concrete evidence of how these surveys would be used.

It is also important to recognize that achieving measurable results is not solely in the hands of a given mission. Results also depend upon a host government's ability to satisfactorily carry out its roles and obligations in a given activity. In such cases USAID, and especially its implementing partners, have to be alert to the host government's capacity to take the necessary actions that will lead to the desired results. An unreasonable number of indicators, or those that are politically or financially too costly, are likely to produce frustration in the host and risk jeopardizing future collaboration on important policy matters

It is noteworthy that USAID/Kenya plans to use a set of common anti-corruption indicators that are being developed by the development partners of GJLOS with assistance from Transparency International, a USAID/Kenya grantee. This approach merits attention, because it offers the prospect of reducing the monitoring and evaluation burden of the host government by requiring it to meet one unified set of performance standards acceptable to all of its assistance partners. Should this consensus-based approach to developing performance indicators prove to be effective in Kenya, it may be reasonable to consider how it might be adapted to other country settings, especially those where donor coordination structures such as GJLOS are not present.

Finally, of course, managers in the field must be willing to assign a portion of their scarce ACI resources to evaluation, as was the case with USAID/Tanzania's proposal, which included evaluation support for the expected five-year LOP.

III.   CONCLUSIONS AND RECOMMENDATIONS

A.   OVERVIEW

The Anti-Corruption Initiative has helped to place the need for effective interventions to combat corruption in a more prominent position among USAID missions' programming priorities. It has enabled the recipient missions to generate a variety of approaches that have, in turn, led to a richer, experience-based understanding of the nature of the challenges that give rise to abuses of the public trust. Although there have been few formal efforts to exchange information outside the network of recipient missions, the impact of the Initiative can be inferred from the number of non-recipient missions that have plans to add anti-corruption programming in the near future.

Specifically, the Bureau's Anti-Corruption Initiative has contributed to showing that:

- anti-corruption interventions can be integral components of core-funded programming and can be implemented with reasonable expectations of achieving impacts and results; and
- addressing patterns and practices of violations of the public trust is within the manageable interests of Sub-Saharan Africa missions.

From the combined experience of the missions that are receiving ACI support several lessons have emerged:

- Civil society organizations continue to be valuable tools and, with carefully crafted assistance directed to building analytical capacity and subject matter knowledge, can play a more substantive role in effective implementation of anti-corruption activities;
- Promoting collaboration between civil society groups and legislative bodies is a constructive means of building the capacities of both types of organizations to institutionalize a shared commitment to transparency and accountability;
- Anti-corruption interventions can be effectively integrated into larger core-funded activities, e.g., health or education;
- Experience to date suggests that line ministry departments, audit authorities and regulatory agencies provide important windows of opportunity in combating corruption.

As a general matter, the ACI has given its recipients a practicable mechanism for programming activities to combat corruption. In some instances, the evaluators were told that without this support a mission would have been unable to implement the interventions. Quite simply, for these missions, the Initiative provided the means for doing something they had wanted to do, but for which there were no funds available. The evaluation team was told by other missions that the ACI had "triggered" their consideration of anti-corruption programming. In each of these sets of circumstances, the Initiative gave the missions specific objectives and some important criteria to use in assessing their capacities *vis-à-vis* the local political environment.

The evaluators found some indications that valuable time was lost in making progress toward objectives because a significant number of the participating missions were forced to adapt their programming to unexpected disruptions in their respective political environments. As noted elsewhere in this evaluation, the necessary adjustments were made and the Bureau played an important supportive role in this regard.

Although these disruptions meant that implementation timelines and, in some instances, intervention targets had to be modified, they do not appear to have prevented the affected missions from achieving some degree of progress toward agreed upon indicators. We believe that under a continuation of the ACI, it would be of value to revisit and reassess some of those original intervention targets, as they may still be worth pursuing.

B.   THE FUTURE OF THE ACI

The ACI, as with any such time-limited device, was not intended to be a permanent means of addressing the issue of corruption in all of Sub-Saharan Africa. Rather, its principal purposes were to enable the Africa Bureau to raise awareness of the importance of anti-corruption programming among the USAID missions in the region, and to engage a select group of missions to demonstrate the feasibility of such programming by means of a variety of locally developed approaches. In the main, the ACI is meeting its goals. Nevertheless, it is appropriate and timely to consider what the next steps might be in addressing the ongoing issue of corruption in the affected countries.

A number of bilateral missions are now developing plans to specifically deal with the corruption issue, even without the benefit of ACI support. This is, perhaps, the clearest indication of the Bureau's success in "consciousness-raising". In addition, it suggests that these missions have been paying attention to the activities being carried out by their colleagues under the aegis of the Initiative. Moreover, the fact that other missions will be carrying out their interventions without this earmark implies that the lack of specially designated funding is not an absolute barrier to devising anti-corruption programs. On the other hand, the proposed activities do appear to reflect an appreciation of the ACI programming parameters that were put forth in its eligibility criteria. And, of course, missions new to anti-corruption programming can draw upon the extensive variety of interventions that USAID missions have implemented, in Africa and elsewhere, over the years. Still, this combination of field experience does not mean that there is nothing more to be learned about how to effectively address corruption.

For example, the USAID/EA experience with a full-time specialist for anti-corruption matters was, on the whole, a positive one in that the specialist provided effective assistance to several missions as well as management attention to USAID/EA's principal anti-corruption intervention. However, none of the other ACI recipients employed such a specialist, making generalizations difficult. In this regard, the technical assistance provided by Washington-based staff, although judged to be appropriate and useful to the missions, may also have led those missions to forego adding specialized staff support. Broader experience with a full-time anti-corruption specialist might provide insight on the added value of such a resource to programming, especially for smaller missions and the particular needs in non-presence countries.

Our general view on the future of the Initiative, however, can be inferred from the nature of the recommendations presented below. We believe that the ACI should continue beyond 2007, and that the Africa Bureau should consider making all Sub-Saharan African missions eligible to compete for funding. We would endorse the continuation of the current annual funding ranges, with some flexibility so as to accommodate exceptional cases. However, the Bureau should direct some of the funding to testing the efficacy of programming configurations that combine civil society organizations, national and local legislative bodies and specialized ministry departments and audit agencies in activities that aim to institutionalize a culture of transparency and accountability. To reduce the built-in bias toward recipients under the original ACI, at least one-third of recipients under this "incubator" model should be new

missions. While regional offices should be required to compete for program funding, each office should also be allocated funds to support a regional anti-corruption specialist since the value of this technical resource does not reside in the presence or absence of specific anti-corruption elements in regional office programming.

The specific experience that missions have gained through the use of ACI funding suggests some modalities for programming that give greater attention to fostering collaborative relations between civil society organizations and legislative bodies at local and national levels. Specifically, the recipient missions' anti-corruption interventions are giving rise to a model that emphasizes the acquisition of technical skills and knowledge among CSOs that can enhance their demand-side roles and lead to less adversarial relations with legislative bodies. In so doing, missions may discover that this knowledge-driven approach can be of particular value in sharpening the focus of their responses to supply-side concerns that involve legislative organizations. A well-crafted articulation of a public interest can also be viewed as a tool for building the capacity of legislatures at the same time that citizens are acquiring a sense of involvement and participation in the processes of governance.

