**Evaluation of UNDP Support to**

**the Jordan Anti-Corruption Commission:**

**Final Report**

*Revised*

30 September, 2012

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**List of Acronyms and Abbreviations**

AC Anti-Corruption

CP Country Program

CPI Corruption Perceptions Index

DGTTF United Nations Democratic Governance Thematic Trust Fund

EU European Union

JACC Jordan Anti-Corruption Commission

MOPIC Ministry of Planning and International Cooperation

NACS National Anti-Corruption Strategy

PM Project Manager

UNCAC United Nations Convention Against Corruption

UNDAF United Nations Development Assistance Framework

UNDP United Nations Development Program

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# Executive Summary

The evaluation took place 5-9 August 2012 and was focused on assessing a number of key areas including project management, design, relevance, effectiveness, and impact.The aim of the evaluation was to ascertain the strengths and weaknesses of the project within these areas. The final chapter of the evaluation report presents a number of conclusions that should be taken into consideration by UNDP when designing and implementing future support for anti-corruption in Jordan.

The main findings are as follows:

* *Project Management:* The management structure was appropriate on paper but not in practice. The project had little *ex ante* needs assessment, design, or planning, and relied heavily on the Project Manager to develop the content of the project in consultation with JACC. Given the differing views among members of the Project Board, the need for consensus ultimately delayed and helped defeat some of the high-level objectives of the program.
* *Project design:* The project design faithfully adhered to the requirements of UNCAC, the National Anti-Corruption Strategy, and good international practice. But, in the context, it was unrealistic and unsuited to achieve practical results in a limited time frame. For an agency striving to gain traction and legitimacy in fighting corruption to carry out the whole program in just a few years would be impossible without extraordinary effort. The latter, in turn, would have required a high level of consensus, organization, focus, and discipline – all of which were lacking.
* *Relevance and appropriateness of the project:* As designed, the project was focused on relevant issues important to development and enhanced governance in Jordan, and to the success of the JACC. It is also clear that the project fit with the mandates of UNDP and the Jordanian Government for the same reasons. But the project did not fit well with the social, political, and bureaucratic realities on the ground. In practice, the project and its implementation context enabled the JACC to pursue its own strengthening in ways that were inconsistent with the project’s intent.
* *Effectiveness and Efficiency of the project:* The record here is mixed. On the one hand, the project delivered a significant number of activities including training seminars, study tours, component strategies and plans, technical assistance reports, and public outreach efforts. Also, the joint design and implementation of the project prompted debate, adjustment, and learning. On the other hand, most of the outputs were either delayed, shelved, not implemented, or not made public. Nor did the project deal very effectively with problems.
* *Impact and sustainability of the project:* It is difficult to discern any sustainable impacts of the project at this time, although some of the training appears to have been beneficial. Other potential impacts in such areas as complaints and investigation procedures, prevention studies and guidelines, and the communications strategy will depend on follow-up action by the JACC.

The main conclusions for future projects are as follows:

* Thorough project preparation is essential. This must include in-depth assessment of capacity, local context and dynamics, and incentives. For the JACC, it would also make sense to revise the NACS Action Plan to make it more realistic and to give it a clearer order of priority and sequence.
* A project aimed at building the capacity of a major institution such as JACC needs financial, personnel, and other resources of a scale befitting the objectives in order to succeed. This means more attention from senior levels at UNDP, and a more seasoned expert managing the project – and therefore able to be a strong interlocutor with the JACC. On both the UNDP and JACC sides, it would also make sense to leverage more external resources (within Jordan).
* The combination of National Execution with a focus on capacity-building creates a critical need for oversight and follow-through. Any project of this kind will need strong back-stopping and monitoring by the UNDP country office. There should be well-defined outcomes envisioned in the activity designs, for example papers or guidelines to be produced as part of a substantive project component.
* Any project in this area in the near future should be done via Direct Execution. In the current project, the JACC was able to use UN resources to pursue an agenda at odds with key project objectives. At such point as consensus emerges on a coherent, realistic plan for building a well-defined set of anti-corruption capabilities that UNDP can support, then National Execution could be considered. An alternative might be a hybrid of National and Direct methods – i.e. participatory planning, but with specific agreed outputs, timetables, follow-up, and sanctions.
* The regular, prompt publication of detailed data on JACC performance should be a fundamental condition of UNDP assistance, as well as a core principle of the JACC Law and organic regulations. This information should cover all relevant metrics – case intake and progress, referrals, prosecutions, sanctions, production and reception of policy proposals and analytical studies on prevention, surveys of public experience and perception of JACC, etc. Further, UNDP and JACC should seriously consider, as part of any future project, the establishment of a citizen review board.

Introduction

This final evaluation report concerns the UNDP project entitled “Support the Anti-corruption Commission to Implement Elements of the National Anti-Corruption Strategy” and implemented from March 2010 through February 2012. The project aimed to develop the capacities of the Jordan Anti-Corruption Commission staff to implement elements of the National Anti-Corruption Strategy (NACS). This was to be done, according to the Project Document, through “a clearly defined capacity development framework that would ensure full ownership by the Commission.” UNDP undertook to provide technical assistance and training support to advance this objective, in consultation with other development partners.

The project both responded to and was shaped by the Jordanian context. As a stable middle-income country in a troubled region, Jordan has maintained a comparatively strong position in the standard international governance indicators (e.g. Transparency International’s CPI) and a reputation for enlightened leadership. At the same time, it faces challenges typical of developing countries in the Arab world. These include the intrusion of *wasta* and rent-seeking in the policy sphere, along with a lack of transparency in the workings of government. The conditions of public service employment are also adverse, the relatively low pay and the rigidities of hiring standards and incentives making it difficult to attract the most promising professionals into government jobs.

