



USAID
FROM THE AMERICAN PEOPLE

Anti-Corruption Policy

December 2022



Cover images, clockwise from top left:

Three citizens listen intently to the discussion of the 2019-2020 county budget on Ratego FM in Siaya County, Kenya. Photo by Amunga Eshuchi.

Pro-democracy protest in Belarus. Photo by Jana Shnipelson.

Journalism students of the Hetq Media Factory edit recorded interviews and set up recording equipment. Photo by the Hetq Media Factory

A citizen proudly holds his voter ID card in Peru. Photo by National Office of Electoral Processes.

Participants of a consultation workshop on participatory community governance in Thailand. Photo by USAID Together.

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WELCOME MESSAGE

Corruption has long been a challenge that stymies development, crushes faith in government, and threatens national security. But today, the transnational nature of corruption means the stakes have never been higher, and its reach has never been more global. Authoritarians are weaponizing corruption to manipulate and undermine democracies all around the world. And vulnerabilities in the global financial system are enabling corrupt actors to stash their ill-gotten gains abroad, with the help of facilitators in key industries.

With this internationalization, the impact of corruption on everyday people continues to get worse. Corruption stands in the way of citizens receiving essential services—from health to education—while deterring high-quality private investment. With linkages to trafficking in timber, wildlife, and other natural resources, corruption accelerates deforestation, the loss of biodiversity, and the risks of climate change. Corruption also exacerbates humanitarian emergencies, health crises, and hunger due to the diversion of lifesaving resources. It is a blow to the dignity and rights of women and marginalized groups, who are often preyed upon by corrupt actors. And by undermining the rule of law and legitimacy of democratic institutions and processes, corruption can stoke conflict and add to the appeal of illiberal and autocratic forces.

Yet, corruption also serves as the Achilles' heel of authoritarian regimes. Corrupt officials are more likely to struggle to contain crises and respond to natural disasters, exposing their bankrupt model of governing. In response, citizens are pushing back. Peaceful protests are sweeping through countries to demand an end to public corruption, and voters are turning out in droves to elect new leaders running on anti-corruption platforms. At the same time, citizens, governments, and investigative journalists are building regional and global networks like never before to follow the money, expose wrongdoing, hold the corrupt accountable, and spur reform.

To meet both the challenges and the opportunities of this moment, I am pleased to release the first-ever *USAID Anti-Corruption Policy*. This Policy firmly establishes anti-corruption as an Agency priority, to be confronted head-on. It articulates a new definition of corruption as a system in which the powerful subvert the public good in service of their own personal, economic, and political interests and that of their allies and family members. And, consistent with the U.S. Strategy on Countering Corruption, this Policy solidifies USAID's focus on transnational corruption, grand corruption, and kleptocracy. These forms of corruption normalize and institutionalize the abuse of power, creating a vicious cycle in which officials at all levels act with impunity, and inflict the most damage on development and democratic governance. This shift in focus will allow us to address the underlying causes—not just the visible symptoms—of endemic corruption.

USAID's Anti-Corruption Policy is not merely aspirational. It commits the Agency to a bold array of actions, building on decades of work on this topic. Our flagship *Transforming the Fight Against*

Corruption Initiative will bring together existing programming to tackle corruption and kleptocracy *within* countries as well as *across* borders. Through this work, and in partnership with local, regional, and international actors, we will constrain opportunities for corruption, raise the costs of engaging in it, and incentivize integrity in the public and private sectors. We are also catalyzing new commitments—across a number of sectors—to protect development gains and target corruption from multiple angles. This approach is rooted in deep bipartisan consensus and founded on a recognition that combating corruption abroad enhances the well-being of Americans, safeguards taxpayer funds, advances national security, and creates a more level playing field for U.S. businesses and workers.

This Policy modernizes USAID’s approach to anti-corruption, including through increased programmatic resources, strengthened staff capacity, and the creation of a new Bureau for Democracy, Human Rights, and Governance. We will leverage the full range of USAID capabilities—from our development programming to our policy voice to our reach on public platforms to our convening power with other donors, while collaborating across the interagency. This work will be complemented by a renewed focus on safeguarding development and humanitarian assistance from corruption risk to protect valuable resources from being siphoned off by corrupt actors.

Just as we adapt our approaches to address corruption today, we know the threat will continue to evolve. To keep pace, we are revamping our toolkit to respond to historic windows of opportunity for uprooting kleptocracy, as well as preparing for the backlash that often comes from confronting corrupt networks. Through it all, we invite partnership with local reformers, activists, business leaders, other donors, and all those committed to ensuring that public resources deliver for the public good.



Samantha Power
Administrator, USAID

ACRONYMS

ACTF	Anti-Corruption Task Force
DRG	Democracy, Rights, and Governance
E&L	Evidence and Learning
EITI	Extractive Industries Transparency Initiative
GBV	Gender-Based Violence
GFA	Global Fragility Act
GH	Global Health
ICF	Illicit Capital Flight
IOs	Independent Offices
MEL	Monitoring, Evaluation, and Learning
OGP	Open Government Partnership
OP	Operational Plan
PGII	Partnership for Global Infrastructure and Investment
PIDR	Presidential Initiative for Democratic Renewal
PPR	Performance Plan and Report
PRC	People's Republic of China
RAS	Risk Appetite Statement
TFAC	Transforming the Fight Against Corruption
UNCTAD	United Nations Conference on Trade and Development
USAID	United States Agency for International Development



Community Accountability Facilitators in Cambodia are helping citizens understand the public services they are entitled to. Photo by Heng Leng.

UNDERSTANDING CORRUPTION TODAY AND WHY IT MATTERS

U.S. Commitment to Countering Corruption

For decades, USAID has been a pioneer in the anti-corruption arena. From its 2004 Anti-Corruption Strategy to its 2015 Practitioner’s Guide for Anti-Corruption Programming to its cutting-edge work at the country-level, the Agency has consistently brought thought leadership and development expertise to global efforts to curb corruption.

In 2021, this work received a major boost. Recognizing corruption as a fundamental threat to “economic equity, global anti-poverty and development efforts, and democracy itself,” President Joseph Biden released *National Security Study Memorandum-1* in June 2021, establishing the fight against corruption as a core national security interest. The Memo initiated a review of existing approaches and led, in December 2021, to the release of the first-ever [U.S. Strategy on Countering Corruption](#) (“the U.S. Strategy”).

The U.S. Strategy is groundbreaking in its breadth. It lays out a comprehensive, whole-of-government approach for how the United States will prevent, limit, and respond to corruption and related crimes, domestically and internationally. The U.S. Strategy places special emphasis on the transnational dimensions of corruption, acknowledging the ways in which corrupt actors have exploited legal and regulatory deficiencies in the U.S. and other financial systems to launder their ill-gotten gains. It also confronts how foreign actors have weaponized corruption to undermine sovereign states and advance narrow geopolitical interests, for instance, using covert political donations or other corrupt means to buy influence. The U.S. Strategy identifies new actions to hold perpetrators accountable and strengthen the multilateral architecture to decrease the prevalence of corruption. Finally, the U.S. Strategy

reinforces the importance of foreign assistance as a key lever in preventing and combating corruption, especially when combined with diplomacy.

Across all of these efforts, the U.S. Strategy commits the interagency to consultation and collaboration with a diverse array of partners and continuous assessment and refinement of our approach. This Strategy, building on the United States' longstanding leadership in the global fight against corruption, aims to enshrine anti-corruption as a central plank of our foreign policy and development agenda.

The Five Pillars of the U.S. Strategy on Countering Corruption

- 01 Modernizing, Coordinating, and Resourcing U.S. Government Efforts**
 - Enhance corruption related research, data collection, and analysis
 - Improve information sharing domestically and internationally
 - Increase focus on the transnational dimensions of corruption
 - Organize and resource the fight against corruption
 - Integrate anti-corruption considerations into regional, thematic, and sectoral priorities
- 02 Curbing Illicit Finance**
 - Address deficiencies in the U.S. anti-money laundering regime
 - Work with allies and partners to address governance weaknesses and other deficiencies
- 03 Holding Corrupt Actors Accountable**
 - Continue and enhance our strong enforcement efforts
 - Update the tools available to hold corrupt actors accountable at home and abroad
 - Work with partners to create complementary regimes and amplify our efforts
 - Strengthen foreign partner governments abilities to pursue accountability in a just and equitable manner
 - Bolster the ability of civil society, media, and private sector actors to prevent corruption and push for accountability
- 04 Preserving and Strengthening the Multilateral Anti-Corruption Architecture**
 - Bolster anti-corruption institutions and implementation of existing frameworks
 - Redouble our efforts in multilateral fora
- 05 Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources**
 - Elevate and expand the scale of diplomatic engagement and foreign assistance
 - Protect anti-corruption actors
 - Leverage innovation in the fight against corruption
 - Improve consistency and risk analysis across foreign assistance
 - Improve security assistance and integrate anti-corruption considerations into military planning, analysis, and operations

Defining Corruption

There is no single, widely accepted definition of corruption. Historically, USAID has defined corruption as *the misuse of entrusted authority for personal gain*. Given new global dynamics – including the multiplicity of actors engaged in corruption, their motivations, and the cross-border networks that facilitate their abuses – this definition no longer suffices. For instance, USAID’s prior definition focuses primarily on the behavior of public officials; yet it is clear that corruption often relies on not just elected officials and public-sector employees, but also private-sector entities, financial institutions, service providers, and ordinary citizens. Similarly, the prior definition’s emphasis on personal economic gain belies the increasingly political, strategic, and transnational nature of corruption, including its linkages to domestic actors who seek to retain their hold on power and to foreign actors who seek to co-opt the governing institutions and processes of other countries.

USAID’s New Definition of Corruption

Corruption is the abuse of entrusted power or influence for personal or political gain. Whether corruption is perpetuated by public officials or external actors, its defining characteristic is the exploitation of power and access to subvert the public good in service of narrow personal, economic, or political interests.

As such, this Policy promulgates a new definition of corruption: *the abuse of entrusted power or influence for personal or political gain*. At the heart of this definition is the exploitation of power – both formal and informal – to divert, misappropriate, or capture resources, goods, and access that should be used in service of the public good. This definition recognizes that corruption can take multiple forms, all of which carry significant societal and human costs.