With regard to the use of strictly supply-side interventions as anti-corruption instruments, the record so far does not provide a clear programming path. One possible explanation may be found in the tendency of missions to make programming choices that rely upon judgments concerning the life expectancy of political will in complex and dynamic political environments. In this respect, it might be a better use of scarce resources for legislative capacity building. From such a vantage point, USAID, in collaboration with other donors, e.g., DFID, the World Bank, and others, may then be better prepared to assess the risks of supply-side interventions in the executive branch of host country governments that depend on political will.

Following are some of the arguments for and against continuation of the Anti-Corruption Initiative that the Africa Bureau should consider in its decision-making.

Pro:

- Continuation would demonstrate the Bureau's long-term commitment to combating corruption in Sub-Saharan Africa.
- Additional gains in knowledge from expansion of number and types of missions that could participate.
- The Initiative can provide resources for testing best practices in anti-corruption programming.
- The ACI programming framework allows substantial flexibility, but SO and IR parameters are clear.
- ACI is a strategically valuable focal point for policy dialogue with host countries.
- Continuation would underscore the value of ACI as a vehicle for enhancing collaboration with MCA.
- The Initiative provides a strategic programmatic link to other important USAID policy interests, e.g., The Fragile States Strategy, by virtue of the kinds of anti-corruption interventions it has directly supported and indirectly encouraged through coordination with other donor partners.

Con:

- Missions regard ACI funds as "special," not additive to core programs, when budget allocations are being made, which limits the possibilities (and potential benefits) of mainstreaming ACI resources.
- Missions tend to regard ACI funding as a replacement for reductions (actual and anticipated) in Democracy and Governance funding.
- Missions do not like earmarks, even when they are of the "soft" variety.
- It is difficult to measure impact of ACI interventions because of inherent problems of attribution, especially when they are subsumed under existing SO and IR regimes. Developing anti-corruption-specific performance indicators will continue to lag without focused effort and additional resources.
- The relatively small financial envelope relative to the nature and scope of the problems associated with corrupt practices undercuts the view that the ACI reflects a long-term commitment. It also presents a barrier to entry by a larger number of missions and thus to more diversity of political environments.
- The Initiative lacks a systematic means for effective knowledge management of results achieved by anti-corruption programs and interventions for Sub-Saharan Africa.

C. SPECIFIC RECOMMENDATIONS

Recommendation 1. The ACI should be recast to give more direct attention to specific anti-corruption targets and reduce some of the current latitude for programming accordingly. In some cases, Nigeria for example, it appears that ACI funding was being used for generic CSO capacity building with limited potential to work directly in the anti-corruption field. Somewhat paradoxically, Nigeria was the first visited site where the lack of technical skill and knowledge was identified by a government partner as an important resource gap among the CSO implementing partners. In particular, ACI recipients working with CSOs should:

- Increase the subject matter knowledge (budget, extractive industries, donor funding and activities) among civil society groups that will be working on anti-corruption issues. Nigeria's Project ADVANCE, for example, plans to work with ActionAid-Nigeria in areas where it lacks requisite technical capacity. Other possibilities might include collaboration with local universities or securing specialized services from the local consulting community.
- Give more attention to the need for lobbying and advocacy skills for CSOs that deal directly with elected officials and senior level executives and agency heads. This could help to more clearly identify specific anti-corruption outcomes.
- Explore the potential of the Tanzania Governance Noticeboard (TGN) as a model for collecting and disseminating data (and training in its use) for CSOs working on transparency and accountability issues. Admittedly, the TGN is in an early stage of implementation and the website is not completely user-friendly. Nonetheless, the Policy Forum coalition believes it to be an important tool for enhancing citizen access to information concerning the use of public funds, including donor supported activities. Moreover, that the analysis of government data carried out by the TGN team helped the Auditor General improve the accuracy of its own data is an unanticipated benefit that may augur well for ongoing collaboration with government departments in this area. In the parlance of the Information and Communications Technology

community, the current state of the Noticeboard may be regarded as in its beta phase. In that context we believe testing (exploring) customer usability, costs, especially those related to sustainability, and how the TGN data are put to use are appropriate areas to monitor.

- Encourage the broader use of participatory planning techniques to identify anti-corruption targets for CSOs. This is generally done at the local level, but opportunities for using such techniques also exist at national and regional levels. Ensure that targets are relevant to civil society concerns and are appropriate to the skill, resource and knowledge levels of the organizations and groups involved in the activity.

Recommendation 2. Supply–side interventions aimed at strengthening legislative roles and functions and decentralization schemes are showing signs of impact in terms of empowering these government entities to act more effectively as counterweights to the executive branch. Investments in activities that strengthen the institutional role and technical oversight capacities of the national legislative branch and local governing bodies with respect to public accounts also have significant potential for reducing the environment for corruption within the lifetime of the ACI. To help ensure such impact, these kinds of activities may need to be adjusted to more directly address issues of accountability and transparency in the legislature's relationships with the executive branch, e.g., identifying specific policy-level commitments by the executive branch to the independence of an anti-corruption function. In the same vein, measures of the extent to which legislation with anti-corruption components, e.g., those that address freedom of information, asset disclosure of public officials, and mechanisms for asset recovery, are not only passed but implemented could be useful indicators.

Recommendation 3. Missions should expand the factors considered in their due diligence with regard to programming decisions that are based upon perceived political will or a window of opportunity emerging from specific government actions, e.g., the appointment of a corruption czar, creation of a national commission responsible for investigating corrupt practices, or passage of anti-corruption legislation. Such due diligence would examine the political sustainability of these actions, giving explicit consideration to such factors as:

- de facto dominance of political space by one party;
- character of party discipline in the legislature;
- localizing the extent of grand corruption by institution or economic sector;
- perceptions of state capture and other evidence of influence peddling;
- rules governing political party formation; and
- strengths and weaknesses of the justice and legal systems.

The above are indicative factors that could be taken into account in ascertaining the receptivity of a given environment for anti-corruption interventions as part of a systematic anti-corruption assessment.[22] However, when the decision process requires judgments based on perceptions of political will in the executive apparatus, this short list may also be used to elicit information without incurring unacceptable time penalties, and is well within the means of an individual mission and would not necessarily require the involvement of external consultants. Again, we do not in any way suggest that due diligence is not already being carried out, but rather that careful attention to the political sustainability of conditions

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[22] See the discussion of such an assessment in the MSI study entitled, A Rapid Anti-Corruption Technique for USAID/Africa, Washington, DC: February 2005.

arising from windows of opportunity and political will could be helpful in better identifying and screening targets of intervention.

Recommendation 4. There seems to be an efficient flow of communications between the ACI recipients and the Africa Bureau. However, this should be matched by a mechanism that encourages exchanges on programmatic issues among the recipients. While such communications do take place, the evidence suggests that they are *ad hoc*, thus infrequent. The communications mechanism need not be elaborate or costly, and might consist of a teleconference organized from the Africa Bureau because of time zone differences. In terms of frequency, the conferences could be scheduled to take place shortly after the ACI-recipient missions submit their semi-annual reports.

More generally, the Bureau may want to explore the feasibility of creating a website to promote the sharing of information about anti-corruption programming issues and choices being made in the field. Most of the recipient missions have already acquired some experience in website development, e.g., USAID/WA, Tanzania and Kenya. It should be possible to draw from that collective experience to design and implement a site, and perhaps to leverage funds from The Leland Initiative or establish a public-private partnership to make the site available to all Sub-Saharan missions and, ultimately, to other partners and stakeholders.

