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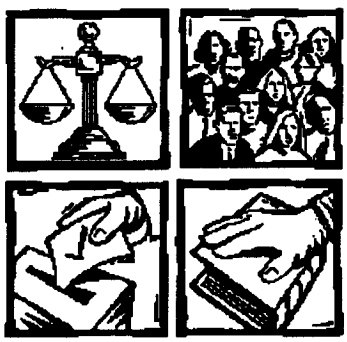
A HANDBOOK ON FIGHTING CORRUPTION



February 1999

Technical Publication Series

Center for Democracy and Governance
Bureau for Global Programs, Field Support, and Research
U.S. Agency for International Development
Washington, D.C. 20523-3100

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ABOUT THIS PUBLICATION

This handbook is intended to help USAID field staff make informed decisions withregard to developing anti-corruption strategies. It outlines a framework for evaluating country-specific causes and appropriate responses to corruption, and describes anti-corruption work carried out by USAID and other organizations.

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ABOUT THE CENTER

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The Center would appreciate your comments as to the appropriateness and utility of this handbook. Please contact the Center with any comments or suggestions.

ACKNOWLEDGMENTS

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A HANDBOOK ON FIGHTING CORRUPTION

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EXECUTIVE SUMMARY

This handbook presents a framework to assist USAID missions develop strategic responses to public corruption. The framework sets out root causes of corruption, identifies a range of institutional and societal reforms to address them, and introduces a methodology for selecting among these measures.

In general terms, corruption arises from **institutional attributes** of the state and **societal attitudes** toward formal political processes. Institutional attributes that encourage corruption include wide authority of the state, which offers significant opportunities for corruption; minimal accountability, which reduces the cost of corrupt behavior; and perverse incentives in government employment, which induce self-serving rather than public-serving behavior. Societal attitudes fostering corruption include allegiance to personal loyalties over objective rules, low legitimacy of government, and dominance of a political party or ruling elite over political and economic processes.

Possible responses to these underlying causes of corruption include **institutional reforms** to limit authority, improve accountability, and realign incentives, as well as **societal reforms** to change attitudes and mobilize political will for sustained anti-corruption interventions. While the handbook offers detailed descriptions of different types of institutional and societal reforms, a strategy to fight corruption cannot and need not contain each of the institutional and societal reforms discussed. Strategy choices must be made after taking into account the nature of the corruption problem and the opportunities and constraints for addressing it.

Because a strategy must be tailored to fit the particular circumstances of a country, designing a strategy requires assessing the level, forms, and causes of corruption for the country as a whole and for specific government institutions. In particular, strategy formulation requires taking a hard look at the level of political will for anti-corruption reform in government and civil society. Opportunities for reform can stem from reformists' tendencies within the government, a change in government, public outrage over scandals, an opposition movement, an economic crisis, or external pressure. It is also essential to take careful stock of potential supporters and opponents within the ruling parties, the opposition, the judiciary, and the military, among others. The assessment must consider each party's interests and motivations and how these might play into an anti-corruption strategy.

If there is little or no opening to work in anti-corruption, the strategy should focus on societal measures to increase awareness of the problem and develop a constituency for reform. However, if openings are partial or significant, the strategy should combine societal reforms to institutionalize political will with targeted institutional reforms. The strategy should target institutions (such as the judiciary, police, or customs, licensing, procurement, and tax offices) where the problem of corruption is serious, yet the opening to work there is substantial (e.g., where there is a pro-reform minister).

Coordination with other multilateral and bilateral organizations and NGOs is critical to USAID's work. Accordingly, the final section of the handbook describes the work of other organizations involved with anti-corruption initiatives.

I. INTRODUCTION

This handbook aims to assist USAID missions and their partners develop anti-corruption initiatives. It draws upon the growing literature and practical experience in this field to provide guidance on strategies for fighting corruption. Although the problem itself is not new, opportunities to work in this area have emerged only recently. Indeed, corruption is no longer a taboo topic, but one that policymakers, businesses, civil society organizations, media, and donors from all regions are confronting openly.

A number of factors explain new interest in the issue. Since the end of the Cold War, donor governments have placed less emphasis on ideological grounds for foreign assistance and more emphasis on trade and development, both of which are undermined by corruption. At the same time, businesses have faced ever stiffer competition with the globalization of trade and capital markets, and have become less willing to tolerate the expense and risk associated with corruption. On the other end of the trade process, countries with high levels of corruption have found themselves less able to attract investment in a competitive global market. Over the same period, transitions to democracy have enabled citizens to use the vote and new-found civil liberties (e.g., freedom of speech, of assembly, etc.) to confront corruption, prompting leaders and opposition figures to show strong anti-corruption commitment.

This handbook on anti-corruption programming contains five sections. Section II lays out the development problems posed by corruption and articulates the need for anti-corruption programming. Section III provides a framework for developing responses to these problems. It identifies root causes of corruption which call for both institutional and societal reforms to address them. For both categories of reform, the handbook presents an inventory of anti-corruption measures. The handbook then lays out a framework for selecting among these measures to design a USAID anti-corruption strategy in a specific country. This framework includes a methodology for assessing the nature of the corruption problem and the opportunities and constraints for addressing it. The framework links the assessment to a strategy, offering guidelines for prioritizing and sequencing anti-corruption activities in various situations.

Section IV of the handbook provides an overview of USAID anti-corruption efforts to date. It describes global bureau and regional bureau initiatives in Washington as well as missions' initiatives since 1996.This section also suggests indicators for reporting results.

Section V provides an overview of the activities of other donors and organizations working in anti-corruption and lists contracting mechanisms available for obtaining assistance in this area. It directs readers to additional information on recent anti-corruption initiatives by international organizations such as the World Bank, the Organization for Economic Cooperation and Development (OECD), the International Monetary Fund (IMF), and the Organization of American States (OAS); private and nongovernmental organizations; and other agencies of the US government.

II. COSTS OF CORRUPTION

In broad terms, corruption is the abuse of public office for private gain. It encompasses unilateral abuses by government officials such as embezzlement and nepotism, as well as abuses linking public and private actors such as bribery, extortion, influence peddling, and fraud. Corruption arises in both political and bureaucratic offices and can be petty or grand, organized or unorganized. Though corruption often facilitates criminal activities such as drug trafficking, money laundering, and prostitution, it is not restricted to these activities. For purposes of understanding the problem and devising remedies, it is important to keep crime and corruption analytically distinct.