Updating our understanding of corruption requires that we shift our conception of corruption from a purely *country-level* matter to one enmeshed in and exacerbated by *transnational* dynamics. This has considerable implications for USAID’s approach, as outlined in this Policy. While systemic corruption remains a pervasive challenge within countries around the world, it has also metastasized into a global malignancy, beyond the purview of individual countries or communities. A number of factors are at play: corrupt actors have learned how to exploit deficiencies in anti-money laundering systems, as well as in other critical transparency, oversight, business, and tax regimes, to stash the proceeds of their graft in the United States and other financial centers; an industry of professional “enablers” has emerged to help corrupt clients launder their dirty money and reputations; and corruption has converged with transnational criminal networks engaged in trafficking of persons, arms, drugs, conflict minerals, and other illicit goods. Consequently, corruption today amounts to a massive transfer of resources from developing to developed countries.¹

While corruption can take different forms, it is important to note what corruption is not. There are many illegal or undesirable acts with negative social effects that do not meet the definition of corruption. For example, selling narcotics on the street is typically illegal, but unless it is facilitated by a public official for personal or political gain, it is not corruption. Likewise, ineffective and perhaps even negligent public service delivery may result in bad outcomes and may even be driven by bad intentions (bias or apathy), but unless it is due to the exploitation of power for personal or political gain, it is not corruption.

¹ Bullough, Oliver, “The Rise of Kleptocracy: The Dark Side of Globalization,” *Journal of Democracy*, 29, no. 1, 2018, <https://muse.jhu.edu/article/683633>.

Separating corrupt acts from other forms of public mismanagement or even public misfeasance can be complex. Yet, it is necessary in order to identify entry points and adopt approaches that address the heart of the problem.

Forms of Corruption

Corruption takes many forms. The U.S. Strategy defines different types of corruption including:

- *Grand corruption*: when political elites steal large sums of public funds or otherwise abuse power for personal or political advantage.
- *Administrative corruption*: the abuse of entrusted power for private gain—usually by low to mid-level government officials—in interactions with citizens and the private sector, including to skirt official regulations and extort citizens in exchange for basic services.

At its extreme, grand corruption can manifest as:

- *Kleptocracy*: a government controlled by officials who use political power to appropriate the wealth of their nation. Can include state capture.
- *State capture*: when private entities improperly and corruptly influence a country’s decision-making process for their own benefit.

Corruption can occur within countries or transnationally. *Transnational corruption* crosses borders, involves global networks, and employs sophisticated schemes to siphon off the wealth of a country from its rightful owners: the people.^[1] Transnational corruption can include:

- *Strategic corruption*: when a government weaponizes corrupt practices as a tenet of its foreign policy.

^[1]Adapted from previous definitions, including Glenn T. Ware and Gregory P. Noone’s International Affairs Review article, “The Anatomy of Transnational Corruption.”

Corruption’s Impact on Development and Democracy

Corruption directly imperils USAID’s mission of strengthening democratic societies and advancing a free, just, and peaceful world. As Administrator Samantha Power explained in laying out her [vision](#) for USAID in November 2021, corruption is development in reverse: it deepens poverty, deters high-quality private investment, depletes health budgets, diverts lifesaving humanitarian assistance, accelerates environmental devastation and climate change, and robs children of a decent education. Rampant graft fuels public outrage with predatory institutions, aggravating state fragility and enabling armed groups to present themselves as a better alternative to corrupt governments. Corruption can also fund organized crime and armed actors, who then mobilize violence in order to protect their interests.

While corruption inflicts grave damage on political systems and societies, it is also a profound personal injustice. Women, marginalized communities,² and the extreme poor bear the brunt of these harms, as corruption exacerbates unequal power relations and reinforces political, social, and cultural exclusion,

² Marginalized groups may include, but are not limited to persons with disabilities; LGBTQI+ people; displaced persons; migrants; youth; Indigenous Peoples; members of particular religious, racial, and ethnic groups; and people in lower castes.

Sectoral Impacts of Corruption

Corruption diverts resources from investments that could save lives and accelerate locally led development. It also undermines trust in government and fuels crime.



In the **economic growth** sector, 46 percent of companies surveyed in 2022 experienced corruption, fraud, or other economic crimes in the last two years.^[1]



In the **water and sanitation** sector, corruption siphons off almost a third of public resources, equaling annual losses topping \$75 billion.^[2]



In the **health** sector, over 80 percent of people in low income countries have experienced corruption—including requests for informal payments or bribes, ghost workers and absenteeism, referrals made on the basis of personal profit, and counterfeit pharmaceuticals—at an estimated loss of \$500 billion per year.^[3]



In the **environment** sector, corruption facilitates poaching, the illegal timber and fisheries trade, and wildlife trafficking, generating billions in illicit income every year.^[4]



In the **education** sector, governments in Africa with high rates of illicit capital flight (ICF) spend 58% less on education than those with low rates of ICF.^[5]



In the **democracy, human rights, and governance** sector, 98 percent of the 331 murders of human rights defenders in 2020 occurred in countries with high levels of public sector corruption.^[6]



In the **peace and security** sector, police are often perceived to be the most corrupt governmental institution, with over one-third of survey respondents in 34 countries reporting having to pay a bribe to get help from the police or avoid problems.^[7]

For more information about the sectoral impacts of corruption – and entry points to address it – see [USAID's Guide to Countering Corruption Across Sectors](#), available online.

[1] PwC, PwC's Global Economic Crime and Fraud Survey 2022, <https://www.pwc.com/gx/en/forensics/gecsm-2022/pdf/PwC%E2%80%99s-Global-Economic-Crime-and-Fraud-Survey-2022.pdf>.

[2] Transparency International Global Corruption Report 2008; and Corruption in the Water Sector; Water Integrity Global Outlook 2016, available at <http://www.waterintegritynetwork.net/wigo/>.

[3] Transparency International, "The Ignored Pandemic," March 2019, <https://ti-health.org/content/the-ignored-pandemic/>.

[4] UNODC, "World Wildlife Crimes Report, Chapter 8: Value chains and illicit financial flows from the trade in ivory and rhinoceros horn," July 2020, https://www.unodc.org/documents/data-and-analysis/wildlife/2020/WWLC20_Chapter_8_Value_chains.pdf.

[5] UN Africa Renewal, "Africa could gain \$89 billion annually by curbing illicit financial flows," October 2020, <https://www.un.org/africarenewal/web-features/africa-could-gain-89-billion-annually-curbing-illicit-financial-flows>.

[6] Transparency International, "CPI 2021, Highlights and Insights," 2021.

[7] Logan, Carolyn, et al., "Perceptions are bad, reality is worse: Citizens report widespread predation by African police," Afrobarometer Dispatch No. 512, March 2022, <https://www.afrobarometer.org/wp-content/uploads/2022/04/ad512-pap9-citizens-report-widespread-predation-by-african-police-forces-afrobarometer-dispatch-18march22-1.pdf>.

In recent years, corruption has severely eroded the rule of law, as well as citizens' faith in political institutions and processes. From paying off election officials to bribery of policymakers to collusion in public procurement, corruption upends both the *mechanics* of governance and the *outcomes* citizens seek. Against this backdrop, dissatisfaction with democracy, especially among youth, has reached an all-time high.⁸ The prospects for *accountability*, to help overcome these obstacles, are often scuttled by a lack of transparency, corruption in the judiciary, and capture of the media sector. Autocrats' and kleptocrats' abuses of power have become even more brazen, as they learn to combine the old playbook of stealing public funds to pay off would-be dissenters with newer techniques: information warfare to malign anti-corruption champions, technological tools to surveil them, and legal harassment to silence them. Technology cuts both ways, though. While it can be an accelerant of corruption – facilitating transactions through the dark web and cryptocurrencies – it can also be a source of resilience, providing new and innovative solutions to prevent, detect, and respond to corruption.

The threat corruption poses to democratic progress has been further exacerbated by the weaponization of corruption as a means of *foreign* domination. Authoritarians increasingly deploy “strategic corruption” to capture powerful individuals—politicians, judges, and the like—in target countries, buying their loyalty with covert campaign donations, “sweetheart” procurement deals, or other corrupt enticements. By inducing public officials to prioritize corrupt foreign interests above the interests of their own people, strategic corruption shatters the social contract that is meant to bind a government to its citizens.

These trends have undercut development progress. Corruption has substantially contributed to the rise in extreme poverty for the first time in over 20 years⁹ and to 16 consecutive years of global democratic

⁸University of Cambridge Bennett Institute for Public Policy, *Global Satisfaction with Democracy Report, 2020*, https://www.bennettinstitute.cam.ac.uk/wp-content/uploads/2020/12/DemocracyReport2020_nYqqWi0.pdf.

⁹ “The Sustainable Development Goals Report,” United Nations, 2021, <https://unstats.un.org/sdgs/report/2021/The-Sustainable-Development-Goals-Report-2021.pdf>.

Translocal Action Against Kleptocracy

Bringing kleptocrats to justice can be a long, arduous, and uncertain process. In countries where assets are stolen by the powerful, accountability is often lacking and pursuing justice can be dangerous. Against this backdrop, translocal coalitions are finding new avenues for recourse, including working together to gather evidence across borders and pursuing legal action in countries where stolen funds are laundered and spent. In the Biens Mal Acquis case, an international coalition of organizations and activists used strategic litigation to pursue assets acquired on French soil by the leaders of Congo-Brazzaville, Gabon, and Equatorial Guinea. In 2017, Vice President Teodoro Nguema Obiang from Equatorial Guinea was tried and convicted in French courts on charges of diverting corruptly acquired funds into investments on French territory. As a result, French courts confiscated Obiang's \$120 million mansion in Paris, along with \$5.6 million worth of luxury cars. The civil-society organizations engaged in this fight scored another victory in 2021, when the French National Assembly passed asset repatriation legislation that would ensure assets seized in international corruption cases, such as the Biens Mal Acquis trials, would return to the country from which they were stolen. This example powerfully demonstrates what is possible when local civil-society groups, who have critical information necessary for litigation and are most directly affected by kleptocratic rulers, collaborate with international and diaspora groups, who are in a position to support legal processes and media campaigns that highlight how “safe haven” countries are implicated in transnational corruption and kleptocracy. [1]

[1] Alicante, Tutu, “To Catch a Kleptocrat: Lessons Learned from the Biens Mal Acquis Trials in France,” National Endowment for Democracy, <https://www.ned.org/wp-content/uploads/2019/06/To-Catch-A-Kleptocrat.pdf>

decline.¹⁰ Yet, corruption is often the Achilles' heel of authoritarian regimes. In warping government institutions to work for the exclusive benefit of the wealthy and well-connected, corruption inflames popular resentment and mobilizes citizens like few other issues. With this Policy, USAID is confronting these challenges and opportunities with urgency and resolve, durably placing anti-corruption at the top of the Agency's development agenda.

¹⁰ Sarah Repucci and Amy Slipowitz, "Freedom in the World 2021: Democracy Under Siege," Freedom House, 2021, <https://freedomhouse.org/report/freedom-world/2021/democracy-under-siege>.



The USAID-supported Anti-Corruption School in Ukraine empowers young people to combat corruption in their communities, and in the society at large. Photo by USAID.