Jordan has taken a number of steps over the past two decades both to bring democratic reform to its system of governance and to couple that with measures to combat corruption. In 1996, Jordan established the Anti-Corruption Department under the General Intelligence Directorate, in order to pursue cases of financial and administrative corruption. Jordan signed the United Nations Convention Against Corruption (UNCAC) in December 2003 and ratified it in February 2005. In the latter year, King Abdullah II stepped up the fight against corruption by directing the government to form an independent commission to draft a law to combat corruption and *wasta*.

As a result, the Jordan Anti- Corruption Commission was established in 2006. The JACC took over the anti-corruption intelligence and investigative functions of its predecessor department, along with some senior personnel including (eventually) the Chair, Mr. Bino. The 2006 law establishing the Commission, amended in 2012, added other functions including asset seizures and travel bans, prevention activities such as policy studies, awareness and communications, international cooperation, and complaints handling. The Commissiondeveloped a National Anti-corruption Strategy for the period 2008-2012. The strategy calls for reducing opportunities for corruption and increasing the effectiveness of the entities charged with combating and controlling corruption. This is the first strategy of its kind in Jordan.

This report takes the above context into account in evaluating UNDP’s support to the JACC. We proceed as follows. The next two sections provide brief overviews of the project being assessed as well as the purpose and methodology of the evaluation. The fourth part presents the findings, with responses to the five key evaluation questions posed in the terms of reference. The fifth part concludes with a discussion of conclusions, lessons, and recommendations.Project Description and Context

The project’s objective is to develop the capacities of JACC staff to implement the 2008 National Anti-Corruption Strategy. The strategy, in turn, states its main goal as follows:

to reduce available opportunities for engaging in corrupt actions through the creation and development of administrative and legal frameworks effective for both public and private sectors.

The NACS identifies the following components as necessary for achieving the overall objective:

1. Strengthening the Capacity of the Anti-Corruption Commission
2. Prevention of Corruption Component
3. Education, Training and Public Awareness Component
4. Law Enforcement Component
5. Coordinating Anti-Corruption Efforts Component
6. International Cooperation Component.

In supporting the JACC in its implementation of the National Strategy, the UNDP project targets the following outputs[[1]](#footnote-1):

**Output 1:** Management arrangements established and maintained for the duration of the project.

**Output 2:** Jordan’s compliance with UNCAC requirements to strengthen AC legislation reviewed and assessed.

**Output 3:** Adequate mechanism for processing of complaints, investigation procedures developed.

**Output 4:** Corruption risk management and preventive anti-corruption guidelines developed.

**Output 5:** The role and function of the internal monitoring units within the ministries and government’s institutions strengthened.

**Output 6:** Advocacy, awareness and outreach strategy developed.

The project outputs largely track the components of the NACS, with emphasis on prevention, communications, complaints, and coordination.

The Project has been funded largely by the UN Democratic Governance Thematic Trust Fund (DGTTF), which is also supporting this evaluation. The initial two-year project budget amounted to JD 194,000, to which the UN added a further JD 37,000 from other sources. The total funding is equivalent to some 3.7% of JACC’s state budget allocation (the UN funds are not accounted as part of that budget), and an estimated 23% of JACC’s budget for capital expenses (including equipment, training, and other non-operating expenditures). On the one hand, the scale of the UN’s funding is rather small, especially when compared to the more recent EU twinning project. On the other hand, the resources that the UN provided during the life of the project, as a proportion of total investment in JACC’s capacity-building, are quite significant and would justify UNDP in regarding itself as a full partner with the Commission in the planning and implementation of the project. (On the UNDP side, the program of support to JACC comprises a minority share of governance programming in Jordan and a very small proportion of overall UNDP support to the country.)

The modality of project implementation is that of “National Execution,” with the JACC named as the executing agency. A UNDP document[[2]](#footnote-2) describes the modes of execution as follows:

UNDP’s support to the Hashemite Kingdom of Jordan is done though support to the Institutions of the State. The UNDP currently offers support to selected institutions of the state within the context of the UNDP global Strategy... The support is provided through…the National Execution modality (NEX) where “the overall management of UNDP programme activities in a specific programme country is carried out by an eligible national entity of that country"…

The Project Document identifies the roles of key players in the project. The JACC is responsible for, realizing the goals of the project, and is accountable to the government coordinating authority (MoPIC) as well as UNDP. The Commission and UNDP are jointly responsible for the recruitment and contracting of all staff hired for this project. UNDP is designated the overall “budget holder” under the National Execution modality, responsible for ensuring adequate financial management, and handling all requests for authorizations, payments, and related processes. A Project Board and Project Coordination Committee are envisioned, the former serving as a decision forum for the key players (JACC, UNDP, MoPIC) and the latter coordinating with other donors.

A number of contextual factors[[3]](#footnote-3) bear mention here, since they influenced the likelihood of project success. Jordan’s status as a relatively stable middle-income country with a coherent structure of legitimate authority in the form of the monarchy provides advantages, as do its high rates of literacy and urbanization. On the other hand, the country struggles with regional social patterns such as *wasta* that tend to privilege connections and secret dealing. The JACC began its operations and launched its strategy amid raised expectations, due in large part to the King’s public show of support. But those high expectations are becoming a liability as the Commission struggles with the limits to its authority and challenges to its legitimacy. In this context, a UNDP project with a small budget and staff is tasked with assisting the Commission in its efforts to learn “on the job,” to build its capacities, and to succeed in limiting corruption.

A direct challenge to the project’s likelihood of success is the difficulty the Commission has in recruiting and keeping highly-qualified staff. Pay at JACC is reported to be relatively good compared to other agencies of government, but fiscal stringency affects the Commission as it does other departments. Salaries are not competitive with the private sector and are reportedly insufficient to support a family in Amman. Supplements for investigators handling sensitive cases help at the margins, but civil service recruitment and promotion rules do not allow sufficient flexibility for the JACC to tailor staffing to its needs. As a result, the Commission has a shortfall of highly experienced staff, and lacks capabilities in specialized areas relevant to its investigations, such as finance and engineering. Outsourcing and secondment are used to fill some of these needs (e.g. specialized researchers for prevention studies, and professionals required for police investigation and prosecutorial functions).