The Bureau may also wish to consider the idea of creating an internal (regional) anti-corruption working group that would meet periodically to review developments in the respective regions and disseminate information from experience, research and evaluation to missions engaged in Initiative-supported activities as well as those who are planning to include an anti-corruption component in their programming. A summary of such meetings would be a good candidate for publication on the website discussed immediately above. In addition, the notion of forming a donor consultative group on corruption that was discussed in the final Initiative paper might merit further examination.

Recommendation 5. In view of the pipeline management issues that are part of the recipients' experience to date, the Bureau may wish to explore the feasibility of introducing some budgetary flexibility in the operating procedures for the Initiative during the first two years of ACI funding. For example, rather than reducing an allocation by the amounts remaining in the pipeline, the Bureau could straight-line the allocation (based on the initial approved budget) for the second year. The objective of this one-time exemption would be to give missions an enhanced degree of resource flexibility to adjust their programming in response to significant changes in their implementing environments that affect the character of the anti-corruption intervention.

APPENDIX 1: MISSION PROGRAM PROFILES

A.   SOUTH AFRICA

The concept and design of the USAID/South Africa ACI intervention was well conceived to provide anti-corruption support for the criminal justice system, the local government system, and the structures of civil society. Management at the mission level impressed the evaluation team with its knowledge of the ACI program components, the commitment of the staff, and particularly with its preparedness for the ACI evaluation site visit. The lapse in mission management with regard to one implementing partner is acknowledged, lessons have been learned, and there is reason for strong confidence in excellent future management of any ACI funding.

The implementation of the mission's ACI program has seen notable results and also presents unique possible impacts, in spite of a major implementation problem with one parting partner. The results of the mission's criminal justice support to the Specialized Commercial Crimes Court, through its partnership with Business Against Crime (BAC), indeed offers a possible best practice model for ACI or USAID globally. USAID assistance was critical, the program was quick in start-up, and provides measurable results with genuine impact. While implementation of the mission's local government element of its ACI strategy has suffered a serious setback due to poor program execution, the intervention is strategically important, and the Mission is taking appropriate steps to stabilize the intervention with a new implementing partner. The program should yield measurable and important anti-corruption results within the time frame established for the Initiative. Local government increases its importance exponentially in the country with each passing year and is the locus for crucial service delivery to citizens. A successful USAID/ACI intervention in this area, through a critical partner like the Department of Provincial and Local Government, is a very worthwhile component of ACI funding.

With regard to support of civil society in its anti-corruption strategy, the mission is pursuing a very useful engagement in support of investigative journalism that can be beneficial for other ACI recipients as well. Its support of civil society organizations for monitoring and advocacy has not yet reached its potential, though the potential is there. The mission intervention in this area of support must be very well calibrated with political realities to be effective, but there is clearly competence and determination at the mission to make effective future choices should funding be accessible. The mission has also committed ACI funding for work with the Association of Public Accounts Committees. This one-time expenditure for training, or equally considered legislative strengthening, for members of national and provincial public accounts committees can be described as a good value-for-money ACI intervention. Recipients also regard the activity as an important intervention and were very appreciative of the USAID support.

The South African case presents one of the scenarios where a continuing ACI and future funding could provide ACI with the results of the long-term vision with which it embarked. At present, South Africa demonstrates a relatively durable commitment of political will and an "open" window of opportunity, where ACI support funding can be effectively put to use. In a political atmosphere lacking the broad rhetorical support for anti-corruption present in other countries, the government appears to be capable and willing to manage programs effectively where it has made a commitment.

B. KENYA

The USAID/Kenya anti-corruption program was very significantly designed at the inception of the ACI to support the Department of Governance and Ethics (DGE) and its dynamic Permanent Secretary, John Githongo. Githongo assumed the position shortly after the December 2002 election of current President Mwai Kibaki. USAID funding of DGE supported the strategic plan of DGE and included support for operations, staff capacity building, system designs, surveys, and outreach and communications programs. This core program was, however, abruptly terminated upon Mr. Githongo's resignation and departure from the country in 2005. Senior staff working with USAID also departed and the DGE effectively became a moribund agency.

This required mission management to resort to program modifications and a reprogramming of funds. Other challenges to programming included the termination by government of an active Director of Public Prosecutions and the contentious departure of the Executive Director of Transparency International-Kenya, both USAID partner institutions.

With a reorganization of TI-Kenya, the mission is again supporting this major civil society stakeholder along with other civil society organizations like the Center for Governance and Development. Major reprogramming of the projected funding for DGE was directed toward support of an existing USAID supported State University of New York (SUNY) program with the National Assembly. This program has sought to more effectively oversee the executive and advance the reform process, while helping incorporate civil society and private sector views. Cooperation is intended to occur with the Public Accounts Committee, Public Investments Committee, and the Finance Committee.

With the recent government loss in the November 2005 referendum to reallocate executive authority, to create a Prime Minister position, and to delineate a new structure for decentralization, the heavily charged and volatile political atmosphere in the area of corruption, and the projected elections next year, the future for government programming in anti-corruption is very difficult to calculate. The Mission also uses non-ACI funding to support the Governance, Justice, Law and Order Sector (GJLOS) Reform Programme. This is the principal international donor intervention in the area of democracy and governance. The Reform Programme oversees the expenditures and activities of a broad range of government departments, assessing their performance by means of a set of evaluation criteria developed by members of the GJLOS, including USAID/Kenya.

C. TANZANIA

The concept and design of the USAID/Tanzania ACI intervention is very focused on successes that can be achieved through the Tanzania Governance Noticeboard (TGN). TGN is a collaboration by Washington DC based PADCO, operating on the Anti-Corruption IQC, and Research on Poverty Alleviation (REPOA), a local Tanzanian NGO. The essential goal is to increase public accountability through the provision of information on public budget and expenditure, with a focus on the district level. This would seem to be a sensible orientation in view of the low placement of corruption among major concerns of the public according to data from the 2005 Afrobarometer Survey in Tanzania.

The TGN, launched in September 2004, opens up two means of access for public expenditure information for demand side use, through the mechanisms of a website and a Public Expenditure Tracking System

(PETS) to be made operational at district level. The website provides government financial information from government reports in virtual format, while the district level implementation of PETS would seek to provide information to citizens and community groups on physical noticeboards to facilitate public access to this information. The TGN may also play an important role in the implementation of Tanzania's Threshold Country Program. Of particular interest will be the likely contribution of the TGN to enhancing the monitoring capacity of civil society for accountability and transparency concerns.

While the TGN website and PETS show significant potential as effective vehicles for citizen engagement and oversight of government —and tools for government—their "user friendliness" is a source of concern. The lack of training and hardware for full utilization among both government and civil society actors needs to be remedied if the activity is to realize its potential.

In this regard, the training programs that have been provided through REPOA appear to be appropriate, but we would encourage closer consultation with a group such as Hakielimu in developing future training activities. We also believe that REPOA/TGN might profit from being a bit more aggressive in reaching out to the Policy Forum and other civil society groups. We believe the same course would be appropriate with regard to forging closer linkages with the Local Government Reform Program.

TGN must construct a very organized and concentrated campaign of engagement and training for civil society and government to increase the awareness and use of this system. It is a program that has the support of the donor community and requires additional staff and technical assistance to achieve its dramatic inherent potential. With possible MCA funding, the funding, expertise, and support structure of PADCO through the IQC, possible use of selected external technical assistance, and possibly increased and targeted ACI funding, the TGN could be a very useful model for USAID as well as for future best practice application

The team believes that this intervention, if strategically and meticulously developed, presents the possibility for a very effective anti-corruption program by USAID with many possible synergies. Collaboration with current USAID partner SUNY on parliamentary strengthening and future work promoting investigative journalism could both blend well to maximize TGN benefits.