ADAPTING TO A CHANGED CORRUPTION LANDSCAPE

As described above, corruption has transformed. So must we. This Policy represents both an elevation and reorientation of USAID’s anti-corruption efforts. It updates the types of corruption the Agency will emphasize, the outcomes we will pursue, and the tools and capabilities we will bring to bear on this problem set.

Emphasizing the Most Pernicious Forms of Corruption

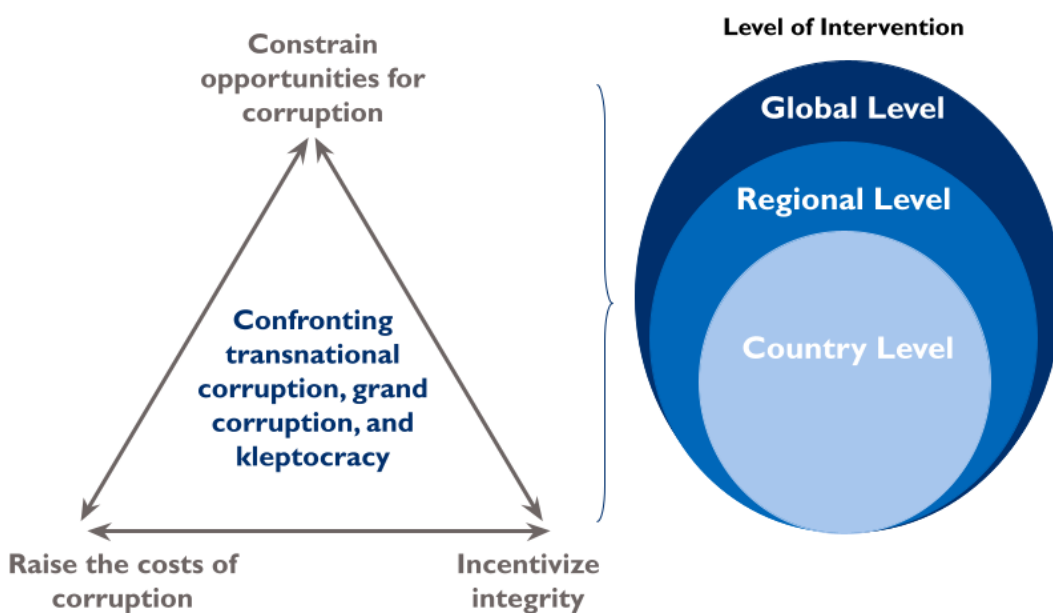
Given the drivers and manifestations of corruption today and the perils facing global development and democracy, USAID will enhance its focus on **transnational corruption, grand corruption, and kleptocracy**. USAID will take particular aim at corruption that is undermining the functioning or legitimacy of democracy, such as high-profile grand corruption and electoral corruption, and prioritize the types of large-scale and high-level corruption that most profoundly limit development progress. Emphasizing these forms of corruption does not mean abandoning USAID’s efforts to expose, prevent, and mitigate administrative corruption. This work – which is especially valuable for women and marginalized communities who face daily injustices and indignities at the hands of corrupt officials – should continue where countering administrative corruption is prioritized by local actors and is necessary to achieve USAID’s mission. However, this new emphasis does mean focusing on the underlying *systems and networks* that allow elites to pillage public funds and consolidate their power rather than *individual acts of greed*, often perpetrated by low-level officials. By targeting transnational corruption, grand corruption, and kleptocracy, this Policy strives to blunt the most severe impacts of corruption and break the cycle of abuse that empowers officials at all levels to act with impunity.

Establishing Objectives to Guide USAID’s Work

With these contemporary corruption threats in focus, USAID’s anti-corruption work will revolve around **protecting resources crucial for development and delivering on the promise of democracy as a system that works in the public interest**. Our interventions at the global, regional, and country¹¹ levels will advance this goal by pursuing three mutually reinforcing objectives, working with a wide range of governmental and nongovernmental actors and institutions:

- **Constrain opportunities:** USAID will support activities that reduce opportunities for those with entrusted power to engage in corrupt behavior, launder the proceeds of their crimes, and enjoy their ill-gotten gains by addressing legal and procedural deficiencies; strengthening disclosure requirements for public officials and political candidates; digitizing government services; introducing open procurement systems; and improving fiscal transparency.
- **Raise the costs:** USAID will support activities that impose consequences on corrupt actors – both as a means of accountability and as a deterrent – and increase the stakes of government inaction by bolstering exposure of corruption, supporting advocacy and coalition-building, boosting oversight bodies and functions, and improving investigation and enforcement capacities.
- **Incentivize integrity:** USAID will support activities that create positive inducements for controlling corruption and improving governance in the public and private sectors by publicly recognizing integrity and cultivating a race-to-the-top in high-risk industries, promoting adherence to global norms and standards, and driving investment toward environments experiencing historic anti-corruption openings.

Transforming the Fight Against Corruption: USAID’s Approach



¹¹ USAID’s work at the country level includes national-level interventions as well as sub-national activities.

To advance these objectives and catalyze new programs and partnerships across all sectors, USAID is launching the *Transforming the Fight Against Corruption* (TFAC) Initiative. TFAC will combine regional and global programs USAID announced at the first Summit for Democracy with our scaled up and revamped anti-corruption work to **block** corrupt actors from siphoning off their nation’s wealth and **shield** partner countries from corrupt internal and foreign influence. TFAC will unify and amplify the Agency’s anti-corruption efforts in order to protect resources from diversion and build governments’ resilience to corruption and co-optation. The Initiative will consolidate the Agency’s wide-ranging anti-corruption activities and enable us to better track what we are doing, tell our story, and learn from our successes, as well as our failures.

Modernizing USAID’s Approaches

Transforming the systems and disrupting the networks that sustain modern corruption will require USAID to update its toolkit. With a presence in over 100 countries, USAID’s comparative advantage is our ability to counter corruption in a way that is **locally rooted and globally connected**. For decades, USAID has engaged in the fight against corruption by strengthening the effectiveness, independence, and accountability of public-sector institutions, especially specialized oversight bodies and justice sector institutions. We have provided significant support to civil-society groups and journalists leading investigations against corruption and calling for an end to impunity for corrupt acts. And we have partnered with private-sector allies, reformers in government, and members of parliament to improve the business-enabling environment in order to attract high-quality investment and promote economic growth. These interventions are critical and must continue – and in fact, be expanded. Yet, USAID will

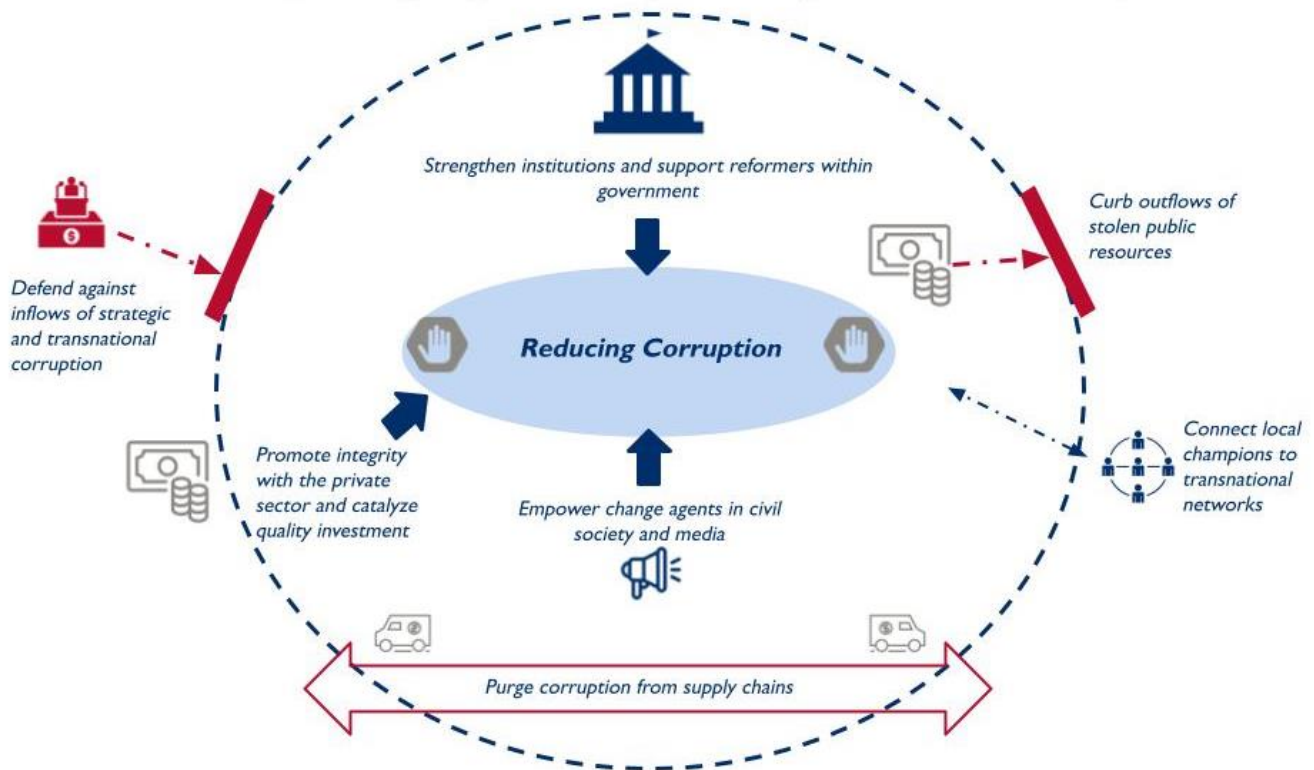
Modernizing USAID’s Approaches



not be able to counter corruption effectively at the scope and scale required if we only tackle the factors contained within a country’s boundaries. Success in the fight against corruption necessitates a response as global, nimble, and networked as corruption itself.

As such, as outlined in the chart on page 17, this Policy calls on USAID to shift its approaches in order to address the transnational dynamics that are driving and exacerbating corruption. USAID should *seek out opportunities* to augment and adapt existing efforts focused on addressing corruption *within* a nation’s boundaries to also counter corruption that *cuts across borders*. Because global corrupt actors exploit country-level weaknesses, there are approaches USAID has used to combat corruption domestically that can be modified to target transnational corruption. Similarly, strategies currently targeted toward administrative corruption can be revamped to target grand corruption and kleptocracy.

Transforming the Fight Against Corruption: Entry Points at the Country Level



The graph above is a visual representation of entry points at the country level to address transnational corruption. As illustrated here, USAID has a number of opportunities in-country to block corrupt actors from siphoning off their nation’s wealth and shield partner countries from corrupt internal and foreign influence, working with government institutions and reformers, civil society and media, the private sector, and transnational networks.