# Evaluation Purpose, Methodology

The terms of reference for this evaluation call for:

An evaluation of the effectiveness of the project including design, relevance, effectiveness, efficiency, impact, sustainability, identifying challenges, constraints and success factors and providing conclusions and lessons learnt.

The key questions to be addressed are these:

* *Project management structure:* Was the structure appropriate for carrying out implementation, monitoring, reporting and establishing partnerships?
* *Project design:* Was the design based on a proper analysis of the context and needs, clear objectives and strategy, baselines or benchmarks for performance?
* *Relevance and appropriateness:* Was the project relevant and appropriate to national goals, the JACC’s mandate and functions, and the UNDP’s objectives?
* *Effectiveness and efficiency:* Were outputs achieved in a timely and efficient way? Did the project deal effectively with problems, risks, and failures?
* *Impact and sustainability:* Did the project activities lead to local ownership, capacity-building, and other benefits that will accrue beyond the life of the project itself?

This is an evaluation of limited scope and depth. The project targeted capacity-building and related outcomes in an area fraught with political, technical, and empirical difficulties: anti-corruption. The project itself was relatively small, and so the evaluation is likewise modest in scope and resources. The author, an international consultant, was engaged to spend one week in Jordan (with very limited preparation time), and to spend a similar period of time writing up findings. The consultant has significant background in anti-corruption, but limited Arabic language facility – and it appears that, of all the project-related documents that are worth reviewing, only a small portion are available in translation.

The approach and methodology employed for the evaluation are very straightforward. The method is qualitative, based on interviews, review of documents and data, and analysis. The approach to the evaluation is based on the consultant’s prior studies of corruption and responses to it, notably the establishment and operation of anti-corruption agencies. This background (together with prior experience in Arab and Near Eastern countries), provided the consultant an analytical framework for understanding and situating the information gathered (see the next part of the report).

The first stage of the evaluation, prior to the visit to Amman, involved review of project documents and desk research on the JACC and on corruption and governance in Jordan more generally. This desk review has continued during and after the country visit and has included more project outputs and JACC documents as well as further research on anti-corruption agencies, capacity-building programs for those agencies, and related matters.

In the second stage, the consultant visited Amman and held interviews with key persons at the JACC, UNDP, related departments of government, and independent civic and research organizations (see the list of persons interviewed in Annex 4). The list of Main Questions in the consultant’s TORs, summarized above as “key questions,” served as the protocol for structuring the interviews. Several interviews were conducted in English, although the majority took place in Arabic. A member of the UNDP staff serving as Monitoring and Evaluation Focal Point provided translation assistance.

In the third stage of the evaluation, the consultant returned to home base, there to review and analyze the interview notes and documents collected, to do follow-up research, and to ask follow-up questions by e-mail and telephone. The analysis involves “triangulation” of the various information sources, interview responses, and perspectives. The third phase concludes with the writing of the report, followed by review and comment, and final revisions.

# Findings

In this part, we present the findings of our evaluation study. The analysis below responds to each of the key questions posed in the TORs (see above).

1. Project management structure***:* Was the structure appropriate for carrying out implementation, monitoring, reporting and establishing partnerships?**

The management structure appears to have been appropriate on paper but not in practice. None of the interviewees was satisfied with the management structure of the project. Those involved on the UNDP side, as well as some independent observers, expressed concern that the project had little *ex ante* needs assessment, design, or planning, and relied heavily on the Project Manager to develop the content of the project in consultation with JACC. Given the differing views among members of the Project Board, the need for consensus ultimately delayed and helped defeat some of the objectives of the program.

*Project Team: structure, implementation, reporting*

The hiring of the Project Manager (PM) and Assistant was handled by a joint committee of UNDP and the JACC, consistent with project’s emphasis on participation and consensus. The PM’s office was centrally located in the JACC not far from that of the Chair. The Project Document lists the PM’s many management duties and adds that this person should “[p]rovide leadership and strategic thinking to senior JACC colleagues to ensure that project activities focus on critical areas.” The main qualifications listed are an advanced university degree and six years’ experience. The PM was supported by a junior Assistant.

At first glance, this arrangement appears reasonable for a small project. But it is less so in light of the importance of the JACC, the difficulty of its work, the seniority of the Commission’s leaders, and the PM’s responsibility not only for management but also for providing “leadership and strategic thinking.” These factors call for a more seasoned, expert leader able to work effectively on high-level matters of policy and governance. The project may be small in budget terms, but its scope and ambitions are large. On the other hand, recruiting a more senior PM would have been a challenge, given the modest resources of the project. The aims, resources, and staffing of the project were not fully consistent.

The structure of the project posed a set of challenges that the team proved unable to meet effectively. The PM herself had not been involved in the original design of the project. Since the project was only vaguely sketched out, and an actual assessment of needs and problems had not been carried out, she needed to work with UNDP and JACC to conduct a quick assessment and accordingly to fill in the project outline with content. This led to protracted discussions and then repeated negotiations over how to proceed at several points in the two-year life of the project. There were differences of opinion among members of the Project Board (and reportedly within the Commission Board) – with MoPIC proving especially obstructive. A vaguely defined program combined with a lack of consensus produced a series of stalemates and changes in direction. The result was delay and in some cases a significant divergence between the agreed project outputs and the actual results – including the cancellation or failure to deliver a number of the outputs.

The differing visions and expectations of UNDP and the JACC required greater precision, not only in the project design but in the allocation of decision authority and the mechanism for resolving differences. In practice, these weaknesses might have been overcome by more active oversight and responsiveness by the UNDP country office, and in particular by its providing more robust guidance and managerial support to the Project Manager. The latter appears to have been left largely on her own in dealing with the JACC on the direction of the project components and the conflicts that arose over this. In some sense, the UNDP country officials were also in a difficult position, given their small staff of generalists, the modest resources of the project, and the other responsibilities that pressed for their attention. In the end, the communications and flow of support between the PM and her UNDP supervisors proved less than ideal.