D. MADAGASCAR

The concept and design of the USAID Madagascar mission ACI intervention is three-fold; seeking results in assisting government response to corruption, engaging civil society in anti-corruption, and increasing public awareness about anti-corruption.

Some of management matters related to anti-corruption programming were in flux at the time of the evaluation team's visit given the departure, immediately prior to the site visit, of the Democracy & Governance officer and the recent arrival of a new Mission Director. At the conclusion of its visit, the team believed that the potential for successful interventions was strong. This was due to the evident will of the new Mission Director, assisted by capable relevant office staff, to be effective and effectively utilize funding for anti-corruption interventions.

During the site visit the team met with a broad range of international stakeholders, including representatives from several embassies and the US Ambassador. It was the team's view at the conclusion,

that a refocusing of the mission's anti-corruption intervention could well suit the situation. Specifically, with a focus less on supporting surveys and institutions that address framework matters, the mission could look at future interventions that were more directed to specific support of government. The Mission provides major support for the Conseil Supérieur de la Lutte Contre la Corruption (CSLCC)[23], an agency located within the Presidency that supports the development and implementation of a national anti-corruption strategy, and for the Bureau Indépendant Anti-Corruption (BIANCO). Each of these, while operational, have not yet gained sufficient experience to demonstrate substantive programmatic impacts. Media coverage of the two bodies seems relatively frequent and positive, especially for BIANCO. This organization, with Mission support, is making strides in its efforts to increase public access to its complaints process by opening satellite office in major population centers outside the capital region. USAID and its donor partners may want to consider a slightly more aggressive role in assisting these entities more effective as actors in anti-corruption. The CSLCC must begin to move from a focus on strategy formulation to one that addresses monitoring and evaluation of the government's anti-corruption activities and the implementation of its existing strategies. BIANCO may require prosecutorial powers if it is to influence enforcement of the anti-corruption laws and strategy. However, given the bureaucratic infrastructure and continuing political will on the part of the executive branch, the potential exists for Mission support to further enhance capacity and lead to a more perceptible anti-corruption impact in the country. A possible starting point would be to identify ways in which better integration of responsibilities and activities of the Office of Good Governance in the Presidency and those of CSLCC and BIANCO might lead to greater effectiveness of anti-corruption efforts. This notion is a product of the team's discussion with the new management team at USAID/Madagascar but does not reflect any specific commitments on the part of that Mission.

The site visit to Madagascar also raised certain questions about the utility of surveys as an effective anti-corruption tool rather than as a means for measuring the climate and impact of interventions. There has been a propensity by USAID to consider such surveys as interventions in and of themselves. Of particular concern was the seeming lack of interest in the survey findings among members of the national legislature.

Current activities, while appearing to achieve results with impact, are not well honed. The evaluation team was not convinced that the anti-corruption program implementing partner MISONGA, a partnership between PACT and Catholic Relief Services, was the best vehicle through which to execute the USAID anti-corruption strategy or to assist local partners, in spite of the fact that there appeared to be no overt criticism. The team did not perceive that MISONGA, in its role as intermediary, provided a discernible benefit to the mission.

The political climate in the country is still one that lends itself to positive analysis of a "window of opportunity." The mission appears determined to find the best possible use of funding for anti-corruption programming and with continuing review it is certain to find the approaches for offering supportive technical assistance to partners that can make a difference.

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[23] As of March 2005 it has been renamed as Comité Pour la Sauvegarde de l'Intégrité (CSI).

E.   BÉNIN

USAID/Bénin mission is concentrating its anti-corruption efforts in three principal areas that include supply-side and demand-side elements:

- reinforcing Supreme Audit Institutions' capacities and improving competition and transparency in public procurement;
- strengthening civil society's role in anti-corruption and;
- increasing local governments transparency, accountability and public outreach and promoting civil society organizations participation in decision-making for local development.

By using a single implementing partner, Bénin was merely rationalizing the process it had previously followed in making a relatively large number of small direct grants. There were some implementation delays due to problems in preparing the task order, which were exacerbated by subsequent changes in the implementing partner's local management. This combination led to lags in obligating funds through the sub-grant mechanism which produced some criticisms among civil society groups whose operations and contributions to the anti-corruption effort were also slowed. However, these initial problems have been corrected and progress is being made with overall implementation.

USAID supported the two Supreme Audit Institutions of the Government of Benin: the Inspector General of Finance and the Chamber of Accounts. These two organizations are likely to be joined by a third during the current year as discussions for support to the National Procurement Verification Board were recently successfully concluded.

Civil society organizations are numerous in Bénin, with an officially registered total of more than 2000. There have been reports of increased harassment by government, but this may have been an artifact of the run-up to recent presidential elections. Nevertheless, two organizations have been identified as principals for the anti-corruption programming of the Mission based upon their prior experience with USAID and the broad respect that they command for their effectiveness and integrity.

For example, one of these groups, in cooperation with local television, organized an extensive discussion of alleged corruption in public procurement in two government ministries. As we noted above, the organizations are recipients of USAID financial support, but a significant proportion of their work is self-financed. At the local level, civil society, private business people and local government are collaborating in the management of micro-projects. The other group, Association de Lutte Contre le Racisme, l'Ethnocentrisme et le Régionalisme (ALCRER), has organized a series of mobile presentations on corruption and anti-corruption activities for primary and middle-schools throughout the country.

USAID/Bénin is also working to update its indicators to reflect the activities carried out under the anti-corruption rubric. It has recently completed an assessment to identify more appropriate quantitative indicators for the activities of its supply-side institutions, i.e., Inspection Générale des Finances and the Chambre des Comptes and, prospectively, the Commission Nationale de Régulation des Marchés Publics.

While we indicate in the body of this report that Bénin intends to mainstream some of its anti-corruption programming, principally those elements implemented by local NGOs, into its health and education

portfolios, there was no suggestion that it was also considering a disengagement from its efforts involving the judiciary and the administration.

F.   USAID- WEST AFRICA

The West Africa anti-corruption intervention emphasizes integration into its sectoral programs that address issues of corruption on a cross-national basis. As such, it tends to focus its focus its coordination efforts in areas that engage multilateral donor organizations, e.g., The World Bank, as opposed to bilateral entities with a single country orientation.

Thus, USAID/WA is using part of its ACI funding to support broader information technology usage in post-conflict environments as a means of building greater capacity to address corruption issues among civil society organizations that are also engaged in humanitarian efforts. This has included preparation of facilities, network and website development for rapid exchange of data and information and equipment purchasing and training.

Another activity will involve broadening an ongoing intervention to address potential and actual corrupt practices in anti-retroviral services, procurement and delivery. In this context, USAID/WA is examining the possibilities for linkages between some of the components in this health effort with its work on creating a regional transportation hub.

The potential link is in the use of long distance trucking for the transport of health and medical supplies throughout the region. In addition, there is the associated factor of HIV-AIDS along the trucking routes that adds to the health dimension of USAID/WA programming. Because of the cross-border issues involved with transport in the sub-region, reducing the scope of an enabling environment for corruption is an obvious target.