Throughout our efforts, USAID will look beyond technical or institutional fixes and consider the attitudes, beliefs, societal fragmentation, and norms that perpetuate corruption, within countries and transnationally. For instance, nascent research reveals how social norms in organizations and communities – especially a desire to belong – may encourage individuals to act in ways that are contrary

to their own belief systems and interests.¹² Thus, as we strengthen institutions, policies, laws, procedures, and other means of curtailing corrupt behavior, USAID will also address the formal and informal incentives molding individuals’ and groups’ actions.

Applying a Progress Beyond Programs Mindset

Thoughtfully designed and executed programming has, and will remain, the bedrock of USAID’s work. However, USAID knows that programs alone will not solve a problem as vast, pernicious, and intractable as corruption. To drive meaningful and durable change, we must use all of the tools at our disposal, in partnership with other U.S. departments and agencies and other stakeholders. In that spirit, this Policy applies a “progress beyond programs” mindset to USAID’s anti-corruption efforts. This includes maximizing our policy voice, our strategic communication platforms, and our convening power to support reforms that increase government transparency, accountability, and responsiveness and show solidarity with the actors who are driving change. Building resilience to mis-, dis-, and malinformation will be critical to ensuring that anti-corruption champions are able to withstand attacks aimed at distorting and discrediting their efforts.

The Agency will achieve this holistic vision by elevating and embedding anti-corruption throughout the Program Cycle, USAID’s operational model for planning, delivering, assessing, and adapting development programming in a given region or country. Missions, Bureaus, and Independent Offices (IOs) are expected to prioritize anti-corruption efforts – especially those focused on tackling transnational corruption, grand corruption, and kleptocracy – and affirmatively seek to mitigate corruption risks. USAID Operating Units should align their strategies, policies, programs, and practices with the goal and objectives set out in this Policy and embodied in the TFAC initiative, while customizing their tactics and messaging to suit the operating environment.

OPTIONS FOR USAID ANTI-CORRUPTION ENGAGEMENT		
<p>Constraining Opportunities</p> <ul style="list-style-type: none"> Digitize government services Institute open procurement systems Strengthen disclosure requirements for public officials and candidates Improve fiscal transparency 	<p>Raising the Costs</p> <ul style="list-style-type: none"> Bolster investigative journalists’ abilities to expose corruption Support cross-border coalition-building and advocacy Improve investigation and enforcement capacities Boost oversight bodies and functions 	<p>Incentivizing Integrity</p> <ul style="list-style-type: none"> Celebrate officials with a track record of integrity Spur collective action against bribery in high-risk sectors Promote adherence to global norms and standards Drive investment toward environments with historic anti-corruption openings

¹² Social norms are the mutual expectations held by members of a group about the right way to behave in a particular situation. For more, see Scharbatke-Church, C. and Chigas, D., “Understanding Social Norms: A reference guide for policy and practice,” Leir Institute, Tufts University, September 2019, https://www.corruptionjusticeandlegitimacy.org/_files/ugd/0379c5_f6f60113cb70443daf96b83b4cf47f27.pdf.

Opportunities to address corruption exist everywhere that USAID works. Where political will is high, our assistance is likely to go farthest. However, in environments with low political will, supporting anti-corruption is still viable with willing counterparts in specific ministries or municipalities; with civil-society organizations and journalists; or via less politically sensitive interventions such as expanding transparency and cutting red tape. The key is to identify entry points that are tailored to the context, based on in-depth analysis, and responsive to local demands and preferences.

Implications of this Policy

This Policy calls on USAID Operating Units, especially Missions, to durably elevate anti-corruption and seize opportunities to counter corruption across their portfolios by:



Aligning global, regional, country, and thematic strategies and policies to reflect the prioritization of anti-corruption and new directions established in this Policy.



Expanding and adapting programming at all levels to address transnational and strategic corruption and kleptocracy.



Integrating anti-corruption considerations and practices across USAID's development and humanitarian assistance work.



Leveraging USAID's policy voice and convening power to catalyze reform and lift up anti-corruption champions.



Developing new plans, tools, funding, and mechanisms to respond more nimbly to anti-corruption openings and setbacks.



Conducting regular and nuanced analysis to identify opportunities to transform corruption dynamics and support reformers, as well as to spot threats.



Forging new partnerships and coalitions to spur and sustain anti-corruption progress.



Enhancing collaboration and information sharing with the interagency to bring the entire U.S. government's capabilities to bear on the corruption problem set.



Devoting time, attention, resources, and staff to enshrine a focus on anti-corruption throughout USAID.



Safeguarding against the strategic risk that foreign assistance could indirectly fuel corruption.



In an environment of free speech and sisterhood, more than 300 women gathered to demand inclusive and equitable development in the regions of Bajo Cauca, Antioquia Department, Colombia on International Day for Women's Rights on March 25, 2022. Photo by Andrés Palacio.

MOBILIZING FOR IMPACT: USAID'S LINES OF EFFORT

This section captures what the U.S. government's elevation of anti-corruption means for USAID in concrete terms: the specific *priorities* we will pursue, the *actions* we will take, and how we will hold ourselves *accountable*. It "brings to life" the objectives and shifts discussed above and is organized around six lines of effort:

- (1) *expanding USAID's efforts to address contemporary corruption threats* to keep pace with the drivers, enablers, and manifestations of corruption today, especially transnational corruption;
- (2) *exercising holistic and responsive leadership* to marshal USAID's range of capabilities during pivotal moments for anti-corruption reform and backsliding;
- (3) *countering corruption across sectors* to thwart corruption that impedes development progress and tackle corruption from multiple angles;
- (4) *forging new partnerships and coalitions* to spur and sustain anti-corruption progress;
- (5) *institutionalizing anti-corruption as a priority* across the U.S. government and USAID's strategy, policy, and planning processes and frameworks; and
- (6) *safeguarding development and humanitarian assistance from corruption risk* to preserve public resources for development, protect foreign assistance from diversion, and avoid unintended consequences of international aid.

The commitments below were developed in close collaboration with stakeholders across the Agency and reflect the latest research and practice. Our hope is that sharing these plans publicly will invite exchange and partnership with outside stakeholders, as we collectively wrestle with the global scourge of corruption. The priorities below reflect a three-year time horizon: a down payment on what is intended to be robust implementation of this Policy for many years to come.

Evidence-Based Programming

USAID held its first-ever Anti-Corruption Evidence and Learning Week (E&L Week) in January 2022. Anti-corruption experts and practitioners from the U.S. government, academia, think tanks, and civil society came together to discuss the evidence base on anti-corruption, share sectoral learning, and identify knowledge gaps. This Policy reflects the key lessons and takeaways from E&L Week, which include:

- Whole of U.S. government collaboration and information sharing is critical to advancing the U.S. Strategy on Countering Corruption and curbing transnational corruption.
- In-depth context analysis is essential for identifying entry points and prioritizing anti-corruption interventions. Anti-corruption programs should use tools like political economy analysis frameworks and learning questions to understand the political dynamics and incentives within countries and sectors.
- Informal movements and coalitions, especially with local actors in the lead, are often the most effective change agents.
- Recent research points to the effectiveness of combining top-down corruption auditing and bottom-up social accountability practices, along with sanctions for wrongdoing and promotion of positive incentives.
- Emerging evidence highlights the influence of social norms on corruption and the need to shift cultures within institutions to affect lasting reform.
- Transnational corruption has significant connections with transnational organized crime and is pervasive in key sectors (e.g., extractives); beneficial ownership standards and other transparency measures can help.
- Responding rapidly and decisively – using a variety of tools and approaches – when reform windows open is vital for delivering on the promise of change and sustaining the window.



Expanding USAID's Efforts to Address Contemporary Corruption Threats

USAID will broaden the scale and scope of its assistance to better tackle transnational corruption, at the country level, regionally, and globally. USAID will place particular emphasis on addressing the weaponization of corruption by authoritarian regimes – a form of transnational corruption that has a particularly devastating impact on sovereignty, democratic governance, and sustainable development.

Planned Actions

- **Activating innovative programming to counter transnational corruption:** USAID announced a bold suite of programs at the Summit for Democracy, under the umbrella of the Presidential Initiative for Democratic Renewal (PIDR) to address the different dimensions of transnational corruption. In furtherance of this Policy and as part of the TFAC initiative, USAID will deliver on these programmatic commitments:
 - The *Empowering Anti-Corruption Change Agents Program* will support civil society and media leaders in building the capacity and coalitions they need to demand change and engage in collective action. The program will enhance protection for whistleblowers, civil-society watchdogs, journalists, and others at risk for their work on corruption. Through the new insurance mechanism Reporters Shield, USAID will support liability

coverage to help defend journalists and their organizations from defamation claims and allow them to continue their critical work;

- The *Countering Transnational Corruption Grand Challenge* will build coalitions and source novel solutions to curb the threat of transnational corruption in four main areas: illicit finance, trafficking of high-value commodities, global supply chains, and public and private integrity;
 - The *Global Accountability Program* will surge support to partner countries to prevent, detect, and mitigate corruption and build regional networks to take joint action against transnational corruption, kleptocracy, illicit finance, money laundering, and strategic corruption; and
 - *The Anti-Corruption Response Fund* will allow the Agency to identify and experiment with innovative anti-corruption approaches, support locally led change, and mobilize in response to either windows of opportunity or situations of increased risk for corruption.
- **Countering strategic corruption:** Corruption is a critical tool that external actors, particularly the People’s Republic of China (PRC) and the Russian Federation, use to gain influence over government institutions and markets, including by coaxing corrupt officials to take on disastrous debts (of dubious public benefit), which cement foreign influence over the long term. Other autocracies are increasingly engaging in these corrupt tactics as part of their foreign policy. USAID will address this growing threat in creative ways, in partnership with the interagency.
 - **PRC:** As part of our affirmative development agenda, USAID seeks to create alternatives to PRC “gray zone” approaches and investment models that exacerbate corruption, exploit natural resources, contribute to debt dependency, threaten host-country businesses, and may not meet country development needs. USAID will incorporate anti-corruption into each pillar of our approach to the PRC, and an Analytical Brief will synthesize for USAID practitioners the linkages between PRC finance and corrupt activity. In addition, we will pay new attention to anti-corruption in the context of the Partnership for Global Infrastructure and Investment (PGII), including seeking alignment, where relevant, with Blue Dot Network¹³ standards for transparent and accountable investment. We will emphasize this new way of doing business in outreach to public audiences, including trusted local partners, to address PRC disinformation and build resilience to strategic corruption. We will also seek to leverage implementation of the Indo-Pacific Strategy, including the Indo-Pacific Economic Framework for Prosperity, which includes a dedicated chapter on Anti-Corruption and Tax, as a means of facilitating peer learning and incentivizing high standards.