A more senior PM might have resolved these problems, but with difficulty. In practice, the PM’s assertion of UNDP authority ran into opposition. Viewed from the Commission’s side, the UNDP and its PM “wanted to control everything.” She opposed the JACC’s plan to set up its own forensic lab, even though this was “beyond her authority.” From the Commission’s perspective, this points to a need for greater clarity regarding the allocation of powers in the project. The Commission suggested that it might have benefitted from some orientation for its staff on UN procedures, with practical information on how to work with UNDP. This shows a disjuncture of sorts, between, on the one hand, UNDP with its unfamiliar structure and procedures, and on the other hand the JACC with its strongly-held views and priorities that seemed to clash at various points with the project framework.

A case in point is provided by the Communications Strategy. The local consultant hired for this component reported that JACC staff were interested and receptive, and she was able to provide training, produce publicity materials, and present a strategy. But when it came to the adoption and implementation of the communications strategy, there appears to have been a disconnect with both UNDP and senior officials of the JACC. While the Project Manager was supportive of the communications consultant, it appears UNDP failed to provide the necessary backup. In the absence of clear direction from JACC and UNDP leadership, the Project Manager was unable to push the consultant’s recommendations or to achieve clarity on the strategic direction in the area of communications – and the communications strategy was shelved.

From UNDP’s point of view, the indicators for this project component were achieved, since the strategy was presented and eventually approved – with some amendments – in a JACC Board meeting. As for the lack of implementation by the Commission, this is explained as a necessary delay for planning and preparation. The strategy recommendations involved some restructuring; in response, JACC retained a consulting firm (from its own funds) to develop the requisite plans. (For further details on the project’s achievement of targets and indicators, see Annex 3).

The Project Document calls for regular reporting on implementation by the PM, and sharing of the reports with JACC before submission. The records indicate that quarterly and annual reports were largely complete and timely.

*Project Board*

The Project Board includes representatives of JACC, MOPIC, and UNDP. It is, according to the Project Document, “responsible for making by consensus management decisions…when guidance is required by the Project Manager,” ensuring the flow of resources and arbitrating conflicts. It is clear from the amount of work completed – technical assistance, training, studies, etc. – that the Project Board did manage to ensure a sufficient flow of resources and activity. In other words, in areas that were routine or based on prior agreement, the project ran smoothly in most areas. But on strategic matters requiring discussion by the Project Board and decisions by JACC, there were conflicts and delays.

The JACC – both its original Board, and to a slightly lesser extent the new membership put in place during 2010 – had little experience and apparently little tolerance for working with international donors or consultants. Early on, the (original) JACC Board strove to marginalize the PM, denying her access to the Chairman. The PM reports having had to chase after the senior officials of the Commission in order to get them to articulate their priorities. The (original) Chairman reportedly did not wish to take responsibility for project expenditures. The PM had somewhat more success with the succeeding (current) Board. The latter group over time proved more open and amenable to cooperating with UNDP and its representative. Still, there has apparently been resistance, conflict, and delay at several points.

The JACC appears to have been a difficult partner for UNDP – unaccustomed to working with outsiders and resistant to transparency and accountability. The Commission has difficulty accepting outside help, especially when this might require it to revise its usual procedures or priorities. Senior officials at the JACC repeatedly told the PM (and the evaluation consultant) that they did not welcome international consultants. In the Commission’s view, foreign consultants generally are too expensive, they need both translation assistance and orientation to the context of Jordan, and their output is not sufficiently relevant to warrant the extra effort and expenditure.[[4]](#footnote-4) The underlying rationale cited by some of the interviewees was to save money for such other uses as study tours, technology, and software. JACC officials made clear their priority interest in capital investments over advisory services, with repeated references to the need for software packages, a forensic lab, and a larger building.[[5]](#footnote-5)

It was suggested by some that the above tendencies show the Commission’s lack of a long- or even a medium-term vision. Alternatively, the JACC has simply had a *different* vision from UNDP, or at least a different view of how to reach the same end results. The Commission, like many aid recipients, seems to be engaged in the game where it accepts some (in its view) marginally useful advice and training in return for potential access to investment in its plant, equipment, and bureaucratic power. This might simply be about short-term gain. Or, it could indicate a more sustained effort to build up the JACC’s capability and authority in a manner not fully consistent with the project design (see below).

The Project Board, although able to ensure the routine flow of resources and activities, proved less capable in dealing with strategic decisions. In a context of differing views and interests among the principals (JACC, MOPIC, UNDP), and with a project only loosely defined, the Board could not bring sustained consensus and focus on the project objectives as designed. The JACC is, of course, within its rights to refuse to carry out decisions of the Project Board, but its doing so nonetheless represents a failure of coordination.

*National Execution*

The other important aspect of project management in this context is the National Execution modality that was employed. Following the Paris Declaration, this approach places primary responsibility for project implementation with an entity in the host country – in this case, the JACC. Key decisions were to be made by a Project Board comprised of representatives of UNDP, the JACC, and the coordinating ministry, MoPIC. Various responsibilities were allocated between the parties, with UNDP in charge of Project Assurance (monitoring outputs and timetable), and JACC carrying out procurement.

Conflicts arose in areas of shared responsibility – not only strategic program decisions and project component changes taken in the Project Board, but also expenditure and recruitment. UNDP was designated the budget holder. The HACT framework required it to make periodic payments to the JACC based on vouchers backed up by justification in the project documentation. This provoked an early struggle, with the JACC demanding sole signature authority, and the PM asserting the UN’s authority to set up payment systems and criteria. The JACC seemed to feel this was contrary to its expectations, and there were arguments over invoices for much of the project period. As for recruitment, the JACC preferred local over international consultants – and this became a more pressing issue when the rates paid to these consultants leaked out and caused a furor.