Corruption poses a serious development challenge. In the political realm, it undermines democracy and good governance by subverting formal processes. Corruption in elections and in legislative bodies reduces accountability and representation in policymaking; corruption in the judiciary suspends the rule of law; and corruption in public administration results in the unequal provision of services. More generally, corruption erodes the institutional capacity of government as procedures are disregarded, resources are siphoned off, and officials are hired or promoted without regard to performance. At the same time, corruption undermines the legitimacy of government and such democratic values as trust and tolerance.

Corruption also undermines economic development by generating considerable distortions and inefficiency. In the private sector, corruption increases the cost of business through the price of illicit payments themselves, the management cost of negotiating with officials, and the risk of breached agreements or detection. Although some claim corruption reduces costs by cutting red tape, an emerging consensus holds that the availability of bribes induces officials to contrive new rules and delays. Where corruption inflates the cost of business, it also distorts the playing field, shielding firms with connections from competition and thereby sustaining inefficient firms.

Corruption also generates economic distortions in the public sector by diverting public investment away from education and into capital projects where bribes and kickbacks are more plentiful. Officials may increase the technical complexity of public sector projects to conceal such dealings, thus further distorting investment. Corruption also lowers compliance with construction, environmental, or other regulations; reduces the quality of government services and infrastructure; and increases budgetary pressures on government.

These distortions deter investment and reduce economic growth. In quantitative terms, Mauro's analysis of 94 countries suggests that a reduction in corruption of 2.38 points on his 10-point scale would increase a country's annual investment by 4 percent of gross domestic product (GDP), and would increase annual growth of GDP per capita by 0.5 percent (Mauro 1997). The World Bank's *The State in a Changing World, World Development Report 1997* further refines this relationship between corruption and investment by distinguishing between the level of corruption and the predictability of payments and outcomes. It suggests that investment drops off most in countries where corruption levels are high but the predictability of payments and outcomes is nonetheless low.

III. DESIGNING A RESPONSE

A. Causes of Corruption

Responding to the development challenges posed by corruption requires an understanding of its causes. From an institutional perspective, corruption arises where public officials have wide authority, little accountability, and perverse incentives. This means the more activities public officials control or regulate, the more opportunities exist for corruption. Furthermore, the lower the probability of detection and punishment, the greater the risk that corruption will take place. In addition, the lower the salaries, the rewards for performance, the security of employment, and the professionalism in public service, the greater the incentives for public officials to pursue self-serving rather than public-serving ends. This institutional perspective suggests fighting corruption through the following:

- Reducing the role of government in economic activities (to limit authority)
- Strengthening transparency, oversight, and sanctions (to improve accountability)
- Redesigning terms of employment in public service (to improve incentives)

While this perspective gives us a parsimonious cut on the problem, it does not take into account socially-embedded incentives to participate in or withstand corrupt practices. Independent of opportunities, costs, and professional incentives within government institutions, general attitudes toward formal political processes influence corruption levels. A number of factors can predispose groups or societies to disregard formal rules. In many cultures, particularly in the context of poverty or conflict, allegiance to personal loyalties such as one's family or ethnic, religious, or socioeconomic identity outweighs allegiance to objective rules. Patronage systems, in fact, represent a common means of securing advantage through personal rather than formalized channels. In other cases, the low legitimacy of government (because it is repressive, ineffective, discordant with culture, or imposed by foreign rule) induces disregard for formal rules. Similarly, dominance of a political party or ruling elite over political and economic processes, or exclusion of marginalized or poorly organized groups from the same, creates incentives for those disadvantaged by the system to operate outside it.

These considerations suggest anti-corruption efforts should also address attitudes toward corruption. Most generally, such efforts need to raise awareness about the costs of corruption for the country's political and economic development. This means convincing the public that corruption is an extremely damaging pattern of interaction for society as a whole, and that the collective damages over time outweigh any possible short-term personal benefits. Along with raising awareness, these efforts need to stimulate demand for reform, helping mobilize citizens and elites to push anti-corruption onto the political agenda. To the extent possible, anti-corruption efforts should also address the underlying structures that create anti-system attitudes, for example, by improving the access of marginalized groups to the political arena.

Responses to corruption, therefore, include **institutional reforms** to limit authority, improve accountability, and change incentives, as well as **societal reforms** to change attitudes and mobilize political will for sustained anti-corruption interventions. Within these two broad categories, the list of potential responses is extensive. What follows is an inventory of institutional and societal reforms. Clearly, however, it is not possible or even necessary to undertake all these initiatives in an anti-corruption effort. The mix of initiatives, the relative emphasis placed on them, and the

sequence in which they should be pursued will vary from country to country and from time to time. For this reason, the handbook does not prescribe a model strategy for fighting corruption. Rather, it presents a framework for analyzing the problem and designing a strategy to fit the context. After presenting the inventory of possible initiatives, the handbook introduces a framework for deciding what needs to be done, in what sequence, and with what sort of political and economic support.

B. Inventory of Anti-corruption Measures

As discussed above, efforts to fight corruption include institutional reforms and societal reforms. Institutional reforms include measures to reduce government authority, increase accountability, and align official incentives to public ends. These measures target government institutions and processes in all branches and levels of government. Societal reforms, on the other hand, include measures to change attitudes toward formal political processes and to mobilize political will for anti-corruption reform.

1. Institutional Reforms: Limiting Authority

Privatization—Privatization offers a clear means to limit the authority of government. By removing the government from economic activities, it eliminates opportunities for recurrent corrupt dealing in sales, employment, procurement, and financing contracts. However, as many privatization programs have revealed, the process of privatizing state-owned enterprises and government services itself is vulnerable to corruption. To ensure the integrity of the process, privatization requires special measures of transparency. In addition, successful privatization programs require adequate regulatory and commercial legal frameworks to protect consumers and investors and to create conditions for competition. Without these frameworks in place, privatizing government operations may only shift rent-seeking from the public to the private sector. Indeed, in many developing and transitional countries, unregulated or poorly administered privatization has enriched insiders through skewed prices and conversion of public monopolies to private ones.

Liberalization—Liberalization offers a more straightforward means to limit state authority. Eliminating tariffs, quotas, exchange rate restrictions, price controls, and permit requirements simply strips officials of the power to extract bribes. At the same time, removing such controls reduces transaction costs, eliminates bottlenecks, and fosters competition. In recent years, accession requirements to the World Trade Organization (WTO) have pushed many countries to liberalize their economies. For example, in joining the GATT (the WTO's predecessor) Mexico dropped the percentage of imports subject to licensing from 92 percent to 22 percent and reduced the average tariff from 23.5 percent to 12.5 percent. Transitions from communism have also entailed substantial recision of controls. A special presidential commission in Ukraine, for example, recently reduced the number of licenses required to open a business from 100 to about 55.