Examples of Regional Commitments

USAID will foster ties between government reformers and expand strategic communications assistance in Europe and Eurasia. In the Middle East, USAID will assist with the development and implementation of national anti-corruption plans and accelerate public financial management reform. In Latin America and Asia, USAID will bolster regional civil society and media networks to track illicit finance. And in Sub-Saharan Africa, USAID will commission new research to inform a robust response to transnational and strategic corruption and kleptocracy.

¹³ “Blue Dot Network,” U.S. Department of State, <https://www.state.gov/blue-dot-network/>.

- **Russian Federation:** USAID will encourage Missions in countries facing the brunt of the Kremlin’s strategic corruption to integrate this topic in their Country Development Cooperation Strategies or Strategic Frameworks, as USAID’s Mission in Ukraine has done. Execution of these strategies can be informed by the recently released USAID Dekleptification Guide, which collates lessons from countries that have confronted strategic corruption deployed by the Russian government and others. More broadly, as part of USAID’s Countering Malign Kremlin Influence work, USAID will confront the Kremlin’s instrumentalization of corruption by expanding our support for procurement transparency and digitalization, investigative journalism, and the resilience and communications capacity of civil society. USAID will also expand its support to the region through the European Democratic Resilience Initiative, with a focus on strengthening frontline anti-corruption bodies’ and actors’ abilities to detect and deflect Kremlin-led strategic corruption. In addition, as part of the U.S. Government Strategy for Central Asia, USAID supports citizen-centered governance, independent media, rule of law, and other efforts to increase the resilience of Central Asian countries to corrupt influences, including those directed from the Kremlin.

2

Exercising Holistic and Responsive Leadership

USAID will exert policy leadership and embrace agility and adaptation to respond decisively to fleeting windows of opportunity for reform – as well as backsliding. To help anti-corruption champions deliver on their promises and sustain windows of opportunity, USAID will mobilize resources, technical expertise, political support, strategic communications, and other forms of assistance from across the U.S. government and donor community, with an eye toward strengthening the entire accountability ecosystem.¹⁴ In situations where anti-corruption reforms are stalling or being reversed, USAID will mount a diplomatic and programmatic response, drawing in our partners from the interagency, civil society, philanthropic community, and multilateral organizations, and grounded in the communities most impacted. Our development diplomacy and other responses will be rooted in cutting-edge research and innovation and will adapt to the context as needed. We will seek to expand our ability to respond on two time horizons – more rapidly, for environments that demand agility, and more continuously, for environments that require longer-term investments

- **Establishing a concept of operations for anti-corruption response:** USAID will improve how it mobilizes to support fast-moving anti-corruption openings and/or backsliding situations. Through the creation of a concept of operations for anti-corruption response, the Agency will be better positioned to launch a decisive, networked, and nimble response that we can scale to meet changing contexts and needs when an “anti-corruption moment” arrives. The concept will emphasize the importance of:
 - conducting or synthesizing in-depth analysis of corruption dynamics and networks and an understanding of local norms and contexts;
 - identifying opportunities to combat corruption, including by leveraging USAID’s political influence, public platforms, and convening power;
 - unlocking and aligning resources within the U.S. government and USAID to surge support to frontline actors at all stages of response – which includes laying the

¹⁴ See work by Jonathan Fox and <https://accountabilityresearch.org/accountability-ecosystems-the-evolution-of-a-keyword/>.

groundwork before a window opens, ensuring a timely response when the moment arrives, and pivoting quickly when it starts to close;

- ensuring USAID adapts to changing conditions and is positioned to support civil-society advocates, investigative journalists, policy reformers, and accountability institutions;
- supporting capacity building and knowledge transfer among frontline civil-society organizations across countries; and
- connecting local needs to flexible resources, support, and engagement from other bilateral donors, foundations, and the private sector.

To operationalize this new approach, we will:

- bring to scale USAID’s Anti-Corruption Response Fund, designed to support countries experiencing a reform opening, backsliding, or an opportunity for experimentation;
 - widely disseminate and support application of USAID’s new [Dekleptification Guide](#) on seizing windows of opportunity for uprooting entrenched corruption – including through targeted engagement and donor coordination in countries experiencing a dekleptification opening;
 - expand USAID’s ability to program new funding quickly; and
 - surge programmatic and staffing support to Missions experiencing a historic opening for anti-corruption reform.
- **Sharpening and regularizing political analysis:** To respond effectively and agilely to new corruption threats and reform opportunities, it is imperative for USAID staff and units to maintain a fresh and detailed understanding of corruption dynamics, networks, and actors, both locally and transnationally. Analysis will include anticipating short-term destabilizing effects of dismantling corrupt structures and identify mitigation measures, if needed. A number of resources exist to aid in this analysis, such as a “screening tool” included in USAID’s Anti-Corruption Program Cycle Guide (forthcoming); an integrated schema and methodology to conduct anti-corruption assessments found in USAID’s [Anti-corruption Assessment Handbook](#); an analytical approach that elucidates why actors behave the way they do as reflected in [Thinking and Working Politically \(TWP\) through Applied PEA: A Guide for Practitioners](#); and external analyses, particularly those developed by local researchers. Nuanced analysis is *always* critical for effective anti-corruption work; it is especially important when windows of opportunity open for dekleptification, including to consider any potential unintended consequences of reform efforts (i.e., on marginalized groups).
 - **Deepening policy engagement:** USAID will use its policy voice in the interagency to highlight anti-corruption as a foreign policy imperative and exercise thought leadership in crafting anti-corruption strategies. This engagement will be informed by USAID’s long-term understanding of the political and social dynamics that fuel corruption. In dekleptification windows of opportunity, we will align programming with diplomacy, informed by past lessons learned. In environments in which anti-corruption champions are threatened, we will advocate for protection measures and the strategic use of sanctions, as relevant.
 - **Enhancing strategic communications for anti-corruption impact:** USAID will craft anti-corruption messages and products that staff across the Agency can use to lend solidarity to reformers, spur anti-corruption progress, and relay the vision and commitments embedded in this Policy. We will encourage USAID Missions and Agency communicators to tailor these messages so that they are solutions-oriented, evidence-based (including to do no harm), align

with local priorities, and resonate with key audiences. In fast-moving environments, we will leverage our public platforms to lift up reformers, sideline spoilers, and galvanize public support for sustained anti-corruption reform.

- **Advancing cutting-edge research and innovation:** USAID will work across Operating Units, including Missions, to improve access to and operationalization of research, evidence, and data on corruption to inform experimentation, programmatic expansion and pivots, policy engagement, analytic work, and resources allocation. For example, USAID’s *State of Innovation Analysis on Countering Transnational Corruption* provides an overview of innovative approaches that USAID Missions can leverage. Being on the cutting edge includes fostering Mission-to-Mission peer learning and implementing an analytic research agenda that addresses emerging priority topics. Initial topics include: applying social norms and behavioral change insights to anti-corruption, opportunities for impact in environments of low political will, addressing corruption in the COVID-19 response, gray-zone challenges in Asia, and responses to the challenges posed by transnational and strategic corruption and kleptocracy in Sub-Saharan Africa. In addition, USAID will support the integration of economic analysis and behavioral economic approaches into programming, building staff capacity to identify the drivers of corruption, the ways in which corruption might enable government functions in a particular context, and potential responses. USAID will also exchange learning from research and innovation efforts with other U.S. government agencies, foreign government partners, and nongovernmental partners.

3

Countering Corruption Across Sectors

USAID will integrate anti-corruption approaches and considerations across our assistance portfolio in order to improve sectoral outcomes and counter corruption from multiple angles. USAID will also rally other donors to incentivize anti-corruption reforms and make game-changing investments in transforming the country systems required for partner governments to lead development across key sectors with integrity, transparency, and accountability. Confronting corruption may involve navigating entrenched patronage systems, which requires sensitivity to conflict dynamics and preparation for potential backlash from those who are fighting to retain or gain income and power. We remain aware of potential risks to the populations we serve and our partners – especially those in sectors that have not traditionally focused on anti-corruption work – and, as such, are committed to understanding these dynamics and building conflict sensitivity and multifaceted protection mechanisms into our engagements.

Planned Actions

- **Identifying and acting on cross-sectoral opportunities:** Building on successful experiences with integrated programming, USAID will identify points of entry for anti-corruption activities, such as addressing corruption risks in procurement across sectors¹⁵ or the promotion of open government and social accountability approaches to public service delivery. We will also support the integration of anti-corruption across USAID sectoral and regional strategies. To support

¹⁵ An OECD study found that 57 percent of bribes are paid to obtain public procurement contracts. “Scale of international bribery laid bare by new OECD report,” OECD, 2014, <https://www.oecd.org/newsroom/scale-of-international-bribery-laid-bare-by-new-oecd-report.htm>.

these efforts, USAID is developing a suite of new resources and tools to support Missions, Bureaus, and IOs in identifying and acting on integration opportunities. This includes the recent [Guide to Countering Corruption Across Sectors](#) as well as targeted Anti-Corruption Integration Handbooks for [Global Health](#); Water and Sanitation; Economic Growth; Democracy, Human Rights, and Governance; Climate and Energy, and Environment sectors, among others. USAID’s Anti-Corruption Task Force (ACTF) will disseminate these products broadly across the Agency, and supplement the guidance with technical support to Missions and staff seeking to deepen integration at the programmatic level.

Energy Transparency

Power Africa, coordinated by USAID, commits to supporting transparent procurement practices for energy projects in Sub-Saharan Africa, both via technical assistance to governments and direct support as part of negotiations with the private sector.

- **Advancing cross-sectoral anti-corruption progress:** USAID Bureaus, IOs, and Missions will take affirmative steps to deepen work on grand corruption and kleptocracy, as well as transnational corruption, in furtherance of this Policy. Notable examples include:



A member of the Turtle Survival Alliance holds a turtle in Ifaty, Madagascar. Photo by Malalatiانا Ramarohetra, USAID.

Climate, Energy, and the Natural Environment: USAID will safeguard against corruption risk in climate finance by promoting high standards of transparency and oversight for both public and private financing. USAID will also continue strengthening energy transparency and promoting implementation of the Extractive Industries Transparency Initiative (EITI) standard to contribute to reduced corruption in the extractives and energy sector, with a particular focus on impacted marginalized communities such as Indigenous Peoples. Additionally, USAID will continue its work to target natural resource corruption and promote legal and responsible sourcing of natural resources – with an emphasis on reducing illegal logging and illegal, unreported, and unregulated fishing, and combating wildlife trafficking – as well as an expanded focus on reducing corruption in the supply chain of green-energy minerals.