Was National Execution the correct modality in this case? The relevant UNDP policy document (UNDP 2010) explains the alternative as follows:

[T]he Direct Execution Modality (DEX) is applied where, “based on the financial rules and regulations (FRR), the Administrator may select UNDP as executing entity only when it can be demonstrated that such a step is essential to safeguard the full responsibility and accountability of the Administrator for the effective delivery of UNDP programme activities.”

This statement sets a high bar for recourse to the DEX approach, but the experiences just discussed suggest that the standard may have been met in this case.

1. Project design***:* Was the design based on a proper analysis of the context and needs, clear objectives and strategy, baselines or benchmarks for performance?**

The project design faithfully adhered to the requirements of UNCAC, the National Anti-Corruption Strategy (NACS), and good international practice. But, in the context, it was unrealistic and unsuited to achieve practical results in a limited time frame.

The core objective in the design was to assist the JACC in implementing the NACS. The Action Plan for implementing the NACS proposed six areas of action with a large number of sub-components and actions to be taken. Most of the interviewees who discussed the Plan considered it unrealistically ambitious. For an agency focused on law enforcement and striving to gain traction and legitimacy in fighting corruption to carry out the whole program in just a few years would be impossible without extraordinary effort. The latter, in turn, would have required a high level of consensus, organization, focus, and discipline – all of which were lacking. This would be extremely difficult to rectify by means of a UNDP program amounting to just under a third of a million U.S. dollars over two years, implemented by a small country staff and a Project Manager working with very limited support. This last difficulty was further compounded by the political situation in Jordan, including a change in government and in the JACC Board, and the lack of consensus on the project agenda within both the JACC and the Project Board.

*Analysis of Needs, Strategy, Objectives*

The Project Document emerged from a two-day workshop involving JACC and UNDP. All concerned acknowledged that the design was loosely framed and not based on a rigorous analysis of problems and needs. As suggested above, the design did reflect the judgment of knowledgeable people in the JACC and UNDP as to the support needed to build JACC capacity and implement the NACS – and this judgment did follow good international practice. But, lacking careful analysis and prioritization, the design was little more than a “menu” of desired assistance, a starting point, rather than a finished design providing a clear two-year roadmap for development.

A careful assessment of objectives, problems, incentives, and needs should have been done in order to give the design a sharper focus and greater realism. The JACC and other stakeholders should have been involved in conducting and reviewing the needs assessment, and a consensus reached about the project plan. The project objectives should have been subject to much more stringent prioritization so that the limited UNDP resources could have been used, realistically, for a limited set of strategic objectives. Last, there should have been a much higher bar set for project planning, so that an agreed roadmap with specific milestones and a realistic progression of achievements could have been defined to guide the project.

As it happened, these things were not done, with the result that UNDP and the Project Manager had to engage in “quick and dirty” project planning at the time of implementation, at the same time bargaining with JACC over study tours, local consultants, software, and the like. Meeting all of the above requirements might well have proven impossible anyway. In that case, UNDP should have been ready to cancel the project or to defer it until it could be properly prepared.

We mentioned above that the objectives of the project, as described in the “Expected Outputs” parts of the Project Document, seem reasonably chosen to advance the NACS and meet the requirements of UNCAC. However, it is less clear that these outputs are the best ones to advance the intermediate goal of building JACC’s capacity, or the higher-level objective of advancing good governance in accordance with the Millennium Declaration. There is neither a contextual analysis nor a strategy discussion showing that the project outputs would address the actual binding constraints to JACC’s effectiveness such as weaknesses in the civil service system, limitations to JACC’s authority, and political constraints – or that the JACC had the capacity to take on the project and benefit from it. Further, no analysis is provided to justify the assumption that increasing JACC’s capacity would advance good governance more broadly – rather than divert resources from more worthy activities, for example.

*Activities and Indicators*

In principle, the activities identified in the Project Document support the “Expected Outputs.” In practice, some of the outputs were produced and followed up, while others were not (see Annex 3 for more detail). In the case of Output 5, on internal audit units, an unanticipated change required cancellation of the activities. This kind of result is often unavoidable. By contrast, the prevention guidelines (Output 4) were deferred in favor of sectoral studies. This is probably the right outcome, but it cost the project many months of delay, and this delay could have been avoided if the project had been prepared appropriately, based on an analysis of needs and problems.

As for the baselines and indicators, these are essentially before/after measures indicating whether a project component was completed or not. A more meaningful approach to indicators would look to changes in JACC’s performance linked to the project outputs. In the context of complaints, for example, useful indicators could include the use of a complaints-handling system, the promptness of response or referral, or improvement in the documentation of steps in the process. In order to use performance indicators, a project such as this requires information transparency on the part of the partner agency.

In the case of the JACC, there is only limited transparency. The Commission’s reluctance to share information is apparent in its release of only summary data – not detailed information – on its budget and expenditures[[6]](#footnote-6); its complaints received and the treatment of them; its investigations, prosecutions, and funds recovered; and its progress on the targets defined in the National Anti-Corruption Action Plan. Concerning project outputs, the JACC has, for example, released only a summary of its UNCAC gap analysis reports on its website. The full report is not available to UNDP or the public. This makes it difficult to interpret the performance of JACC and the project in this area – not only the quality of the report but also the basis of the amendments eventually adopted to the JACC law. Those amendments focus on law enforcement functions, although a quick comparison of the law to UNCAC suggests the need for other changes dealing with prevention. Without more information, we cannot judge what exactly this means.

1. Relevance and appropriateness***:* Was the project relevant and appropriate to national goals, the JACC’s mandate and functions, and the UNDP’s objectives?**

As designed at least, the project was focused on relevant issues important to development and enhanced governance in Jordan, and to the success of the JACC. The Commission is a lead agency in securing public integrity in Jordan, and it clearly had need for technical and capacity-building assistance. It is also clear that the project fit with the mandates of UNDP and the Jordanian Government for the same reasons. In this sense, the choice of overall focus, as well as of project components and outputs was relevant and appropriate.