USAID/WA is seeking to employ a specialist to deal with anti-corruption for its 19 country region.[They were supposed to have hired someone as part of being a regional ACI recipie nt mission (USAID-Southern Africa was the exception, because the bilateral in Southern Africa didn't feel they needed assistance) but, well into the third year of the initiative, have yet to do so.] This position would be comparable to that already in place at USAID/EA. It offers significant potential for more efficient programming and technical assistance especially in helping to assure greater coherence among the interventions described above. In this same connection, a problem of donor coordination reported by one of USAID/WA's implementing partners would be an area where such a position could be of value to program implementation and monitoring.

G.   USAID- EAST AFRICA

The USAID- East Africa anti-corruption effort is an element of the Northern Corridor Project, a regional activity that works with private sector transport and freight-forwarding companies, ministries and regional bodies, e.g., COMESA to promote efficiency, transparency and accountability in the interstate movement of goods.

This activity capitalizes on the adoption of computer-based tracking system that has been adopted by the Kenya Revenue Authority (KRA). USAID/EA has embraced this software and recently launched a major

training center in its use in the port city of Mombasa, the principal entry point for goods destined for the East Africa region. Complementing this information-technology based component, the activity also seeks to develop a modern training program that addresses logistics, business management and ethical conduct for members of the principal freight forwarding organizations and revenue authorities throughout the region. In concert with these elements, an effort is also being made to increase the professionalism among the members of the freight forwarding community.

This component also intends to devote greater attention to enhancing the capacity and role of private sector operators in their dealings with government on policies, rules and regulations affecting the interstate movement of goods and the operations of the several government ministries and organizations that are involved with their industry.

USAID/EA is also actively engaged in anti-corruption programming with USAID missions in the region. Part of the funds received through the ACI have been used to employ a specialist, who acts as the CTO for Northern Corridor-related activities and provides the regional office-based technical support that was envisioned by the Africa Bureau when the ACI was launched.

As this effort evolves, there may be good reason to give closer attention to its focus on port operations at Mombasa, as the primary point of origin for the movement of goods throughout the region. The Tanzanian members of the coalition of freight forwarders are making an argument for equal attention to the Port of Dar es Salaam as focal point for a second "corridor" that would serve the southern part of the Great Lakes and other landlocked countries in their vicinity.

H.   NIGERIA

As with Bénin, USAID/Nigeria uses a single implementing partner for its ACI-funded activity. Project ADVANCE employs these funds to strengthen the role of civil society in the Nigerian Extractive Industries Transparency Initiative (NEITI).

The project addresses two issues affecting the ability of civil society to effectively work with this entity of the Nigerian government:

- a requirement for specialized knowledge;
- dissemination of oil revenue data for public policy-making.

USAID/Nigeria began working with the NEITI in 2004 and since that time has assisted a major civil society coalition (the Publish What You Pay Campaign, PWYP) to gain access to the proceedings of the NEITI National Stakeholder Working Group (NSWG) whose members are appointed by the President. Civil society and the NEITI have recently signed a Memorandum of Understanding that formalizes the relationship.

Participation by civil society has been criticized for its inability to fully contribute to the work of the NEITI due to the lack of sufficient technical knowledge of the subjects dealt with by the NEITI. Correcting this acknowledged weakness is a critical part of the task assigned to Project ADVANCE. One of its first implementation efforts was to select five CSO representatives for industry-relevant training. At

the time of the site visit, this training was still in process, and the PWYP representatives had begun their service on the NSWG's civil society steering committee.

As a complement to the training of the PWYP representatives, ACI funding has also been used to build broader civil society capacity in areas such as accounting, revenue reporting, oil industry economics, oil industry structure and management, budget and finance and local product supply chain issues.

With its attention to making a great deal of budgetary information available to the public, the ADVANCE project bears some resemblance to the Tanzania Government Notice Board. However, it is not as broad in its coverage and it does not employ information technology to a comparable extent. These might be considered as additions as this effort evolves, especially as a focus on a stronger civil society will continue to be a component of further anti-corruption efforts. In addition, while it is clear that USAID/Nigeria is also engaged on other fronts in combating corruption, i.e., Economic and Financial Crimes Commission, the strategic policy coherence of these discrete activities was not entirely clear.

APPENDIX 2: SCOPE OF WORK

1. PURPOSE

The purpose of this Order is to conduct a mid-term evaluation of the five-year USAID Africa Bureau Anti-Corruption Initiative (ACI), which began in FY 2003 and will end after FY 2007.

The ACI is a five-year initiative that funds nine bilateral USAID missions and the three USAID regional Africa missions to undertake, through grants and contracts with USAID implementing partners, anti-corruption efforts at the regional, national, and sub-national level across all of the sectors that USAID works in, but primarily in the Democracy and Governance sector. (The ACI is managed in the Office of Sustainable Development by the Communications, Peacebuilding, and Governance Division (AFR/SD/CPG).

2. SCOPE OF WORK

BACKGROUND

The Africa Anti-Corruption Initiative is a five-year program that began in FY2003. Its goal is to reduce corruption in countries that have embraced principles of good governance and demonstrated a commitment to reform. It builds upon USAID's substantial experience in anti-corruption programming. Long before fighting corruption was identified as a legitimate and important goal in and of itself, USAID was a pioneer in designing and supporting programs to strengthen public sector integrity. Since the late 1960s, USAID missions have supported long-term projects to improve public sector management and increase the capacity of government ministries to curtail the misuse of public funds.

Building upon this experience and based on lessons learned around the world, the Anti-Corruption Initiative provides funding to nine countries: Benin, Nigeria, Rwanda, Kenya, Tanzania, Zambia, Mozambique, Madagascar, and South Africa. In addition, funding is provided to USAID's three Regional Missions to support region-wide projects and provide assistance to bilateral missions. Missions were selected for funding based on five-year work plan proposals submitted competitively by missions in response to a solicitation from the Africa Bureau. The proposals were evaluated according to the following criteria:

1) Clearly defined window of opportunity to engage corruption problem, including demonstrations of political will and civil society commitment to tackling corruption;
2) Demonstrated capacity of mission to manage expanded portfolio;
3) Demonstrated capacity of implementing partners to execute the program;
4) Likelihood of success and demonstrable impact in five-year period; and
5) Likelihood of generating innovation (including cross-sectoral approaches) and replicable models.

In FY 2003, $5.15 million of the $7.2 million in initiative funds were allocated to recommended bilateral mission programs and $1.815 million to supported regional activities. AFR/SD/CPG programmed $235,000 for technical assistance to the field, donor coordination, and monitoring and evaluation, which was contracted under the Anti-corruption IQC to Management Systems International, Inc. (MSI). In FY 2004, the ACI was funded at $6.3 million. Of this, $4.3 million was allocated to bilateral missions at essentially straight lined levels from FY 2003. Regional missions received $1.815 million. Finally, Afrobarometer received $185,000 for public opinion

surveys on democracy and governance issues, including corruption, to support the monitoring and evaluation of ACI activities. All FY 2004 and 2003 funds have been programmed.

Most missions have obligated both FY 2003 and 2004 funds and issued requests for additional assistance. Most have also determined their implementing partners and begun activity design and development of monitoring and evaluation plans. While there are notable successes, mission performance in obligating funding, implementing activities, and demonstrating results has varied considerably. A few missions have large pipelines and have yet to expend the bulk of their ACI funds.

Because funds were allocated late in the first year of the initiative and some missions experienced problems with programming, some ACI activities are only just beginning to realize results. However, other missions have already begun to realize significant results or at least have significant outputs. This is particularly, but not exclusively, true of missions that had existing anti-corruption programming prior to receiving ACI funds. (Please see Attachment A for a description of existing ACI country programming.)