Competitive Procurement—Competitive procurement limits the authority of government officials thereby guarding against corruption. Competitive procurement removes personal discretion from the selection of government suppliers and contractors by prescribing an open bidding process and laying out clear procedures and criteria for selection. Because a corrupt procurement process can derail their development efforts, donors are making procurement reform a priority. For example, as an outcome of the 1997 Global Coalition for Africa's Policy Forum on Corruption, the World Bank is assisting the governments of Benin, Ethiopia, Malawi, Mali, Tanzania, and Uganda reform their procurement procedures. Yet, absent such government leadership, private firms may foster a competitive process. Through

anti-bribery pacts such as Transparency International's "islands of integrity" approach, bidders agree not to pay bribes for a government contract and post sizable bonds that are subject to forfeiture in the event of non-compliance. Firms in Ecuador, Argentina, and Panama are experimenting with anti-bribery pacts.

Competition in Public Service—Competition in public service reduces opportunity for corruption by removing the monopoly power of any one government office. In so doing, it discourages extortion since customers can take their business to a competing office when confronted with irregular demands or service. Overlapping jurisdictions, in the case of motor vehicle bureaus or passport agencies, or private and public provision of service, in the case of mail delivery or trash removal, are two ways of instituting competition in public service.

2. *Institutional Reforms: Improving Accountability*

Improving accountability entails efforts to improve both the detection and the sanctioning of corrupt acts. Better detection requires measures to improve transparency and oversight while better sanctioning involves establishing criminal and administrative sanctions, strengthening judicial processes, and improving electoral accountability. A description of such measures follows.

Freedom of Information Legislation—Freedom of information legislation improves accountability by enhancing the transparency of government operations. It counteracts official secrets acts and claims of national security that impede corruption inquiries. Freedom of information legislation also informs citizens of the procedures for government service, curtailing attempts to subvert the system or to demand gratuities for information that legally should be public. The Ugandan government, for example, now displays in relevant offices the regulations, procedures, and fees for public services such as registering a vehicle or starting a company.

Financial Disclosure—Financial disclosure laws improve accountability by enhancing the transparency of officials' finances. The laws require public officials to declare their assets and incomes and so act as a deterrent to profiting through corruption. Public officials can include cabinet ministers, members of parliament, and top civil servants. In some countries, laws require declarations upon accession to and departure from office. Other laws prescribe yearly monitoring. Countries including Argentina, Brazil, Chile, Nicaragua, Poland, Sierra Leone, Uganda, Tanzania, Sri Lanka, and Russia have recently passed such legislation. While in most cases the laws have elicited declarations, public access to them or verification of their accuracy has often been a problem.

Open Budget Process—Open budget processes improve accountability by enhancing transparency of government expenditures and income. While the principle applies equally to national and local level budgets, the immediacy of local government provides an impetus and entree for citizens to participate in the process that are often missing at the national level. For this reason, recent efforts to promote transparent budgeting have concentrated on the local level. For example, decentralization programs in Bolivia, Paraguay, and El Salvador have featured improved citizen participation in and oversight of local budget processes.

Financial Management Systems and Audit Offices—Modern financial management systems improve accountability by enhancing transparency and oversight in government operations. Originally developed in response to the 1987 financial collapse in New York City, these systems apply high technology to the fight against financial mismanagement and corruption. Measures to improve financial management systems involve design of financial

software, installation of hardware, and training of accounting and audit staff. Tools for financial management systems include the following:

- High-speed computer comparisons of data that can disclose such abuses as duplicate payments to suppliers, double-salaried staff, and retirees drawing remuneration
- Computer-assisted audits allowing selected sampling of activities subject to abuse
- Automatic flash points that call attention to repetitive or inappropriate budgetary maneuvers, or to deviations in areas of high vulnerability
- General ledger controls over valuable resources such as land, buildings, vehicles, computers, and electronic equipment
- Single bank accounts used to consolidate public funds and eliminate "off-budget" expenditures

Many governments in Latin America are installing financial management systems. For example, in 1996 Argentina announced a program to use modern methods of financial management to detect and prevent fraud in decentralized social security, customs, taxation, health insurance, and medical assistance agencies.

Inspector General/Ombudsmen/Anti-Corruption Agency—These government offices improve accountability by overseeing government operations. In general, they look into allegations of mismanagement and review administrative systems to ensure they adhere to anti-corruption procedures. Specific responsibilities and titles of these offices vary from country to country. For example, review of corruption allegations is undertaken by the Inspector General in Uganda, the Anti-Corruption Bureau in Tanzania, and the Unit for Monitoring Accountability and Transparency in Sierra Leone. In many cases these offices function narrowly as ombudsmen, registering citizen complaints and serving as public advocacy offices. In other cases, such as with Bolivia's UDECO (*Unidad de Defensa Del Ciudadano contra la Corrupción*), they coordinate anti-corruption efforts among agencies. Still others have investigatory and prosecutorial powers (e.g., Peru's Tribunal for Public Ethics, Uruguay's *Defensoría del Pueblo*, and Botswana's Directorate on Corruption and Economic Crime). The Directorate on Corruption and Economic Crime (DCEC), modeled after a similar agency in Hong Kong, not only investigates and prosecutes offenders, but designs strategies to prevent corruption and engages in public education. Officially under the president's jurisdiction, it is operationally independent and can prosecute whomever it wishes. Although hampered by a slow court system, it boasts a high conviction rate and has collected fines in excess of its operating costs.

Legislative Oversight—Legislative oversight provides a powerful check on executive authority, enhancing accountability where a dominant executive branch might otherwise operate with impunity. To be effective, however, legislatures require such resources as a technically competent staff, strong committees, budgetary independence, significant bureaucratic oversight powers, and a constitutional role in approving political appointments. In many countries, legislatures lack such resources and are thus manipulated or bribed by strong executives. Programs to modernize legislatures and workshops to help members of parliament understand their role in governance aim to strengthen their oversight capacity. Requiring that anti-corruption agencies report to parliament, rather than the executive, also facilitates legislative oversight. Recently, amendments to legislation in Zambia and Uganda have directed the Anti-Corruption Commission and the inspector-general, respectively, to report to parliament rather than the head of state.

Since the late 1970s, restoration or establishment of democracy has produced stronger legislative bodies in many countries. Most notably in Latin America, newly-restored legislatures have taken a leading role in combating executive branch corruption. The most conspicuous example of this was the congressional impeachment of Brazilian President Fernando Collor de Mello, initiated by the Parliamentary Commission of Inquiry. More recently, the Brazilian Senate formed a special committee to investigate allegations that government officials had been involved in fraudulent sales of government bonds. As another example, the Kuwaiti parliament has become quite assertive since its reinstatement following the Gulf War. Recently, it divulged the royal family's practice of demanding kickbacks for favors and exposed corrupt procurement procedures in the Ministry of Defense.