But this finding needs major qualification. The project as designed and implemented did not fit well with the social, political, and bureaucratic realities on the ground. Again, in principle, the project targets and the flexibility to adjust the design were sensible. In practice, the project and its implementation context provided the JACC opportunities to pursue its own strengthening in ways that were inconsistent with the project’s intent.

*JACC’s Functions*

Under the project, UNDP undertook to support JACC’s implementation of the NACS, and to build the Commission’s capacity to that end. The project design covers several areas, though the emphasis is placed less on repression of corruption through law enforcement (investigation procedures) than on other areas related to outreach and prevention (complaints handling, communication and education, internal audit, prevention guidelines and studies, UNCAC implementation). Key figures at the JACC acknowledged that these latter areas were points of relative weakness calling for technical assistance and capacity-building. In the areas of law enforcement under the Commission’s responsibility, the situation was different. The JACC and its leaders already had significant experience there, and the Commission is itself built upon the capacities of its predecessor agency, essentially a law enforcement mechanism with security and intelligence dimensions. Within this domain, the JACC saw the need for improved capabilities in the relatively new areas of asset-recovery and tracing, and mutual legal assistance.

As implemented, the project had a different emphasis. Activities under the Prevention component (Output 4) were among the very first carried out by the project, and the work in these and related areas continued throughout the two years of the project. But as the project got underway, these aspects of the project – by design the majority of planned outputs – assumed a lower priority as compared with investigation and enforcement. The JACC appears to have determined that the project should serve its ambition to become an elite law enforcement agency. To be clear, it is far from unprecedented in global development experience for a counterpart agency to shape a project to its own ends. It seems that a focus on outreach and prevention did not fit the law enforcement template of the JACC Board or the likely political imperative of government showcasing its enforcement efforts. The shift in priorities also reflects the dynamics of the project’s governance, with the Project Manager needing to satisfy strong preferences expressed by the JACC and Project Board members. The responsibility was equally on UNDP to push back so that the project could unfold in a way more consistent with its original objectives.

As a result, not only were the project strategy and focus further diluted – indeed changed – but the limited resources of the project were further stretched as JACC pressed its demands for capital investments in enforcement and for study tours. To make the additional enforcement capabilities effective would have required a still greater investment of funds.[[7]](#footnote-7)

We can cite as an example the project component on UNCAC compliance (Output 2), involving a gap analysis and legislative amendments. The resulting 2012 amendments to the JACC Law deal entirely with law enforcement, covering such matters as referral to the courts, international legal assistance, investigations, witness and whistle-blower protection, and penalties. No amendments were adopted on prevention, public awareness, or civic engagement. In the latter areas, the language of UNCAC is much more specific than the provisions of the JACC Law, identifying preventive measures in the fields of public sector and procurement reform, transparency and public reporting, and integrity in the judiciary and private sector. As the lead agency for the implementation of UNCAC, the National Anti-Corruption Strategy, and the UNDP project, all of which emphasize prevention and public engagement, the JACC would be expected to address all of the above areas. It appears, instead, to have pursued a narrower strategy of enhancing its powers as a law enforcement agency.

*Wider National Goals*

In the broader perspective, the question arises whether the goals of corruption suppression, prevention, and awareness are best served by a project focused exclusively on the JACC. The project design recognizes that both UNCAC and the NACS require a coherent anti-corruption effort involving not only law enforcement capabilities but prevention, communication, research, coordination, and others. The JACC and other agencies are pursuing investigation and prosecution. What had not yet been developed at the time of project preparation was the further cluster of capabilities dealing with research studies, prevention, awareness, and communication. In all of these areas, multiple institutions are at work. Typically, the overlap of responsibility is greatest in the fields of investigation and enforcement, since entities such as the JACC are normally set up in parallel to other agencies – to focus resources, enhance independence, etc. There is less likely to be overlap in the prevention and outreach areas.

UNDP’s decision to work exclusively with the JACC foreclosed other options, i.e. the possibility of working also with parallel organizations that do some of same work as JACC. For example, the Ombudsman has an overlapping responsibility to deal with all instances of maladministration, including corruption and other lapses in public integrity. It has a constitutional mandate to pursue complaints and cases of waste, abuse, corruption, and other forms of malpractice by public servants affecting citizen welfare and the use of public funds. The Ombudsman has a complaints-handling system and a research department, and it discloses its expenditures and its data on the handling of complaints and cases. It does this with a budget amounting to about one-quarter of the JACC’s, and about two-thirds the number of employees (half of whom are seconded).

This is not to suggest that the Ombudsman is a substitute for the JACC – it is quite different since it depends largely on moral suasion and has no law enforcement role or powers. Nevertheless, it does cover some of the same ground as JACC and could be considered a potential partner. The advantage of involving a parallel agency of this kind is for UNDP to avoid the problems of “counterpart monopoly,” in which the imperative of carrying out a particular type of project, and the lack of alternative partners, leaves the donor agency dependent on the will of a particular agency.

A wider assessment and design effort at the start might have revealed areas where support could more effectively be provided to other agencies, or better coordination could be built. Indeed, a report by one of the project’s consultants (Hicks 2012) lamented the prevalence of “silo-working” over inter-agency cooperation. Also, the prosecutors working on secondment to the JACC have expressed interest in training provided by the project – a reminder that capacity-building in this field is needed beyond the confines of JACC staff.

*UNDP Objectives*

The same underlying question applies to UNDP’s interests: Did the project’s focus on selected capacities of the JACC serve the overall objectives better than a different focus? The UN’s high-level goals are stated as follows in the Project Document:

**UNDAF Outcome(s):** Good Governance mechanisms and practices established towards poverty reduction, protection of human rights and gender equality in accordance with Millennium Declaration.

**Expected CP Outcome(s):** Strengthened institutions, systems and processes to promote, coordinate and implement pro-poor gender sensitive national development objectives based on good governance principles.