It is anticipated that most of the bilateral and regional programs will realize strong results by the end of FY 2007 in a wide range of areas, including legal reform, civil society strengthening, increased government capacity to fight corruption, enhanced capacity of legislatures to monitor the executive, and public awareness and other activities to decrease petty and local level corruption. However, mission program design, strength of implementing partner(s), and country contexts vary widely.

The emergence of the Millennium Challenge Account (MCA), with its focus on corruption in threshold countries in particular, has raised questions about linkage of the ACI to other USG programs and also presents new opportunities. The ACI pre-dates the MCA, but MCA funding greatly surpasses the limited resources available through the Initiative. Not all ACI countries are MCA eligible or MCA threshold countries (and vice versa), but some pilot efforts developed under ACI may be expanded under the MCA threshold programs. The Africa Bureau would like to identify these linkages where they exist.

OBJECTIVES

This mid-term evaluation of the Africa Bureau Anti-Corruption Initiative is intended to
- Assess the effectiveness to-date of the Initiative and of the bilateral and regional programs it supports;
- Compare progress achieved in each Mission against baselines;
- Identify and explain the implementation problems affecting the variable missions' performance in obligating funding, implementing activities, and demonstrating results;
- Determine whether the ACI is on track to achieve its goals through FY 2007. If not, why not?;
- Describe and determine the relevance, usefulness, appropriateness of the technical support provided by AFR/SD/CPG, the regional missions with Anti-Corruption Advisors, and MSI;
- Compare the results of the programs in ACI recipient countries with the results of a non-ACI recipient country;
- Assess the added value of the ACI, for USAID and USAID missions both in terms of accomplishing its objectives and in the broader context of USAID's development assistance in Africa.
- Provide recommendations on course corrections or changes to the existing initiative;

- Provide recommendations on the type of technical assistance needed for the remainder of the ACI, given the differences in implementation success for different missions; and
- Help inform decisions about whether or not to continue the Initiative beyond its 2007 expiration date.

Questions to be answered by the evaluation include:
- To what extent is the ACI fulfilling its original intention, as outlined in the USAID/AFR Anti-Corruption Initiative paper dated 9/13/2004? Is the Initiative still relevant?
- Which would be more beneficial to USAID missions: continuing with a dedicated allocation of resources for corruption activities, or integrating ACI resources into the overall DG budget?
- What is the value that the regional missions add to overall ACI programming and to the ACI as a whole?
- What value-added does the ACI structure bring to USAID's overall anti-corruption programming in Africa? What lessons, if any, are being learned and transferred among Missions and within USAID/Washington on anti-corruption programming?
- What opportunities exist for the ACI that are not currently being taken advantage of or that can be anticipated, particularly as they relate to new developments within the USG (i.e., the President's focus on global democracy promotion and the MCA), USAID (the White Paper, Fragile States Strategy, and Strategy for Africa), and the broader development context?

LEVEL OF EFFORT

The following description of tasks for the evaluation is intended to serve as an illustrative guide for respondents in developing a proposal for carrying out this evaluation. Respondents are encouraged to submit proposals that will best meet the objectives of the evaluation and may propose alternative means for achieving them within the total proposed level of effort.

Task 1- Background reading, Washington interviews, preparation of research design and research instrument development.

Prior to any field work, the evaluation team will review relevant documentation related to the Anti-Corruption Initiative and USAID's anti-corruption efforts in Africa generally, including:
- USAID's Anti-Corruption Strategy,
- the Africa Bureau Anti-Corruption Initiative paper,
- the original cable soliciting proposals from missions for the ACI;
- the proposals funded for each bi-lateral and regional program;
- the survey results from the Afrobarometer;
- all monitoring data from each country program;
- FY 2004 ACI Annual Report,
- the GAO Report "U.S. Anticorruption Programs in Sub-Saharan Africa Will Require Time and Commitment,"
- the new Strategy for Africa, and
- other documents to be determined in consultation with the ACI CTO.

The evaluation team will likewise interview relevant Washington staff, including AFR/SD/CPG, DCHA/DG staff involved in anti-corruption programming, and USAID MCA liaison staff.

During the period of background reading and Washington interviews, the evaluation team will develop the evaluation research design, select the sample of six African countries for site visits and prepare the data collection instruments and the data analysis plan.

Potential selection criteria could include high/low performers, regional/bilateral missions, MCA eligibility, and MCA Threshold eligibility. One non-recipient mission with significant anti-corruption programming will be included among the countries visited.

Initial contacts with these missions and travel arrangements will be made this week or the week after.

Task 2- Site Visits

The team will then conduct site visits to the targeted USAID missions and interview relevant stakeholders, including USAID staff, contractors and/or grantees, local implementing partners, government officials, and other intended recipients of USAID programming. This is anticipated to take approximately six weeks.

Task 3- Data Collection

The team will collect data from those ACI recipient countries the team did not visit, as well as one additional non-ACI recipient country by phone and/or email.

Task 4- Data Analysis, Oral Briefing, Draft & Final Report

Once the research phase is concluded, the team analyzes the data, and provides an oral briefing in USAID Washington to AFR/SD/CPG to discuss findings, conclusions and recommendations.

The team will prepare and submit a draft report AFR/SD/CPG ACI CTO, who will provide written comments to the team. A final report will then be prepared and submitted.

It is estimated that performance of work under this order will require 67 days.

PERSONNEL REQUIREMENTS

USAID intends to engage the services of a two-person professional team to conduct this evaluation. Specifically, USAID seeks knowledgeable individuals with the following profiles:
1) An **anti-corruption expert** with 5 years or more of experience in assessing corruption and designing and implementing activities to address it, preferably with significant experience in Africa. Masters level or higher degree in a relevant field. Some experience with evaluation preferred. French or Portuguese language skills preferred.
2) An **evaluation expert** with 5 years or more of experience in evaluating democracy and governance or other programs with an anti-corruption component, preferably with significant experience in Africa. Masters level or higher degree in a relevant field. French and/or Portuguese language skills preferred.

Key Personnel (and Estimated Days):

1. Anti-Corruption Specialist (67 days)
2. Evaluation Specialist (67 days)

<u>TECHNICAL DIRECTION AND COORDINATION</u>

The ACI Cognizant Technical Officer (CTO) in AFR/SD/CPG will be the primary point of contact for this evaluation and will provide feedback on the evaluation research design, data collection instruments, analysis plan, and overall work plan and on the draft and final reports.

USAID missions will provide information and facilitate access to their anti-corruption programming, implementation partners, and stakeholders involved in implementation of ACI-funded activities and, if pertinent, other anti-corruption activities.

USAID/Washington staff, including AFR/SD/CPG, DCHA/DG, and other relevant staff will provide information on the ACI and on their perceptions of the ACI and provide feedback on the draft evaluation.

As noted above, one ACI non-recipient mission will be included in the evaluation as a control against the ACI recipients. The evaluation team will receive similar information on and access to their anti-corruption programming, implementing partners, and stakeholders from the selected non-recipient mission will provide

The ACI CTO will provide all project documents to the evaluation team and will assist the team with the preliminary logistics (initial contact and necessary clearances) with the missions.