Hot Lines and Whistle-Blower Protection—Hot lines improve accountability by enlisting co-workers, businesses, and citizens to report corrupt acts. The government office responsible for investigating such acts often operates a hot line. For example, in Hong Kong, the Independent Commission Against Corruption runs a hot line and guarantees that every allegation is investigated. It also protects those who make reports by granting file access to officers on a "need to know" basis only. However, in cases where anonymity cannot be guaranteed, those who protest corruption often place themselves at risk. In many countries, whistle blowers are often fired or punished, subjected to administrative harassment, and exposed to violence. For this reason, anti-corruption efforts need legislation to protect whistle blowers from official sanctions or even to reward them. Uganda, in fact, is now considering a recommendation to reward officials who provide information leading to the successful recovery of embezzled public funds.

Sanctions—Applying sanctions to corrupt acts is an important step toward establishing accountability. In large part, sanctions are centered on legislation to criminalize corruption, which many countries have introduced in recent years. For example, in Uganda in 1995, the Law Reform Commission established that all embezzled monies must be returned to the state; misappropriated properties or goods must be forfeited; and mandatory minimum sentences must be given for each offense. Similarly, in Malawi, the Corrupt Practices Act of 1995 prescribed criminal penalties for soliciting, offering, and accepting bribes, and authorized recovery of illicit proceeds from corruption.

In some countries, penal codes allow prosecution not only for direct evidence of bribery, but also for possessing wealth and income that cannot be traced to lawful activities. Such laws have been used successfully against drug lords in Colombia and against the brother of former President Carlos Salinas de Gotari in Mexico. A few countries, such as Thailand and Hong Kong, even place the burden of proof on the accused—a government official can be required to show that his or her wealth, and perhaps that of immediate relatives, was acquired legally. This issue was a point of disagreement during deliberations over the 1996 Inter-American Convention against Corruption. Many Latin American countries argued that requiring the government to prove illicit enrichment would be ineffective and that the burden of proof should be placed on the accused. The United States argued that the presumption of innocence ought to be a constitutional principle. Negotiations ultimately settled on the latter position.

In addition to criminalizing corruption, governments can establish sanctions for smaller cases of corruption outside the formal legal system. Authorities can fire public officials engaged in corrupt deals and render them ineligible for pension distributions or future public employment. Authorities can also deny

public services to users found offering bribes, or revoke their eligibility to bid on procurement and privatization contracts, either on a permanent basis or for a period of time.

Judicial Reform—Accountability requires not just establishing sanctions, but enforcing them on an impartial basis. Without enforcement, tough laws have no impact on reducing corruption, and may foster general cynicism about reform efforts. Yet to hold public officials accountable to anti-corruption laws, judiciaries need independence from the executive branch as well as institutional capacity. Strengthening judicial independence involves revising procedures for appointing, assigning, remunerating, and removing judges and prosecutors to insulate them from political influence. In some cases, judicial reforms have established an independent prosecutor, in addition to the public prosecutor, to carry out investigations of senior officials. Strengthening the institutional capacity of the judiciary, meanwhile, involves modernizing court systems to facilitate swift and fair procedures. This can be done by augmenting and upgrading staffs, improving legal training, establishing codes of conduct for judges, attorneys, clerks and litigants, and strengthening investigatory capabilities.

In recent years, targeted efforts to strengthen judicial independence and capacity have been most extensive in Latin America. A number of countries in the region have undertaken ambitious reforms to improve the skills, procedures, and infrastructure of the courts, often with donor assistance. Most notably, efforts to strengthen the office of prosecutor have gathered force. In Colombia, for example, the 1991 Penal Process Code grants significant investigatory powers to its *Fiscalia General* (Attorney General). This official is appointed to a four-year term by the Supreme Court and cannot be dismissed or reappointed. Colombia's *Fiscal General*, Alfonso Valdivieso, has achieved international renown for his prosecution of drug lords and high government officials. Operating with administrative and budgetary autonomy, the office investigates and brings charges before judges, directs and coordinates the functions of the Judicial Police, and protects victims, witnesses, and others involved in proceedings. As another example, the Honduran Public Ministry Law of 1993 created an independent and autonomous *Fiscalia General*. Among its five agencies is the *Fiscalia General contra la Corrupción* (Attorney General against Corruption), which has considerable resources and staff. For the first time in the country's history, the *Fiscalia General* leveled charges against widespread corruption in the military.

Independent of such judicial reforms, political shifts can also provide openings for judicial assertiveness. The Indian Supreme Court, responding to a public interest lawsuit by journalists, put pressure on investigators to stop delaying a trial process. Public opinion polls show widespread backing for the court's activism that now extends to environmental and consumer protection, public health, campaign finance, and market reforms. Surveys rate it India's most trusted institution, followed by the press, with parliament last.

Elections—Free and fair elections provide an important mechanism for holding public officials accountable. Citizens can withhold votes from incumbents as a sanction against corruption, and elect opposition candidates denouncing such dealings. In Mexico, Tanzania, and Bulgaria, for example, voters have elected opposition candidates running on anti-corruption platforms. However, to work as a check on officials' actions, elections must be accompanied by meaningful guarantees of civil liberties to vote and run for office, as well as by fair voting procedures. Campaign finance poses a particular challenge for fairness and can be a significant source of corruption. For this reason, campaign finance reforms that limit or regulate donations, require disclosure of funds, provide free

television time, and eliminate off-budget government funding sources are an important component of accountability.

3. *Institutional Reforms: Realigning Incentives*

Institutional reforms to fight corruption also include incentives to promote ethical behavior in public service. Such incentives feature active human resources management to develop a professional, committed work force. As a first step, personnel systems can eliminate unnecessary positions and reduce the number of employees through hiring freezes and attrition, retirement packages, dismissals, and removal of ghost workers from payrolls. Personnel systems can also tighten job requirements, establish anti-nepotism regulations, develop codes of ethics, and provide training where needed. Compensation systems must then provide a living wage, but also ensure sufficient remuneration to attract and retain qualified personnel. In some cases, salary increases can be financed through reductions in force. In addition, performance-based incentives can bolster morale, professionalism, and productivity. Systems can link performance to compensation or to such non-monetary rewards as more challenging tasks, influential assignments, public recognition, and professional awards. Regular performance assessments become necessary components of an incentive system.