Humanitarian Assistance: USAID will strengthen the capacity of national emergency response institutions and National Disaster Management Authorities to react to sudden crises in a manner that is more transparent and accountable to affected populations and underserved communities. In addition, we will better safeguard humanitarian assistance by:

- Engaging with multilateral institutions to promote internal transparency, accountability, and anti-corruption standards
- Coordinating across U.S. government humanitarian and disaster recovery agencies to enhance learning on anti-corruption best practices
- Identifying areas for digital modernization in supply chain management and logistics procedures, both for USAID and our partners, to allow for greater transparency and accountability in the distribution of humanitarian resources
- Continuing to enhance internal controls and risk-mitigation measures, building on our robust suite of compliance tools for humanitarian assistance in nonpermissive environments.



Ventilators provided by the U.S. Government are packaged prior to being shipped to El Salvador to assist the country with their ongoing COVID-19 response. Photo by USAID.



Jordan COVID-19 testing lab. Photo by USAID/Jordan.

Global Health: USAID has established an intra-bureau anti-corruption working group in the Global Health (GH) Bureau to advance evidence-based approaches to promoting good governance, transparency, and accountability and to reducing the impact of corruption in the health sector. Given USAID's significant investments in health commodities and the potential impact of corruption, we plan to expand our emphasis on risk management and efforts to increase transparency and accountability, particularly through GH's NextGEN suite of redesigned supply chain contracts with increased Mission participation in risk surveys for analytics and assessments. GH will also advance efforts to reduce corruption in the health sector through improvements to public financial management, strengthening the health workforce, and strengthening health systems. USAID will promote and disseminate technical guidance and tools for addressing corruption across these areas.

Through these increasingly integrated, targeted, and deliberate interventions, GH will support Missions in reducing corruption where it has the greatest impact, including working with select Missions to develop country-level plans for combatting the risk of supply chain–related corruption. Furthermore, USAID will expand multilateral engagement on the need to better address corruption in the health sector through new partnerships with key international public organizations such as the World Health Organization. These partnerships will increase collaboration – facilitating the exchange of best practices on the ground to reduce corruption – and leverage complementary programs and activities across organizations.



The USAID-supported PREVI program, which aims to prevent and reduce violence, accompanies a neighborhood meeting held in Sector 13, in Morelia, Michoacán, Mexico. Photo by USAID.

Peace and Security: USAID’s Center for Conflict and Violence Prevention will utilize its new Violence and Conflict Assessment Framework to ensure the meaningful analysis of corruption risk in countries affected by conflict and violence. Drawing from that analysis, USAID will advance conflict-sensitivity¹⁶ across its anti-corruption work, especially in places with a history of armed conflict, including a “do no harm”¹⁷ approach to protect local populations and mitigate the risk that assistance could bolster corrupt actors locally.¹⁸ USAID will also integrate corruption considerations into implementation of the Global Fragility Act (GFA) – including analyzing and identifying opportunities to advance transparency and accountability for all GFA countries and incorporating anti-corruption into corresponding implementation plans where appropriate. We will also bring USAID analysis and expertise to the implementation – led by the Departments of State and Defense – of the security sector assistance commitments in the U.S. Strategy on Countering Corruption.

¹⁶ Conflict sensitivity: The practice of understanding how aid interacts with conflict in a particular context, to mitigate unintended negative effects and to influence conflict positively wherever possible, through humanitarian, development and/or peacebuilding interventions.

¹⁷ Do No Harm: The practice of understanding how aid interacts with conflict in a particular context, to mitigate unintended negative effects.

¹⁸ “Responsible Development: A Note on Conflict Sensitivity from USAID’s Center for Conflict and Violence Prevention,” USAID, 2020, https://pdf.usaid.gov/pdf_docs/PA00XCZ1.pdf.

Gender Equity and Equality: We will integrate considerations of the corruption/gender nexus into USAID’s program cycle, including as part of guidance for Agency gender analyses. As part of this process, USAID will develop a resource of anti-corruption programming ideas that would equip Bureaus and Missions to meet USAID’s Gender Integration requirements. This could include work on understanding and disrupting the links between illicit finance and anti-gender equality movements, accelerating political finance reform, increasing women’s meaningful participation in peace and political processes, building the capacity of women leaders to advocate for open governance, and



Somali women living in El Waq decide and plan the future of their district. Photo by Mohamed Abdullah Adan, PACT

deepening understanding of the connection between corruption and gender inequality. In addition, the impact of corruption on women’s meaningful political participation will be assessed in ten focus countries and findings incorporated into activity design. USAID will also review existing portfolios to identify where gender-based violence (GBV) and anti-corruption programming are concentrated in the same geographies or targeting overlapping populations, and we will explore new ways to address corruption as a driver of GBV and impunity. Through the implementation of the Women, Peace, and Security Act, the Agency will support policies and activities that examine corruption as it undermines the equity and equality of women and adolescent girls in areas of conflict and crisis, including in some of the ten countries referenced above.



Pride month celebrations in Georgia. Photo by Mikheil Meparishvili, Equality Movement.

LGBTQI+ Inclusive Development: USAID will support LGBTQI+ civil-society organizations in contending with the disproportionate impact that corruption has on the ability of LGBTQI+ communities to access basic services, and assist them to use anti-corruption mechanisms as a growing part of their advocacy toolbox. USAID will also support Missions to integrate LGBTQI+ equities and considerations into existing and/or planned activities across a broad range of sectors, including anti-corruption. This includes, for example, developing and circulating an internal fact-

sheet and resource guide on corruption and LGBTQI+ inclusive development. USAID will also encourage Missions to undertake consultations and briefings on the impact of corruption with local LGBTQI+ groups, where appropriate.

Democracy, Rights, and Governance (DRG): USAID will pursue a number of opportunities to advance anti-corruption objectives through DRG programming, including through new PIDR activities.

- USAID will improve electoral integrity and counter corruption in politics by supporting legal and regulatory reforms aimed at increasing transparency and accountability in political finance; building the capacity of enforcement bodies, the judiciary, and political parties to improve compliance with political finance rules; supporting independent monitoring of campaign finance and disclosure requirements; strengthening advocacy for greater political finance and electoral transparency; and supporting global and regional commitments that reduce the potential for political corruption.



Young woman in Iraq votes for the first time in May, 2018. Photo by Jim Huylebroek for Creative Associates



Margaret Simon Gatluak, a community correspondent (at left) in Bentiu, South Sudan, interviews women leaders from the Protection of Civilians on International Women's Day 2019. Photo by Internews.

- Within the media sector, USAID will focus through the Media Viability Accelerator on the development of market-based solutions to increase the financial viability of independent media, ensuring they have access to the resources and expertise needed to ensure public oversight and accountability and expose corruption. Within USAID's portfolio to build resilience to mis-, dis-, and malinformation, the Agency will bolster the information ecosystems needed to detect and expose corruption, including access to information, and will seek to counter efforts by authoritarian leaders to co-opt anti-corruption rhetoric. USAID will support the strategic communications campaigns of reform-minded governments to explain anti-corruption efforts and why they matter, as well as design more targeted methods to push back on digital attacks and online harassment targeting anti-corruption reformers.
- USAID's civil-society programming will redouble efforts to convene activists, reformers, and scholars to share successful practices, strengthen their protection measures, and collaborate to improve the efficacy and



Apple growers in Moldova. Photo by USAID.

impact of social movements and collective action to counter corruption and advance reform.

- USAID's Global Labor Program and Counter-Trafficking in Persons activities will work to identify and deter corrupt corporate and state practices that knowingly benefit from labor abuses in business operations and supply chains through the promotion of labor rights and greater accountability for nefarious actors.

- Within its rule-of-law work, USAID will apply a new “people-centered justice” paradigm to ensure that its anti-corruption efforts address people’s day-to-day justice needs. This will include intensifying our focus on directly addressing corruption challenges within the justice sector (including through vetting senior officials and strengthening personnel practices for staff); strengthening the capacity of governmental and nongovernmental organizations to enforce open government practices and freedom of information requirements; and enhancing the

capacity of justice institutions to investigate, prosecute, and adjudicate corruption cases.

- USAID will continue its proven public financial management and good governance interventions to reduce opportunities for corruption and strengthen public institutions.

Food Security and Water Security:

USAID will work with national governments, the private sector, and civil-society organizations to strengthen the policy and enabling environment that regulates the production, registration, distribution, sale, and use of agricultural inputs – including via transparent and reliable enforcement systems. We will explore a multilateral convening on this topic and will support the use of digital technology through our programming in order to reduce corruption in the agriculture sector. USAID will incorporate anti-corruption principles into water security, sanitation, and hygiene sectoral guidance.



A woman sells produce in an open air market in East Africa. Photo by Bobby Neptune.

- Exerting donor leadership to promote integrity in development:** As new initiatives take shape – particularly PGII and our expanded work on climate finance – USAID will play a leadership role in advocating for concrete transparency and anti-corruption expectations for recipient countries. To enshrine this approach, USAID will rally other donors around an anti-corruption *Statement of Principles*, articulating our shared commitment to transparency, accountability, and local ownership in key development sectors to promote long-term sustainability. In addition, USAID will encourage international and regional development banks, including through its seat on the board of the U.S. International Development Finance Corporation, to align their investment practices and priorities with the Administration’s anti-corruption agenda. The prospect of additional multilateral and/or U.S. funding could be used to reward high performance and/or motivate partners to undertake necessary anti-corruption and governance reforms. This effort could draw lessons from the Vice President’s Call to Action for Northern Central America – which explicitly encourages local and international companies with high standards to invest in the region – and an accompanying Rule of Law Pledge through which companies commit not to engage with individuals or entities involved in corrupt behavior.

4

Forging New Partnerships and Coalitions

USAID will deepen its collaboration with other U.S. departments and agencies, Congress, multi-stakeholder bodies, and other donors to spur and sustain anti-corruption progress. USAID will also seed purpose-driven partnerships with a diverse array of anti-corruption champions, especially in the private sector, civil society, and grassroots organizations.

Planned Actions

- Leveraging multilateral, donor, and multi-stakeholder bodies:** USAID will leverage its significant technical leadership among bilateral donors, private foundations, and multilateral institutions to encourage more investment in anti-corruption work and ensure complementarity across actors. As co-lead of the Summit for Democracy Financial Transparency and Integrity Cohort, USAID will promote the effective implementation of ambitious new global and bilateral commitments to tackle transnational corruption, illicit finance, and money laundering, including enhancing adoption and effective implementation of beneficial ownership standards, and financial detection, oversight, and investigation. We will continue championing the Open Government Partnership (OGP) as a vehicle for developing locally owned commitments, including by encouraging the accession of new countries to OGP and deepening OGP implementation in target countries. USAID will increase support for implementation of the EITI in order to pursue increased country membership and surge targeted support to priority sectors (such as the green-energy transition). Leveraging its role as Co-Chair of the Anti-Corruption Task Team within the Organisation for Economic Co-operation and Development’s Development Assistance Committee, USAID will encourage bilateral donors to increase their focus and coordination around addressing transnational corruption and corruption’s impact on development. As part of the wider interagency team, USAID will work closely with other U.S. government stakeholders to maximize the opportunities to advance coalition-building and donor alignment, such as through the United States hosting of the UN Convention Against Corruption Conference of States Parties (2023).