3. DELIVERABLES

The evaluation team's deliverables shall include:
- o A written workplan, that includes the research design, the draft data collection instruments and the data analysis plan due after the first week and a half;
- o Oral presentation to USAID of the workplan;
- o Final research plan and data collection instruments at the end of the first two weeks;
- o Oral presentation at the end of the field work and initial data analysis; and
- o A final report, the draft of which will be due to the ACI CTO within one month after completing the last country evaluation. (Please see Attachment B for an Evaluation Review Score Sheet to guide writing of the draft report.)

The CTO will distribute the draft report for comment to the USAID missions and relevant USAID/Washington staff and will return written comments to the evaluation team within three weeks of receiving the draft report. Three weeks after USAID's comments are provided, a final report will be due to the CTO. An oral presentation of the assessment findings is to be provided to USAID/W within two months of approval and acceptance of the final report.

Attachment A - Description of Initiative Programs

BENIN
The goal of USAID/Benin's work plan is to support the crosscutting USAID/Benin special objective, *Improved Governance in Social and Productive Sectors*, supporting the Mission's Intermediate Result No 2: *Strengthened mechanisms to promote transparency and accountability*. This objective will be realized through fulfillment of the following three sub-Results:

1. Reinforcing Supreme Audit Institutions' capacities;
2. Strengthening civil society's anti-corruption role; and
3. Improving competition and transparency in public procurement.

The Mission's ACI activities are designed to cut across all of its strategic objectives by mobilizing, stimulating, and linking its anti-corruption partners in ways that will reinforce implementation of social and economic reforms.

KENYA
With funding through the AFR Anti-Corruption Initiative, USAID/Kenya is supporting parliamentary watchdog committees (Public Accounts, Finance, and Investments). In addition, the mission is supporting civil society organizations that advocate for transparency and sustain pressure for reform. The mission's efforts are designed to promote:

1. Greater public awareness of corruption and access to information about government processes;
2. More rigorous monitoring by parliament, civil society, and the private sector; and
3. Mechanisms for dialogue and debate among civil society, the private sector, and GOK bodies, particularly parliament.

MADAGASCAR
The mission launched the anti-corruption component of its good governance program in June 2004. The program builds on the opportunities created by election of a new President, Marc Ravalomanana, who has been active in addressing corruption since he assumed office, launching an Independent Anti-Corruption Bureau and national anti-corruption plan this fall. The mission's program will continue to lay the institutional groundwork for successful implementation of the country's recently signed MCA compact. The program is designed to strengthen both government and civil society capacity to address and advocate against corruption as well as increase public awareness about the impact of corruption by:

1. Improving the capacity of government institutions to systematically address the issue of corruption nationwide;
2. Strengthening a cadre of "anti-corruption" champions among civil society and the private sector to better represent citizen's views; and
3. Stimulating grassroots demand for stronger anti-corruption measures.

MOZAMBIQUE
USAID/Mozambique is building on opportunities to attack the problem of corruption at the service delivery level – where it impacts citizens most. The mission's strategy for reducing corruption in Mozambique is two-pronged. First, it has funded creation of seven Corruption Reporting Centers that are providing citizens with legal advice, ombudsman services, and a mechanism for confidentially reporting corruption-related crimes to the Attorney General's office.

All seven centers are operational. In addition to municipal level activities to address corruption in service delivery and management of public resources, USAID is mainstreaming anti-corruption activities to focus on improving transparency in selected government operations which may include access to land, business registration, health procurement systems, and ARV distribution. These national level activities include strengthening the enabling environment for local leaders to reduce corruption, promoting civil society advocacy, and strengthening enforcement mechanisms.

RWANDA
USAID/Rwanda is fighting corruption in newly-decentralized local governments by establishing mechanisms for citizen participation in community planning, management, and monitoring of development activities that are funded through District Community Development Councils and District Health Offices. District authorities and civil society are being trained to develop and monitor budgets and make use of the Auditor General and Office of the Ombudsman to report mismanagement. Training is being provided in ethics for GOR officials and in investigative reporting for journalists.

SOUTH AFRICA
USAID/South Africa's anti-corruption activities are designed to support, extend, and complement the Government of South Africa's initiative to prevent, investigate, prosecute, and adjudicate corruption, and to recover assets obtained through the "abuse of power for private gain." ACI funds were used to expand and scale up activities that had been underway for three years. The mission's program is funding creation of new commercial crime courts, a forensic auditing unit at the Department of Justice, training of prosecutors and investigators, and investigative journalism training. In addition, the mission is addressing local level corruption through the building of local government capacity building in transparent hiring, procurement, and citizen complaint resolution; creation of public accounts committees to monitor local expenditure; and support of a network of anti-corruption NGOs for monitoring local and national government activities.

TANZANIA
USAID/Tanzania is implementing a program to make official government data widely available through the internet. At the same time, the activity will provide training to civil society organizations, the media, and parliament so that they are better able to access, analyze, and disseminate this information to the broader public. The mission's program will also develop a model for budget tracking at the local level in selected districts that can be replicated in other districts. All of these activities are intended to increase the accountability of officials to their constituents and decrease the opportunity for misappropriation of government funds.

ZAMBIA
USAID/Zambia is implementing a program to improve the fiscal oversight capacity of the Zambian National Assembly and support the role of the Auditor General, as well as NGOs, to monitor the National Assembly and its fiscal committees in their oversight capacity. The program is part of the mission's broader Parliamentary Reform Project. Specifically, the program:
1. Builds the capacity of the National Assembly's Public Accounts Committee (PAC) to access data and analyze public spending in a timely and effective way and of the Estimates Committee so that it can analyze budget bills with a view to ensuring transparency and accountability.
2. Provides technical assistance to the Auditor General's Office (AGO) on conducting investigations of fiscal abuse and reporting to the PAC.

3. Strengthening of the Parliamentary Research Service to support the oversight work of the committees.
4. Assistance to anti-corruption NGOs to enable them to offer informed advice and criticism of the government's fiscal performance to parliamentary committees through testimony and written reports.
5. Assistance with the creation of an Anti-Corruption Sub-Committee to track corruption issues and report to Parliament.
6. Organization and funding networking and learning to provide tools and skills to build capacities of all of the above.

REGIONAL MISSIONS
The initiative allocated resources to USAID's regional missions in Ghana, Kenya, and Botswana for regional anti-corruption programs in West, East, and southern Africa, respectively. The regional programs focus on improving the capacity of both governmental and non-governmental regional organizations to work with one another on adopting and institutionalizing anti-corruption mechanisms and protocols across countries; improving regional capacity for data gathering and analysis; supporting regional media organizations and other professional networks; and providing technical assistance and training to bilateral field missions and staff regarding anti-corruption programming (except for USAID/SA).

USAID- West Africa
The mission is working to build both regional and country-specific capacity of community service organizations (CSO) to promote transparency by improving the networking and communication capacity of key CSOs. In Sao Tome and Principe, USAID/WA is using ACI funds to enhance good governance and transparency, as part of a GDA with Chevron Texaco, to help the country manage its anticipated oil revenues. Regionally, USAID/WA is helping to build the capacity of ECOWAS to ensure the transparent and efficient delivery anti-retroviral drugs in the region.

USAID-South Africa
RCSA's program will support Transparency International Zimbabwe, which is the home of the regional TI office, in improving the capacity of journalists in the region to investigate and report on corruption. The mission will fund the Afrobarometer to conduct surveys in the region that will be used to encourage advocacy and policy reform to reduce corruption and serve as data for measuring results. ACI funding will also be used to build the capacity of anti-corruption organizations in a number of regional countries.