In the 1980s, Ghana introduced institutional reforms in tax and customs administration. The government dismissed or retired the most corrupt officials, improved wages and working conditions, and offered performance incentives for individuals and for the National Revenue Service as a whole. Revenue targets were established, and the National Revenue Service was given a bonus of 3.5 percent of tax revenue and 2.5 percent of customs revenue. As a result, tax and customs revenue rose from 6.6 percent to 12.3 percent of GDP between 1984 and 1988.

4. *Societal Reforms: Changing Attitudes and Mobilizing Political Will*

In addition to institutional reforms, efforts to fight corruption include societal reforms to change attitudes toward formal political processes and to mobilize political will for change. Societal reforms generate new information about the costs and causes of corruption to stimulate demand for change and provide guidance on what to change. Societal reforms also foster structures to facilitate monitoring and advocacy by civil society. Without the mobilization of civil society, governments are unlikely to follow through on anti-corruption reforms once they enter politically difficult terrain.

Surveys—Surveys work to change attitudes and mobilize political will by defining the problem and focusing efforts to address it. Surveys can address the issue of corruption directly (e.g., corruption perception surveys) or approach it indirectly in politically sensitive situations (e.g., service delivery surveys). Corruption perception surveys ask individuals or businesses for their perception or experience of corrupt practices, often generating comparisons across branches and levels of government for national surveys, or across countries for international surveys. In its annual Corruption Perception Index, Transparency International draws upon seven international surveys of business people, political analysts, and the general public to rate approximately 50 countries on perceived levels of corruption. Service delivery surveys, by contrast, ask public service users about their satisfaction with specific services, such as utilities, housing, health, or education. While they may ask the total cost, waiting time, and negotiating time for service, these surveys do not ask for an appraisal of the level of corruption. They nonetheless provide essential information to help design reforms, monitor results, and ultimately make services more responsive to citizens' demands. The Economic Development Institute (EDI) of the World Bank

and CIET International have assisted governments conduct service delivery surveys in Bosnia, Nicaragua, Tanzania, Uganda, Mali, and Jordan.

Public Relations Campaigns—Public relations campaigns work to increase understanding about the harm done by corruption and the ways to fight it. Using the mass media, community activities, or school programs, they highlight the link between corruption and poorer public services, lower investment, smaller growth rates, and more inequality. They also emphasize citizens' rights to services and demonstrate that corrupt officials are stealing the public's money. At the same time, these campaigns articulate procedures for reporting corrupt practices and advocating for reform. Once people feel they have a stake in eliminating corruption and the means to do something about it, they can demand more action from their representatives and strengthen political will. Notable sponsors of public relations campaigns include *Poder Ciudadano*, an Argentine NGO that developed imaginative television and radio spots denouncing corruption and sponsored an anti-corruption poster contest for school children; and Hong Kong's Independent Commission Against Corruption which has used press releases, public information announcements, interviews, documentaries, posters, information leaflets, meetings, public speaking, and work on school and university curricula to convey an anti-corruption message to the public.

Investigative Journalism—Investigative journalism fosters anti-corruption attitudes and mobilizes political will for reform. In exposing corrupt acts, investigative reporting elicits popular indignation about corruption and puts pressure on the government to change. It is precisely this risk of exposure that motivates governments to censor the press and jail journalists. A free press, however, is not necessarily sufficient in the fight against corruption. In many countries, journalists need training about investigative techniques, professional standards, and newsroom organization. In Tanzania and Uganda, EDI organized workshops to train investigative journalists. These workshops were designed to raise the skills and confidence of journalists and to cultivate the media's commitment to fight corruption.

Civic Advocacy Organizations—Civil society, where it is free to organize and act, can become a vital partner in developing and strengthening ethical practices in the public sector. While a growing number of civic advocacy organizations (CAOs) have emerged to fight corruption, a range of other civil society organizations can contribute to the cause without being organized specifically for that purpose. Most prominently, business and professional associations can be weighty advocates for government reform and at the same time effective champions of professional standards and self-regulation. For example, in 1996, the International Chamber of Commerce adopted rules of conduct that prohibit extortion and bribery for any purpose. The Chamber is working with national governments to enact or strengthen legislation combating extortion and bribery. Similarly, bar and accounting associations have established task forces on corruption and added the topic to meeting agendas. Religious groups, such as the Islamic community in Indonesia, can also exhort their members and political leaders to resist corruption.

CAOs also have been formed to analyze corruption problems, monitor public officials, and advocate for government reform. A few, like the 70-plus national chapters of Transparency International, are dedicated entirely to fighting corruption, while others have a broader focus. In Bulgaria, The Center for the Study of Democracy, for example, focuses more broadly on economic and legal reform; *Alianza Civica* in Mexico aims to increase competition and the accountability of the political system; and *Groupe Nouvelle Ethique* in Benin works to change public attitudes toward work, education,

and democracy, as well as corruption. NGOs in other sectors, such as environment and health, are also developing their capability to advocate transparency and integrity. Consequently, in many countries, broad coalitions of CAOs have formed to fight corruption. Measures to strengthen their efforts include providing technical assistance and training on technical, financial, and organizational issues, and building an enabling environment to allow for their financial independence.

Workshops—Workshops offer an effective venue for changing attitudes about corruption and mobilizing political will for reform. Workshops strive to increase understanding of corruption and to generate practical strategies for reducing it. To do so, they rely on participatory diagnosis of the problems and development of an action plan, usually over the course of two to three days. Workshops—ranging from national integrity workshops with participants from the highest levels of government and civil society, to subnational workshops that bring together local political, economic, and social leaders, to workshops targeting a particular ministry or agency—can target many levels and parts of government. Transparency International and EDI have helped organize national integrity workshops in Uganda, Tanzania, Malawi, Mauritius, Ukraine, and Nicaragua.

International Pressure—Pressure from foreign governments and international organizations can mobilize and sustain domestic efforts to fight corruption. Bilateral diplomacy at the highest levels or through embassies, exhortations from international bodies such as the United Nations, and strong recommendations or conditionality from development assistance agencies can push reluctant reformers to address corruption issues. For example, World Bank president James Wolfensohn has effectively used his position to prod governments into action. International or regional treaties against corruption, such as the OAS Inter-American Convention Against Corruption, can also contribute to increasing official resolve to tackle the issues and initiate positive change.