- Mobilizing diverse partners:** USAID will cultivate a broad and diverse partnership base for countering corruption. We will work with partner governments at all levels, including with parliaments and local governments. As part of the Countering Transnational Corruption Grand Challenge, USAID will mobilize a wide range of partners including businesses, associations, technologists, philanthropists, humanitarians, development practitioners, labor organizations, academia, civil-society organizations, governments, and media. At the country level, USAID will develop new partnerships with the private sector, including supporting multi-stakeholder platforms among government, civil society, and the private sector to enhance collective action; increasing private-sector engagement on and advocacy for government and business integrity; incentivizing companies to adhere to international standards of integrity and accountability; and calling on global enterprises to root out corruption in their supply chains. USAID will encourage partnership with companies aligned with these efforts, whether multinationals sensitive to the legal, financial, and reputational risks of corruption or small and medium enterprises that lose out in an economy monopolized by corrupt actors.
- Advancing localization:** As part of the Administrator’s localization agenda, USAID will expand engagement with, and support to, locally based – and particularly community-level – actors, whose insights and action are essential to anti-corruption progress. In line with USAID’s forthcoming Policy Framework, USAID will shift power to local actors and create space for them to influence and exercise leadership over where, how, and why we collaborate to advance anti-corruption outcomes. USAID’s actions under this line of effort will align with the principles reflected in USAID’s Local Capacity Strengthening Policy.¹⁹ We will explore creative grantmaking approaches to extend support to nontraditional partners while helping them develop appropriate internal systems and capacity to manage USG funds effectively. In parallel, we will continue developing a resource for guiding USAID Operating Units in managing their fiduciary responsibilities while increasing partnerships with local partners.
- Improving coordination:** USAID will sustain Agency-wide coordination groups on anti-corruption at both the working and leadership levels. The Asia Bureau also plans to launch a community of practice to exchange regional lessons learned. In parallel, we will strengthen engagement across the interagency, including on bilateral policy decisions, alignment of programming, public diplomacy, asset recovery, and development of holistic anti-corruption action plans for key countries. USAID will also engage with interagency counterparts to maximize the impact of U.S. government anti-corruption sanctions in order to improve the enabling environment for USAID programming and support partners eager to pass actionable information to relevant authorities. We will advance the protection and security of anti-corruption reformers, activists, and partners via USAID programs and resources, as well as connect them to interagency initiatives with similar objectives. USAID will proactively engage with congressional colleagues to advocate for the resources and flexibility needed to exercise anti-corruption leadership and address corruption’s impact on development writ large. All of this work will be enriched by sustained external consultation with a range of local and global practitioners.

¹⁹ Principles: Start with the local system; Develop diverse capacities through diverse approaches; Align capacity development with local priorities; Appreciate and build on existing capacities; Be mindful of and mitigate the unintended consequences of our capacity development; Practice mutuality with local actors; Measure performance improvement in collaboration with local actors. “Local Capacity Strengthening Policy,” USAID, 2022, <https://www.usaid.gov/sites/default/files/documents/LCS-Policy-2022-10-17.pdf>.

5

Institutionalizing Anti-Corruption as a Priority

USAID will institutionalize anti-corruption as a priority through increased programmatic resources, strengthened capacity among an expanded cadre of staff, recognition of exceptional commitment and ingenuity, and a robust organizational home within the Agency. In doing so, USAID will elevate anti-corruption across U.S. government and USAID strategies and practices.

Planned Actions

- ***Expanding resources:*** USAID is committed to improving the scale, flexibility, and consistency of funding available to counter corruption in order to seed more robust, cross-sectoral, and responsive programming.
 - We will expand global, regional, and country-level anti-corruption programming, to enable new responses to transnational corruption and scale what works in confronting corruption within countries. This will involve Mission, Bureau, and Agency resource requests that reflect the increased prioritization of anti-corruption. Overall, we will advocate for increasing USAID resources for anti-corruption from \$107 million in Fiscal Year (FY) 2021 to \$250 million in FY 2024. Actual resources are contingent on the availability of appropriated funds.
 - To complement an expansion in dedicated resources for anti-corruption, we will generate and disseminate a funding primer that highlights available flexibilities in the use of existing earmarked funds for addressing corruption in climate, health, and other sectors, consistent with legal and policy requirements and in response to corruption issues that inhibit the achievement of the goals underlying the earmarks. Further, we will engage across Missions to share effective practices to work within and across earmarks to address corruption challenges in multiple sectors.
- ***Bolstering staffing and structure:*** USAID will establish a permanent and independent home for anti-corruption via a dedicated Center within a new Bureau for Democracy, Human Rights, and Governance. This Anti-Corruption Center will mobilize the human, technical, and programmatic resources and capacity required to support the continued prioritization of anti-corruption and responsiveness to openings (or backsliding). We will equip USAID with the human capital to support a robust anti-corruption agenda, both in Washington and at Missions, via direct-hire and program-funded positions. This will involve Mission, Bureau, and Agency resource requests that reflect the increased prioritization of anti-corruption. Actual staffing levels are contingent on the availability of appropriated funds.
- ***Building anti-corruption capacity:*** USAID will cultivate and cross-train a network of USAID staff – in Washington and the field and across all technical areas and functions – to build a diverse cadre with anti-corruption proficiency. As part of this effort, USAID will develop a rigorous training curriculum that addresses the intersection of corruption and other key topics, including conflict, culminating in an anti-corruption certificate. We will also incorporate new anti-corruption guidance into staff orientation and ongoing training, including for Mission Directors and other USAID staff; support Foreign Service National staff in bolstering their expertise on corruption and enhancing their leadership role in advising on anti-corruption within Missions; and host rotations of Foreign Service Officers and Foreign Service Nationals from various backstops in the new Anti-Corruption Center to bring a wide range of experience to USAID’s anti-corruption efforts and increase staff knowledge, skills, and abilities to identify and address

corruption within their sectors. USAID will also explore opportunities to forward-deploy anti-corruption specialists in select USAID Regional Missions to enhance timely response, including to address transnational corruption dynamics and foster regional learning and capacity building across Missions.

- ***Integrating anti-corruption into global, regional, and thematic strategies and policies:*** We will work with the interagency to enshrine a focus on anti-corruption in core Administration strategies and USAID policy documents, including the USAID Policy Framework. USAID will ensure robust anti-corruption components are included in the development and implementation of a new USAID DRG Policy; the U.S. Transnational Organized Crime Strategy; the 2023 revision of the Women, Peace, and Security Strategy; the USAID Rule of Law Policy; and development of other sectoral and regional strategies.

Alignment with Regional Strategies

USAID will build on anti-corruption components in existing regional policy frameworks such as the U.S. Strategy for Addressing the Root Causes of Migration in Central America (and the associated Strategic Approach to Combating Corruption in Northern Central America) and the U.S. Strategy Toward Sub-Saharan Africa, and seek to promote anti-corruption synergies in other regional processes.

- ***Rewarding anti-corruption leadership:*** USAID will support and empower Mission Directors and other USAID leadership in flexing USAID’s policy voice to advance anti-corruption. USAID will consider establishing an Award to recognize excellence in combating corruption at Missions and in Washington, and will integrate anti-corruption components into performance management measurements. Other actions under this banner include presenting on anti-corruption at USAID Mission Directors’ conferences and other convenings and sustaining USAID’s Mission Champions Circle – a platform for peer learning and dialogue with Washington.
- ***Strengthening Monitoring, Evaluation, and Learning (MEL) systems:*** USAID will improve our ability to capture the totality of *what* the Agency is doing to combat corruption – including via more widespread use of Key Issue reporting – as well as *how well* USAID’s approaches are working on topics of shared interest like grand corruption. As part of implementation of this policy, Operating Units will be asked how they are aligning their programming with the three TFAC objectives and expanding corresponding resources. This will involve developing better standard indicators that more accurately capture the range of our work and the impact we seek, while encouraging the adoption of more anti-corruption indicators in non-DRG sectors. To strengthen our evidence base about what works, we will conduct more timely, iterative, and robust program evaluations, with fit-for-purpose methodologies and longer time horizons to capture sustainability. Where feasible, we will commission more external impact evaluations of USAID’s anti-corruption work, looking across sectors, regions, and/or modalities (i.e., programming as well as policy engagement, donor coordination, etc.). To cultivate learning from successful (and less successful) anti-corruption approaches, USAID will facilitate peer-to-peer learning across Missions, Bureaus, and IOs. In this vein, USAID will issue new MEL guidance as part of forthcoming technical guidance. Throughout, we will apply USAID’s collaborating, learning, and adapting approach to anti-corruption programming, especially in politically fluid environments and when piloting experimental approaches. We will also track the complex interactions between our interventions, keeping an eye on their overall, systemic impacts.

6

Safeguarding Development and Humanitarian Assistance from Corruption Risk

USAID will proactively manage corruption risk in the countries in which it works through dedicated anti-corruption interventions, cross-sectoral programs, improved monitoring and analysis, and increased collaboration with local oversight institutions. The Agency is committed to improving upon its already robust system of safeguards to protect the integrity of individual programs and ensuring that our overall assistance does not enable grand corruption and kleptocracy. USAID will ensure that these safeguards are fit for purpose – including enabling USAID’s localization agenda – while increasing dialogue with interagency counterparts, implementing partners, and other donors on the challenges of operating in severely corrupt environments and strategies for managing these risks.

Planned Actions

- Operational safeguarding:**²⁰ USAID is committed to protecting the integrity of foreign assistance and the stewardship of taxpayer funds, in line with the [USAID Anti-Fraud Plan](#). Our operational anti-corruption safeguarding architecture includes risk-management systems, acquisition and assistance controls and regulations, suspension and debarment, partner vetting, award management, monitoring and oversight, and capacity building and training, among others. By the end of first quarter 2023, USAID will issue a Reference Guide to USAID Anti-Corruption Operational Safeguards, which will highlight operational safeguards, risk-management processes, and internal controls throughout the Program Cycle. This Reference Guide is part of a suite of tools USAID is developing to facilitate mainstreaming of anti-corruption safeguards and processes throughout the program cycle. For example, USAID is exploring ways to improve third-party monitoring and oversight of financial controls and performance of USAID programs. USAID is ramping up staff capacity to manage corruption risk through increased fraud awareness training. USAID will also identify ways to more systematically learn from our implementing partners regarding the risks of fraud and corruption in the use of USAID funds.
- Strategic safeguarding:** USAID will identify and address corruption risk at the strategic level and within the Agency’s programs, policies, and practices, while expanding efforts to ensure that foreign assistance and engagement do not inadvertently contribute to corruption. This includes

Risk Appetite Statement

The Agency's risk appetite statement^[1] (RAS) outlines the level and type of risk the Agency is willing to accept to achieve our mission and objectives. The RAS balances a zero risk tolerance for staff inaction or non-reporting of corruption, fraud, waste, or violation of law that involve U.S. taxpayer funds, with a high risk appetite for experimenting with new and innovative means of preventing and mitigating fraud, waste, abuse, corruption, diversion, and mismanagement of foreign assistance.