Since the prior analysis of the context and project options was not done, it is difficult to say whether the project was the most relevant and appropriate one for these objectives. Whether the project contributes to poverty reduction depends upon the nature of the constraint that corruption poses to economic opportunity, growth, and livelihoods. Experience suggests that corruption does pose such a constraint at several levels including small business, access to markets, competition, and public goods such as infrastructure and social safety nets. But the analysis of this nexus has not been done, nor are there relevant indicators for project impact.

As for human rights, international experience suggests that an entity such as the JACC is as likely to pose a *threat* to these rights as it is to help secure them. This is especially true where the main thrust is to build capacities for intelligence, investigation, and enforcement that could be turned on dissenters and political opponents. No anti-corruption agency is perfect, and its establishment always involves risks and trade-offs.

The situation as regards gender equality is much the same. In principle, lower corruption is associated with greater equity and transparency in such areas as education, employment, and business opportunities. This dynamic favors gender equality. Again, there is no analysis of this connection in the present instance, and so any advancement is purely in the abstract. The project has reported data on female participation in its activities – a recognition of the gender objective in a small way.

1. Effectiveness and efficiency***:* Were outputs achieved in a timely and efficient way? Did the project deal effectively with problems, risks, and failures?**

The record here is mixed. On the one hand, the project delivered a significant number of activities including training seminars, study tours, component strategies and plans, technical assistance reports, and public outreach efforts. Also, the joint design and implementation of the project prompted debate, adjustment, and learning. On the other hand, most of the outputs were either delayed, shelved, not implemented, or not made public. Nor did the project deal very effectively with problems. (For more detail on achievement of outputs, see Annex 3).

*Delivery of Outputs*

The project’s records report most of the outputs as having been fulfilled. It is certainly true that there has been significant effort and a number of important results on all Outputs but one (Output 5). These include the UNCAC gap analysis (completed and followed-up but not made public), the complaints and investigation procedures (proposed but not implemented), prevention guidelines (deferred in favor of sector studies), and the communications strategy (presented but not implemented).

As is evident, there were setbacks in most areas. These were due to a variety of factors including lack of clarity in the project plan, disagreements in the JACC Board and the Project Board, and external changes that required shifting project components. The implementation delays began at project inception. UNDP reported that some six months or more after the DGTTF grant for the project was awarded in early 2009, there was still no action being taken to implement it. The Project Director did not come on board until mid-2010, and she struggled for months with little progress until the new JACC Board took over and began to be more cooperative. Further, some of the activities that were eventually carried out were either *ad hoc* and not well thought-out (e.g. JACC brochures), or were not sufficiently structured or followed up in order to maximize their practical benefit (e.g. trainings and study tours).

An example of this mixed experience is provided by the prevention component (Output 4). The JACC, by its own account and the terms of the NACS, places high priority on prevention. Thus, not only does the Commission raise awareness, but it is charged with conducting studies on corruption risk including reviews of policies, laws, and administrative structures. One of the first project activities was a regional expert meeting on prevention, attended by the PM and two JACC members. In that meeting, the sectoral approach was identified as the most effective means of launching the prevention component – by means of a pilot study. The project then spent months in identifying the researcher for the first study, and so the preventive sector studies got off to a late start. By the end of the UNDP project span, some sectors had been selected for study, an analysis of integrity risk in an aspect of health care administration (medical procurement) was nearing completion, and further studies on the construction sector (contractual change orders in government projects) and tax administration were being identified.

The Prevention Department reported that the health sector study produced specific recommendations to the Prime Minister, with input from the Ministry of Health, that are under consideration. An English-language version of the report was provided to the consultant, and JACC has said it intends to publish the study once its recommendations are adopted. Some difficulty arose due to the apparent resistance by the Ministry of Health, and perhaps other ministries, to the prospect of risk assessments being done in their areas of responsibility. This is understandable, but it is also something that should have been addressed and overcome in advance by the JACC and the Prime Minister. It is possible that Jordan’s political dynamics did not permit such a resolution at the time.

Meanwhile, the corruption prevention guidelines envisioned in the project design have not been produced, as the Board decided to defer their production in favor of sector studies. It is not fully clear why guidelines and studies were considered mutually exclusive, although it would be reasonable to conduct some pilot studies in order to flesh out the guidelines – and the delay in conducting the studies would have pushed back the production of guidelines. The project would have done better to make this reasoning explicit, and indeed to have included it in an initial analysis at the time of project design.

*Use of Resources*

It was mentioned above that the project’s financial resources, including the original budget and funds added later by UNDP, amounted to some U.S. $325,000 over two years. In addition, the JACC’s own personnel, space, equipment, and financial resources were deployed alongside the UN resources, thus amplifying the resource commitment. Other donors such as the U.S. Government provided additional support to specific project activities. The Project Board, at the JACC’s initiative, made some further adjustments in resource allocation, for example using much less-expensive local and regional consultants in preference to expatriates, and putting additional resources into such activities as study tours. Thus, the project effectively leveraged its resources, obtaining additional funds, using JACC’s own resources, and saving or reprogramming funds.

This resource mobilization can have a downside. As one of the project consultant reports noted (Doig 2011):

While the willingness of both [embassies and donors] to support the work of the JACC is commendable, experience suggests that too much support, provided too quickly, in an uncoordinated way, using consultants from different backgrounds and agencies (and length of time away from their relevant practitioner experience), does not build capacity or transfer competences in a sustainable manner.

The question, then, is whether the sum total of resources from UNDP and other sources effectively advanced the objectives of the project. By one measure, the answer is yes: outputs were produced, even if not followed-up or released to the public. A measure of performance would be more meaningful but is not available. Given the attention to training and study tours, the project might have introduced a rough performance measure by surveying or even testing the participants. In the absence of this, we can look to the reported quality and results of these activities, which were mixed.

*Dealing with Problems*

The Project Document identified the following risks:

* Delay in hiring a project manager
* Delay in holding Board Meetings, and meetings of the coordinating committee.
* Change in Leadership
* Duplication by donors
* Amendments to the procedural laws that govern ACC mandate.