C. Assessment Methodology

A strategy to fight corruption cannot and need not contain each of the institutional and societal reforms described. Rather, a strategy should fit the particular circumstances of a country, taking into account the nature of the corruption problem as well as the opportunities and constraints for addressing it. Therefore, designing a strategy requires an assessment of the extent, forms, and causes of corruption for the country as a whole and for specific government institutions. At the same time, strategy formulation requires taking a close look at the political will for anti-corruption reform in government and civil society. Such an assessment entails a political economy analysis of the reform process to identify supporters and opponents of anti-corruption reform and their respective interests and resources.

The extent of corruption provides the first analytical cut of the assessment. The extent of corruption can range from sporadic, occurring in isolated intervals with no apparent order, to pervasive, permeating most government institutions in a country or affecting most activities within a specific institution. Sporadic corruption can pose problems for development, but does not have the same corrosive effect on political and economic systems as pervasive corruption. While the detriment caused by pervasive corruption makes it a key development issue, the comparatively lesser damage caused by sporadic corruption may not merit spending resources that could be invested in other development objectives.

Determining the form of corruption is the next step of the assessment. Is the corruption petty, involving lower-level officials and smaller resources, or is it grand, operating at the highest levels of government with huge sums of money?

Is the corruption organized vertically, linking subordinates and superiors in a system of pay-offs? Is it organized horizontally, linking separate branches of government or agencies in a corrupt network? Is it not organized at all? Does the corruption entail unilateral abuses by government officials (e.g., embezzlement and nepotism) or does it link public and private actors (e.g., through bribery, extortion, and fraud)? Similarly, is the corruption linked to organized crime or the military, entrenched in patterns of patronage, or embedded in elite networks? Finally, in what government institutions is corruption concentrated? For example, is the chief problem found in the customs agency, in government procurement, in tax collection, or in the police?

The next level of analysis examines the causes of the different forms of corruption. For the country as a whole, what institutional problems or societal attitudes contribute to corruption? How do these institutional and attitudinal problems vary across institutions and regions within the country? For example, is the issue of wide government authority problematic in all areas or just in certain activities? Are there effective mechanisms of accountability or proper incentives in some institutions or levels of government? How do these operate? Are they replicable? Do anti-system attitudes vary across government institutions—between public education and tax collection, for example—or between national and subnational governments, or between different regional governments? Why?

Following an analysis of the corruption problem, the assessment must examine the opportunities and constraints for addressing it. The central issue for strategy development is the opportunity for reform in a country. While in many countries, there is limited or no opportunity to address the issue of corruption directly, in others, there may be partial or significant opening for reform. Openings to work in anti-corruption can arise from the following:

- A change in government (e.g., the election of Stoyanov in Bulgaria, the impeachment of Bucaram in Ecuador, the resignation of Suharto in Indonesia, or the death of Abacha in Nigeria)
- Public outrage around scandals (e.g., the 1973 scandal involving a high-ranking police officer in Hong Kong)
- An opposition movement focusing attention on corruption (e.g., Mexico's two opposition parties campaigning against the ruling PRI)
- An economic crisis (e.g., South Korea's financial market collapse)
- External pressure (e.g., the IMF and World Bank conditionality imposed on Kenya)

Beyond such openings, the assessment needs to ascertain the broad level of support for and opposition to anti-corruption reform. That is, the assessment needs to identify supporters and opponents of reform among the ruling party, the opposition, the bureaucracy, subnational governments, the judiciary, the military, business, labor, civic groups, organized crime, donors, and foreign governments. It is also important to identify motivations and resources for supporting or opposing anti-corruption efforts. Motivations can be political, economic, or moral in nature, while resources can include investment capital, foreign assistance, coercion, votes, policy instruments, and moral authority.

D. Programming Guidance

A strategy to fight corruption must respond to the nature of the problem and the opportunities and constraints for addressing it. As suggested above, the extent of corruption provides the first decision-point in developing a strategy. Where corruption is sporadic, USAID missions' resources should probably best be used on other programming areas. However, where corruption

is pervasive, USAID missions should further evaluate anti-corruption program options.

The degree of opening for reform is the second factor to consider when crafting a strategy. If there is little or no opening for reform, the strategy should concentrate on societal measures to increase awareness of the problem and mobilize political will for fighting corruption.

Examples of societal measures useful when there is little or no opening for reform:

- Supporting critics of corruption
- Fostering anti-corruption networks
- Publicizing procedures and rights
- Conducting service-delivery or corruption-perception surveys
- Communicating the costs of corruption
- Promoting a free press
- Increasing pressure from international organizations, foreign governments, and investors to take the issue seriously

At the same time, USAID missions may be able to support less politically sensitive institutional measures to reduce corruption. Institutional measures to limit the state's authority, such as economic liberalization, privatization, and procurement reform, may fit that criteria as they are often viewed in more technical, apolitical terms. Institutional measures to realign incentives, such as civil service reform, may also be feasible even where there is little or no opening for anti-corruption reform per se. On the other hand, measures to improve accountability are not likely to be supported by a government disinterested in or hostile to reducing corruption.

If, on the other hand, there is partial or significant opening for reform, the strategy should combine societal and institutional measures to combat corruption. Even though support for fighting corruption exists, societal measures are still needed to broaden awareness and institutionalize political will.

Examples of institutional and societal measures useful when there is support for reform:

- Targeting government institutions where the corruption problem is serious and political will for change exists (often derived from a high-level official who identifies his or her tenure with fighting corruption)
- Identifying specific interventions based upon root causes of the problem—wide authority, little accountability, or perverse incentives
- Sponsoring integrity workshops
- Fostering anti-corruption NGOs
- Encouraging anti-corruption advocacy
- Promoting civic monitoring
- Providing training in investigative journalism
- Promoting private sector efforts to prevent corruption
- Advocating international cooperation and conventions

For example, significant corruption in the customs authority and the presence of a reformer at its highest level may direct USAID anti-corruption assistance to that institution. The specific reforms in customs may target personnel systems and ethics codes if perverse incentives are the main problem; transparency and oversight if little accountability is the main problem; or elimination and simplification of tariffs if wide authority is the main problem.

More commonly, the reform of any government institution will incorporate some combination of these measures.

As the foregoing makes clear, there is no silver bullet or singular response to corruption that will work in all circumstances. Just as corruption stems from a variety of institutional failings and societal predispositions, responses to corruption must vary to address particular causes.

Moreover, responses must conform to a politically-constrained reality, adapting to the opportunities and constraints for fighting corruption at a given time. While the mix of interventions will vary, use of societal measures to build and maintain awareness and political will is key to sustaining the effort. Where corruption is pervasive, the fight against it must be a public as well as a technocratic affair.