^[1]<https://www.usaid.gov/sites/default/files/documents/596mad.pdf>

²⁰ This section outlines requirements related to USAID funds and activities; anti-corruption rules for USAID personnel are governed by federal ethics rules. These rules include the criminal Bribery, Graft, and Conflicts of Interest statutes in 18 USC chapter 11 and the Standards of Ethical Conduct for Employees of the Executive Branch in 5 CFR part 2635, as outlined in USAID’s Automated Directives System chapter 109.

ensuring USAID’s strategies, plans, and interventions are fully informed by local context and carefully analyzed, designed, and implemented, at a minimum, to avoid inadvertently fueling corruption in a country and, ideally, to target the core drivers of grand corruption and kleptocracy. To bolster this work, USAID will augment risk-mitigation measures in environments with severe corruption. Where needed, we will also develop a “common operating picture” of corruption risk with interagency partners and means of reconciling competing policy priorities. Leaders across the Agency will engage in candid conversations, internally and with external partners, to weigh the realities of operating in highly corrupt environments. Where possible, we will design programming and pursue diplomacy to target systemic corruption vulnerabilities, such as in the procurement process. Additionally, as part of USAID’s engagement with international financial institutions and other donors, we will encourage reflection on these dynamics and alignment of approaches. Only by creating safe spaces to discuss these dilemmas will we be able to develop effective solutions.

- **Strengthening local oversight bodies:** In some environments, the most effective way to protect U.S. assistance will be to pair international oversight with support to local monitoring, auditing, and enforcement bodies. Such support can yield benefits *in* protecting donor funds and domestic resources, as well as strengthening the performance of public institutions. USAID will advance this work by deepening its collaboration with the U.S. Government Accountability Office-Center for Audit Excellence and the International Organization of Supreme Audit Institutions-Donor Cooperation. Through our agreements with these specialized bodies, USAID is able to mobilize critical support – including training, technical assistance, and other products and services – for challenged Supreme Audit Institutions in developing countries. USAID will also expand its partnership with the International Federation of Accountants (IFAC) under the memorandum of understanding with IFAC; the Global Fund to Fight AIDS, Tuberculosis, and Malaria; and Gavi, the Vaccine Alliance to improve financial transparency, accountability, and anti-corruption in the health sector. With IFAC’s oversight of 180 professional accountancy organizations across 135 jurisdictions, this collaboration is vital to building a strong cadre of ethical accountancy professionals in public health institutions.

...In the absence of nuanced analysis of local political, economic, and social dynamics, adequate risk management measures, and alignment with other U.S. Government priorities, foreign assistance can be diverted or inadvertently reinforce corrupt power structures. To safeguard its assistance dollars, the U.S. Government must therefore assess the absorptive capacity of prospective partners, rationalize investments across the interagency, operate its programming with the utmost transparency, and ensure that its assistance efforts fully align with broader policy goals.

-United States Strategy on Countering Corruption, December 2021



Women in eastern Turkmenistan brainstorm business plan ideas during a series of trainings on entrepreneurship hosted by a local civil society organization. Photo by K. Kadyrov, USAID Governance Support Program in Turkmenistan.

MEASURING OUR PROGRESS

USAID is committed to robust implementation of this Policy – demonstrating results, adapting where needed, and harnessing learning to inform future planning. The ACTF, and its successor unit, will be responsible for coordinating implementation of this Policy, in collaboration with counterparts across the Agency and interagency.

The Agency will rely on information that is already mandated, to the fullest extent possible, to assess progress toward fulfilling this Policy’s vision. In particular, all USAID Operating Units are required to describe “activities that strengthen the overall ecosystem for combating corruption, including the capacity of countries to prevent, detect, investigate, prosecute, and sanction it” under the Anti-Corruption Key Issue in the Operational Plan (OP) and the Performance Plan and Report (PPR). It is critical that all Bureaus, Missions, and IOs, regardless of sector, report their plans through this key issue so the ACTF, and its successor unit, can form a comprehensive picture of what USAID is doing to counter corruption.

As we adapt current systems to monitor implementation of this Policy, USAID may need to collect additional information, especially related to how existing programs and emerging plans align with the overarching goal and objectives of TFAC. To reduce the burden on USAID Operating Units and staff, we will approach this task with a high degree of consultation and ensure that any new requirements are narrowly targeted and tailored to just what is needed for accountability and learning purposes. Any additional reporting requirements will be reviewed and evaluated via existing Agency processes.

Three years after this Policy's release, the Agency will produce a progress report for the Administrator and the public, which will be shaped by an external evaluation and information furnished through USAID's systems. Monitoring of and reporting against this Policy – and the concrete actions it commits to – will be complemented by USAID contributions to an annual report to the President regarding progress toward implementing the U.S. Strategy, as informed by quarterly interagency progress updates. USAID will also offer a briefing at least once a year to congressional committees on progress made in implementing this Policy.

In addition, as a learning organization, USAID will build opportunities to pause, reflect on, and adapt the approaches in this plan. This may involve consultations with USAID Operating Units and Mission stakeholders, aimed at assessing progress and identifying growth areas, drawing from existing indicators. This process will be informed by a stocktaking exercise conducted in 2021, which provides a baseline for the Agency's anti-corruption activities.

ANNEX

Guidance to support implementation of this Policy are available at <https://www.usaid.gov/anti-corruption/resources>.

Commitments in this Policy also advance implementation of the U.S. Strategy on Countering Corruption, as summarized in the chart below.

USAID Policy Line of Effort	Specific USAID Planned Action	U.S. Strategy Pillar	U.S. Strategy Strategic Objective	Secondary Pillar Supported
1 - Expanding USAID's Efforts to Address Contemporary Corruption Threats	Activating innovative programming to tackle transnational corruption	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.3 increase focus on the transnational dimensions of corruption	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy
1 - Expanding USAID's Efforts to Address Contemporary Corruption Threats	Countering strategic corruption	II. Curbing Illicit Finance	2.2 work with allies and partners to address governance weaknesses and other deficiencies	III. Holding Corrupt Actors Accountable
2 - Exercising Holistic and Responsive Leadership	Establishing a concept of operations for Anti-Corruption Response	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.4 organize and resource the fight against corruption	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
2 - Exercising Holistic and Responsive Leadership	Sharpening and regularizing political analysis	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.1 enhance corruption related research, data collection, and analysis	
2 - Exercising Holistic and Responsive Leadership	Deepening bilateral policy engagement	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives	5.4 improve consistency and risk analysis across foreign assistance	

USAID Policy Line of Effort	Specific USAID Planned Action	U.S. Strategy Pillar	U.S. Strategy Strategic Objective	Secondary Pillar Supported
2 - Exercising Holistic and Responsive Leadership	Enhancing strategic communications for anti-corruption impact	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.2 improve information sharing domestically and internationally	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
2 - Exercising Holistic and Responsive Leadership	Advancing cutting-edge research and innovation	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.1 enhance corruption related research, data collection, and analysis	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
3 - Countering Corruption Across Sectors	Identifying and acting on cross-sectoral opportunities	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.5 integrate anti-corruption considerations into regional, thematic, and sectoral priorities	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
3 - Countering Corruption Across Sectors	Advancing cross-sectoral anti-corruption progress	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.5 integrate anti-corruption considerations into regional, thematic, and sectoral priorities	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
3 - Countering Corruption Across Sectors	Exerting donor leadership to promote integrity in development	IV. Preserving and Strengthening the Multilateral Anti-Corruption Architecture	4.2 redouble our efforts in multilateral fora	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption

USAID Policy Line of Effort	Specific USAID Planned Action	U.S. Strategy Pillar	U.S. Strategy Strategic Objective	Secondary Pillar Supported
4 - Forging New Partnerships and Coalitions	Leveraging multilateral, donor, and multi-stakeholder bodies	IV. Preserving and Strengthening the Multilateral Anti-Corruption Architecture	4.2 redouble our efforts in multilateral fora	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption
4 - Forging New Partnerships and Coalitions	Mobilizing diverse partners	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	5.3 leverage innovation in the fight against corruption	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
4 - Forging New Partnerships and Coalitions	Advancing localization	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives	5.3 leverage innovation in the fight against corruption	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption
4 - Forging New Partnerships and Coalitions	Improving coordination	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives	5.1 elevate and expand the scale of diplomatic engagement and foreign assistance	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption
5 - Institutionalizing Anti-Corruption as a Priority	Expanding resources	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives	5.1 elevate and expand the scale of diplomatic engagement and foreign assistance	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption
5 - Institutionalizing Anti-Corruption as a Priority	Bolstering staffing and structure	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.4 organize and resource the fight against corruption	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives

USAID Policy Line of Effort	Specific USAID Planned Action	U.S. Strategy Pillar	U.S. Strategy Strategic Objective	Secondary Pillar Supported
5 - Institutionalizing Anti-Corruption as a Priority	Building anti-corruption capacity	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.4 organize and resource the fight against corruption	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
5 - Institutionalizing Anti-Corruption as a Priority	Integrating anti-corruption into global, regional, and thematic strategies and policies	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.5 integrate anti-corruption considerations into regional, thematic, and sectoral priorities	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
5 - Institutionalizing Anti-Corruption as a Priority	Rewarding anti-corruption leadership	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.4 organize and resource the fight against corruption	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
5 - Institutionalizing Anti-Corruption as a Priority	Strengthening Monitoring, Evaluation, and Learning (MEL) systems	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption	1.1 enhance corruption related research, data collection, and analysis	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives
6 - Safeguarding Development and Humanitarian Assistance from Corruption Risk	Operational safeguarding	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives	5.4 improve consistency and risk analysis across foreign assistance	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption

USAID Policy Line of Effort	Specific USAID Planned Action	U.S. Strategy Pillar	U.S. Strategy Strategic Objective	Secondary Pillar Supported
6 - Safeguarding Development and Humanitarian Assistance from Corruption Risk	Strategic safeguarding	V. Improving Diplomatic Engagement and Leveraging Foreign Assistance Resources to Advance Policy Objectives	5.4 improve consistency and risk analysis across foreign assistance	I. Modernizing Coordinating and Resourcing U.S. Government Efforts to Better Fight Corruption