USAID- East Africa
USAID/EA has hired a Senior Anti-Corruption Advisor to provide technical assistance to bilateral missions in the region on anti-corruption. The mission's ACI activities will focus on equipping journalists for effective anti-corruption reporting; empowering watchdog parliamentary committees through the East African Association of Parliamentary Accounts; and supporting anti-corruption efforts along the Northern Corridor that runs through Kenya, Rwanda, Burundi, and Uganda.

APPENDIX 3: INDIVIDUALS AND ORGANIZATIONS CONTACTED

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ONG Alcrer
Martin Assogba, Le President

FONAC
Maximillien Sossou Glou, President

Jean Baptiste Elias, 1st Vice President

K. Léontine Idohou, 2nd Vice President

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Théodule Nouatchi, Trésorier Général

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Commission Nationale de Régulation des Marchés Publics

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Embassy of Japan
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Lalaina Rakotoarisoa, Magistrat Conseiller Juridique

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DFID Tanzania
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APPENDIX 4: DOCUMENTS CONSULTED

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USAID Anti-Corruption Activities, Source: FY2002 R4s, Implementing Partners Africa Bureau Information Center, Center for Democracy and Governance Information Unit, Compiled by the G/DG Information Unit, May 2001, 11pp.

FY 2005 Anti-Corruption Initiative Allocations. 8pp.

Administrator's/President's Initiatives – Concept Papers, Africa Bureau Anti-Corruption Initiative Draft May 20, 2005, 6 pp.

Annex G Country Selection Criteria, pg 50-51.

Anti-Corruption Initiative (ACI) First Annual Report, Management Systems International, ACI Contract AEP-I-00-00-00009-00, Task Order 4, January 14, 2005. 110pp.

Africa Bureau Anti-corruption Initiative Update Draft, May 11, 2005. 3 pp.

USAID/Benin, "Antic-Corruption Initiative- Proposal for the Africa Bureau: Action Plan for Fighting Corruption to Improve Good Governance in Benin." Cotonou, April 28, 203. 10 pp.

Cable - Africa Bureau Anti-Corruption Initiative Proposals, January 30, 2003. 3 pp.

Fighting White Collar Crime in South Africa

Tough prosecutors take down nation's corrupt politicians and slickest criminals in USAID-supported program, 2 pp.

Proposal, Afrobaraometer Round 3 An Unsolicited Application for a Three-Year Grant, Submitted by: Michigan State University (MSU), August 11, 2004. 9 pp.

USAID/Kenya Action Plan for the AFR Anti-Corruption Initiative, 11 pp.

Madagascar Anti-Corruption (MAC) Program, April 30, 2003. 10 pp.

USAID/Mozambique, Africa Bureau Anti-Corruption Initiative, Five Year Action Plan, 7 pp.

Africa Bureau Anti-Corruption Initiative, USAID/Nigeria , Five-Year Action Plan for Increased Transparency and Accountability of Budget and Procurement Processes, 12 pp.

USAID/RCSA Anti-Corruption Initiative Work Plan, FY 2003 – FY 2007, 9 pp.

REDSO's Anti-Corruption Initiative Action Plan, 11 pp.

RSA Proposal for Anti Corruption Initiative Part 2 Final, A Proposal to Support South Africa's Anti-Corruption Campaign, 11 pp.

Rwanda 2003 Anticorruption Proposal Anti-corruption Concept Paper and Five-year Action Plan Rwanda Increased Community Accountability Model (RICAM), 9 pp.

Status of the Africa Bureau Anti-Corruption Initiative (ACI) 9/2/2004, 1 p.

Tanzania Revised AC Proposal 2003, USAID/Tanzania, Five-Year Anti-Corruption Initiative Proposal, 10 pp.

WARP Anticorruption Strategy 2003, West Africa Regional Program Anti-Corruption Work Plan, 11 pp.

Zambia Anti-Corruption Initiative, PROPOSAL: USAID/Zambia, SHORT TITLE: ACI (Zambia)DATE: April 29, 2003, 10 pp.

GAO, Report to the Subcommitee of African Affairs, Committee on Foreign Relations, US Senate. "Foreign Assistance: US Anti-Corruption Programs in Sub Saharan Africa Will Require Time and Commitment". April 2004. 74 pp.

APPENDIX 5: EVALUATION TEAM ITINERARY 2006

GHANA

Accra, January 7-15

BENIN

Cotonou, January 15-21

NIGERIA

Lagos, January 21-?

Abuja, January ? -30

SOUTH AFRICA

Johannesburg, January 30- February 5

MADAGASCAR

Antananarivo, February 5- 10

TANZANIA

Dar es Salaam, February 10-18

KENYA

Nairobi, February 18-25

APPENDIX 6: AREAS OF INQUIRY

Individual Missions: Implementation, Management and Programmatic Achievement

In what way(s) is the Anti-Corruption Initiative relevant to Democracy and Governance programming in *your* mission?

In what way(s) is it not?

Is there an ongoing need for technical assistance regarding your use of ACI funds?

Have you considered employing an anti-corruption advisor?

Please explain your decision… .

Can you specify how ACI funds have been used to achieve results on the demand side of anti-corruption measures?

Can you specify how ACI funds have been used to achieve results on the supply side of anti-corruption efforts?

Is this how you measure your progress?

What types of "lessons learned" can you identify from your experience with the Initiative programming to-date?

>Budget management
>Program design and Implementation
>Identification and measuring results

Have you requested and received technical assistance?

>Identify type(s) and source

Did that technical assistance meet your needs and expectations?

Is there anything in your experience with the ACI to suggest that a redesign of the intervention might be appropriate?

>Please identify… .

Is it advisable to continue the Initiative as a dedicated source of funding or should those funds become part of general budget programming?

Should the Initiative be continued?

Bilateral and Regional Missions

Is the Initiative meeting your (bilateral/regional mission, implementing partner(s)) expectations?

Is the ACI an effective vehicle for interactions between bilateral and regional missions?

What have been the contributions of the Regional Missions:

> To general ACI programming?
> To achievements of the Initiative?

Does the ACI dedicated funding approach add value to anti-corruption efforts in Sub-Saharan Africa?

Does this format create operational or management problems for bilateral or regional missions that receive funds?

<u>Missions & AID/W</u>

Is the ACI an effective vehicle for interaction between bilateral or regional missions and AID/W?

Is knowledge management being effectively used to draw and share lessons of and for this initiative?

Have additional targets of opportunity for anti-corruption programming been identified as your ACI intervention has evolved?

> Please identify… .

Have MCA Threshold/Eligible countries asked your Mission for assistance with their application process?

> Please specify… .

Have you been able to provide such assistance?

> Please describe …

In addition to the areas indicated in the preceding paragraphs, the team expects that its data gathering efforts will elicit responses that will help to answer the following set of questions concerning the Initiative:

- To what extent is the ACI fulfilling its original intention, as outlined in the USAID/AFR Anti-Corruption Initiative paper dated 9/13/2004? Is the Initiative still relevant?
- Which would be more beneficial to USAID Missions: continuing with a dedicated allocation of resources for corruption activities, or integrating ACI resources into the overall DG budget?
- What is the value that the regional missions add to overall ACI programming and to the ACI as a whole?
- What value-added does the ACI structure bring to USAID's overall anti-corruption programming in Africa? What lessons, if any, are being learned and transferred among Missions and within USAID/Washington on anti-corruption programming?
- Are there opportunities for the ACI that are not currently exploited?
- In what domains do you see such opportunities?