CAUSES OF AND RESPONSES TO CORRUPTION

Institutional Causes	Institutional Responses
Arbitrary authority	**Limit authority** E.g., privatization, liberalization, competitive procurement, competition in public services
Minimal accountability	Improve accountability through: **Transparency**, e.g., freedom of information legislation, financial disclosure, open budget process, financial management systems **Oversight**, e.g., audit offices, inspectors general/ombudsmen/anti-corruption agency, legislative oversight, hot lines, and whistle-blower protection **Sanctions**, e.g., electoral, criminal, and administrative sanctions, judicial reform
Perverse incentives	**Realign incentives**, e.g., living wage, performance-based incentives, professionalization, ethics codes, eliminating redundant and ghost workers
Societal Causes	**Societal Responses**
Anti-system attitudes	**Raise awareness** about costs of corruption and mobilize political will for reform, e.g., through surveys, public relations campaigns, investigative journalism, civic advocacy organizations, workshops, international pressure

IV. USAID ANTI-CORRUPTION EFFORTS

A. USAID/Washington

In response to new opportunities and interest in working against corruption, USAID/Washington has taken a number of steps to promote Agency anti-corruption efforts. In December 1997, representatives from the Global Bureau (G), the Latin American and Caribbean Bureau (LAC), the Eastern Europe and New Independent States Bureau (ENI), the Asia and Near East Bureau (ANE), the Africa Bureau (AFR), the Bureau for Humanitarian Response (BHR), the General Counsel's Office (GC), and the Inspector General's Office (IG) convened an anti-corruption working group that meets monthly to exchange information and coordinate work. Given the cross-sectoral nature of corruption, both economic growth and democracy-governance officers participate in the group. A subcommittee of the working group is developing policy guidance for Agency anti-corruption activities.

Coordinated through the working group, several bureaus are co-sponsoring anti-corruption workshops with the Organization for Economic Cooperation and Development (OECD). The group aims to broaden discussion of the OECD anti-bribery convention signed in December 1997. The LAC bureau co-sponsored a regional workshop in Argentina in September 1998; the ENI bureau co-sponsored a regional workshop in Turkey in October 1998; and the ANE bureau is co-sponsoring a regional workshop in the Philippines in July 1999. In addition, the Center for Democracy and Governance (G/DG), the Center for Economic Growth (G/EG), and ENI are co-sponsoring an international conference on the role of the private sector in fighting corruption. The conference will be held in Washington, D.C. in February 1999.

G/DG is also supporting anti-corruption efforts through a grant with Transparency International (TI). This grant, initiated in September 1997, provides $2 million for intensive anti-corruption work in nine countries and for regional lessons-learned workshops. The country programs will start with an integrity workshop to help groups diagnose corruption problems and develop action plans to fight them. The grant targets Bulgaria, Ukraine, Bangladesh, Philippines, Benin, Ghana, Mozambique, Colombia, and the Dominican Republic. G/DG is also contracting with the Center for Institutional Reform and the Informal Sector (IRIS) to document four case studies of successful anti-corruption interventions that will feed into the regional workshops organized by TI.

Regional bureaus are also developing anti-corruption initiatives. In 1998, the LAC Bureau initiated an assessment of its Regional Financial Management Improvement Project II, designed to improve governmental accountability and financial management. The bureau plans to issue a follow-on contract in 1999. The LAC project hosts a donor consultative group, publishes a monthly newsletter entitled *Accountability/Anti-corruption*, sponsors regional teleconferences called Respondacon, and provides technical assistance. In December 1997, the ENI Bureau established an anti-corruption working group, developed an anti-corruption strategy for the region, and set aside funds over two years for anti-corruption support. Building on the LAC model, the bureau will use a contractor to establish a donor consultative group, support training workshops, assist assessment and strategy-design exercises, develop a newsletter and other information linkages, and write reports and program materials. Similarly, ANE has set aside money for an anti-corruption strategy.

LAC is also consulting with the Organization of American States (OAS) and the Inter-American Development Bank on follow-up workshops to the Inter-American Convention Against Corruption and the Summit of the Americas.

LAC, USAID/Nicaragua, and USAID/Guatemala also collaborated with the World Bank's Economic Development Institute on a Central America Regional Integrity Workshop held in September 1998. The workshop was designed to yield national action plans to fight corruption, with a special emphasis on harmonizing anti-corruption related statutes in the region. ENI is working with the World Bank on anti-corruption workshops and programs in Georgia and Albania and through the State Department's Coordinator's Office to coordinate anti-corruption efforts in Ukraine and Russia.

B. Field Missions

A number of USAID missions have begun developing anti-corruption programs. Through a G/DG grant to TI, missions in Benin, Ghana, Bangladesh, Philippines, Colombia, Dominican Republic, Bulgaria, and Ukraine are helping establish local TI chapters, funding anti-corruption surveys, and launching integrity workshops. In addition to their work with TI:

- USAID/Bulgaria is funding a coalition of NGOs dedicated to fighting corruption.
- USAID/Ukraine is sponsoring local integrity workshops in two *oblasts* (regional level government), to provide training in investigative journalism, and to support advocacy for public hearings and freedom of information laws.
- USAID/Benin is providing assistance to the Chamber of Accounts of the Supreme Court and the Inspector General's Office of the Ministry of Finance.

Other missions have also begun working in this area:

- USAID/Nicaragua recently conducted a survey of public perceptions of corruption and is carrying out a public education campaign on citizens' rights and responsibilities. It is also supporting local watchdog organizations, and is providing assistance for an integrated financial management system.
- In 1998 USAID/Russia allocated funds toward new programs in judicial ethics and organization; the establishment of a court bailiff service; financial disclosure and government procurement issues; and the development of standardized auditing and accounting procedures.
- USAID/Georgia and USAID/Albania have funded surveys of corruption perceptions and are working with the World Bank to develop anti-corruption programs.
- USAID/Tanzania has supported audit training in the Office of Controller Auditor General and has funded civil society organizations to hold anti-corruption workshops and produce anti-corruption pamphlets for students in secondary schools.
- USAID/Madagascar has sponsored a series of seminars for the Inspector General's Office and the Office of Accounts.
- USAID/Peru has provided support for the modernization of the Controller General's Office.
- USAID/South Africa and USAID/Guatemala have funded work on ethics legislation.
- Missions in El Salvador, Paraguay, and the Central Asian Republics are funding anti-corruption assessments.

C. Indicators

Performance monitoring is a necessary and integral part of good program management. For U.S. government-funded programs, it fulfils the intent of the 1994 *Government Performance and*

Results Act (the Results Act). To this end, performance information is combined with broader trend information within the Agency's goal areas to report results to the Office of Management and Budget, Congress, and the public. Nevertheless, the primary purpose of performance indicators is to assist in making programmatic decisions and learning from past experience.

The following indicators are suggestive. A more comprehensive list of indicators for rule of law, elections, civil society, and governance programming can be found in G/DG's *Handbook of Democracy and Governance Indicators* (PN-ACC-390). Please refer to this document for more details. For ordering information, see back inside cover of this publication.

1. Indicators of Government Performance

- Public perceptions of corruption in the delivery or provision of selected government services, as reported in opinion polls
- Perceptions of corruption by surveys of business persons or firms attempting to do business with the state
- Time and real cost to customers of getting a license from a selected licensing agency or a connection to utilities through a government utilities company

2. Indicators of Anti-Corruption Laws and Regulations

- Establishment of a code of conduct or other legally binding statements for elected and government officials

3. Indicators of Oversight Mechanisms on Maintenance of Ethical Standards

- Maintenance and adequate funding of an independent auditor-general's office or equivalent organization that regularly audits government accounts; an inspector-general's office that regularly monitors government contracting and procurement practices; or an office of government ethics to monitor and implement a code of ethics
- Percent of government budget audited according to required standards in the last financial year and/or percent of government contracts and procurements reviewed by the inspector general's office
- Percent/number of government departments/agencies with audit findings (e.g., that find an error) and/or equivalent for inspections of contracts and procurements
- Percent/number of examples of full investigation of significant breaches of procedures or ethics at relatively high level being pursued fully and fairly to transparent outcome, and if necessary, to enforcement/punishment
- Effectiveness of legislative oversight
- Number of NGOs with specialized capacity to analyze, monitor and publicize government corruption

4. Professionalization of Recruitment and Management

- Percentage of new officers recruited by competitive exam conducted in a "fair" manner
- Number or percent of government financial/accounting systems operating under an integrated financial management system

V. PARTNERS

A. USAID Implementing Mechanisms

G/DG supports Transparency International's program to strengthen public support for anti-corruption programs and enhance transparency and accountability in government through an on-going cooperative agreement. In addition, G/DG has several mechanisms available to assist USAID missions in the design, implementation, and evaluation of anti-corruption activities. The mechanisms are described in detail in *The Center for Democracy and Governance User's Guide*. Briefly, they include (1) the Implementing Policy Change contract with Management Systems International which can be tapped to help public and private organizations manage the development and implementation of new policies, including those related to anti-corruption; and (2) Indefinite Quantities Contracts with Associates in Rural Development, Development Alternatives, and Casals and Associates. The three IQCs, all of which are for general governance-related activities, including anti-corruption work, are scheduled to expire March 31, 1999. It is planned that they will be replaced by two anti-corruption specific IQCs. USAID Global Bureau's Center for Economic Growth has IQCs with the Center for Institutional Reform and the Informal Sector (IRIS) and Associates in Rural Development/Checci, both of which can also be tapped for anti-corruption work.

B. International Organizations

International organizations actively involved in the issue of anti-corruption include the following:

- Organization for Economic Cooperation and Development (OECD)
- The World Bank
- The International Monetary Fund (IMF)
- United Nations
- Organization of American States (OAS)
- Global Coalition for Africa (GCA)
- Council of Europe
- Asia-Pacific Economic Cooperation (APEC)
- Regional Development Banks
- World Trade Organization (WTO)
- International Chamber of Commerce (ICC)

C. Private and Nongovernmental Organizations

Transparency International (TI)—Founded in 1993, TI now has local chapters in over 70 countries. TI builds national, regional, and global coalitions embracing the state, civil society, and the private sector to fight corruption. TI assists in the design and implementation of effective integrity systems and collects, analyzes, and disseminates information to raise public awareness about the damaging impact of corruption. TI has developed a *Source Book on Integrity Systems* and an annual corruption perception index, both available on their web site.

Soros Foundation—The Soros Foundation provides assistance to TI and to local NGOs for anti-corruption work in Eastern Europe and the New Independent States.

The Asia Foundation (TAF)—TAF has a core regional project in anti-corruption, with programs in Korea, Indonesia, Vietnam, Thailand, Bangladesh, and Nepal. It specializes in constituency-building and demand-articulation for anti-corruption reform.

Institutional Reform and the Informal Sector (IRIS)—IRIS organized a training seminar on

anti-corruption in Senegal, documented an anti-corruption mechanism for food aid in Nepal, and researched the effects of weak governance on the ability of West African nations to mobilize resources for basic services.

National Democratic Institute (NDI)—NDI assisted the South African and Turkish parliaments with adopting ethics codes and has held symposiums on ethics and transparency in Paraguay and Southern Africa.

International Republican Institute (IRI)—IRI held national conference in Guatemala to promote ethics and accountability in the political process.

D. Other U.S. Government Offices

Vice President Al Gore and other high level U.S. government officials have undertaken bilateral missions to promote anti-corruption initiatives. In addition to USAID, other U.S. government offices have helped a number of foreign governments establish ethics offices and develop ethics codes, worked with OECD to develop an ethics checklist, participated in technical exchanges with the Chinese government on oversight functions, provided technical assistance to supreme audit institutions in a range of presence countries, broadcast, and/or worked to identify transparency as a theme for President Bill Clinton's trip to Africa in 1998.

They include the following:

- U.S. Office of Government Ethics (OGE)
- State Department's Office of Inspector General
- Department of Commerce
- Department of State
- U.S. Information Agency

E. Web Sites

All of the previously mentioned organizations have updated web sites to facilitate access to information on their work.

The Asian Development Bank
http://www.adb.org

Asia-Pacific Economic Cooperation
http://www.apecsec.org.sg

Council of Europe
http://www.coe.fr/index.asp

Global Coalition for Africa
http://www.gca-cma.org

The Inter-American Development Bank
http://www.iadb.org

International Chamber of Commerce
http://www.iccwbo.org

The International Monetary Fund
http://www.imf.org

The Organization for Economic Cooperation and Development
http://www.oecd.org

Organization of American States
http://www.oas.org

Transparency International
http://www.transparency.de

United Nations
http://www.un.org

U.S. Agency for International Development
http://www.info.usaid.gov

The U.S. Department of Commerce
http://www.ita.doc.gov/legal

The U.S. Information Agency
http://www.usia.gov/topical/econ/bribes

The U.S. Office of Government Ethics
http://www.usoge.gov

The U.S. State Department (Office of Inspector General)
http://www.state.gov/www/dept/oig/index.html

The Vice President's Office
http://www.whitehouse.gov/WH/EOP/OVP/html/Gore_Home.html

The World Bank
http://www.worldbank.org

World Trade Organization
http://www.wto.org

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