The risk that became one of the biggest problems for the project – conflict among members of the Project Board – is not identified in this list, though it is implied. The project had no effective methods for dispute-resolution or problem-solving, and the necessary support and backup from UNDP country and regional officials – which might have helped maintain progress – were not forthcoming. It is true that the Project Board was tasked with arbitrating differences, but it was not able to gain sufficient consensus to keep the project on track in terms of substantive focus and timetable. The various delays, and the lack of adoption or implementation of outputs by the JACC, are evidence of this. One could argue that outputs approved by the Project Board are no more than proposals whose acceptance by the JACC cannot be controlled by the project. But this is true in only a limited sense. The JACC represents its views on the Project Board, and would normally be expected to implement what it has already approved. This disconnect shows that the project in fact did not deal very effectively with the risks and setbacks.

1. Impact and sustainability***:* Did the project activities lead to local ownership, capacity-building, and other benefits that will accrue beyond the life of the project itself?**

It is difficult to discern any sustainable impacts of the project at this time, although some of the training appears to have been beneficial. Other potential impacts in such areas as UNCAC-compliant legislation, complaints and investigation procedures, prevention studies and guidelines, and the communications strategy will depend on follow-up action by the JACC.

*Capacity*

The main outcome of capacity-building by the project seems to have been to bolster the JACC’s efforts to strengthen its law enforcement capabilities. This does not exactly match the objectives laid out in the project design, but it is nevertheless a benefit that may prove sustainable. Some of this benefit came in the form of individual capacities increased through training and study tours. At the level of the institution, there were some studies and strategies that could have an impact if and when they are implemented (e.g. complaints-handling and investigative procedures).

The Information (Intelligence) and Investigation Department described its goal as reaching the point where it can do high-level investigations. The Commission also pointed out that the training fit with its broader effort to create a “legal umbrella” for the recovery of proceeds from corruption and financial crime, in cooperation with the Ministry of Justice. The need for this was also emphasized by one of the project consultant reports (Hicks 2012). The capacity-building agenda in the investigations area was framed by the needs assessment done early in 2011, which guided subsequent project activities in this field.

Corruption investigation requires a range of specialized skill-sets. The JACC needs access to experts in such areas as accounting and audit, computer science, engineering, and finance. Another consultant report (Doig 2011) describes the needs here in terms of understanding corporate documentation, conducting financial investigations, applying criminal investigation procedures to corruption crimes, prioritizing cases to be pursued, and cooperating with other branches of government.

UNDP provided some training in some of these areas, but JACC has not yet hired or retained experts in the necessary specialized fields. The Commission has, on the other hand, taken steps to acquire its own computer forensics lab. The Board determined that the JACC should have its own lab rather than make use of an existing police lab, as suggested by an external expert. The project design also calls for analysis and strengthening of JACC’s complaints handling system. The U.S. Embassy provided technical input here, assisting the local consultants retained by the project.

In addition, senior officials including Board members improved their knowledge of anti-corruption approaches by participating in study-tours. These were not envisioned as such in the original project design, but the Project Board secured the necessary change in the project budget. The JACC Board especially appreciated the opportunity, in effect, to do its own information-gathering abroad. Study-tour participants seem especially to have appreciated the visit to the JACC’s sister agency in Malaysia.

The project’s capacity-building for the investigations function did not satisfy all needs. Some interviewees felt the training was too basic and called for more advanced material and more focused and intensive sessions. Others considered the investigators as having inadequate skills and producing defective case files that had to be re-done or rejected. The UN-supported training on financial investigations, given by a British consultant, took place at the very end of the project – a result in part of the late discovery that funds were left in the budget and could be used. (There was some cost-sharing by the JACC, as well as in-kind contributions by the British and French governments.) As for the study tours, there appears to have been no meaningful follow-up either planned or carried out in most cases, and questions inevitably arose about the JACC’s selection of those who went on the study tours.

*Partnership, Ownership*

The hoped-for national ownership, usually considered the best guarantor of sustainability, did not emerge from the National Execution process. The potential strength of the project was its flexibility, allowing for rolling, participatory design, and ownership by the Jordanians. This advantage did become a reality in the limited sense that the JACC Board took an active role in the running of the project, and serious discussions were held about the direction that the project would take. On the other hand, the pre-selected project components, together with the financial arrangements and UNDP’s overall framework and procedures for project implementation, gave the JACC the impression that its responsibility and ownership were in fact limited.

The result was in a way the worst of both worlds: little sense of ownership and responsibility by the Jordanian side, and little control or imposition of accountability by the UNDP side. Instead of a collaborative effort, the project appears to have devolved in many instances into a series of conflicts and arguments. In these situations, the JACC engaged in a kind of institutionally-driven rent-seeking – not in the sense of corruption, but in the sense of squeezing resources out of UNDP to serve its interests in ways not wholly consistent with the project. Meanwhile, UNDP attempted to assert discipline in terms of budgetary control and adherence to the project design.

Moreover, the usual complement of national government ownership – participation by civil society – played little role in the project despite the prominence this is given in UNCAC and the NACS. Civil society involvement appears to have been limited to the conduct of surveys and little else. A wide array of potential avenues for civic involvement, from consultation forums to collaboration on research and NGO or citizen review boards, were not pursued. A few observers from this sector reported having severe difficulty in getting information, responses, and cooperation from the JACC. These are sustainability-enhancing opportunities forgone. One could regard this as an unfortunate loss, or simply another sign that the JACC views its functions largely through the lens of security and law enforcement. On the other hand, a UN document (UNODC undated) reports the JACC having meetings with various civil society associations, journalists, parliamentarians and others. It is possible the criticisms arose from the JACC’s selection of interlocutors, or the episodic nature of these initiatives.

*Institutionalization*

The project has progressed to the point where some of the changes sought are institutionalized or potentially so. Notably, Output 2 resulted in legislative amendments that expand the powers and responsibilities of the Commission – and which the Commission is largely empowered to implement. Most other benefits of the project, including those at the institutional and policy levels, are highly contingent on future actions by the JACC and could easily be reversed. Outputs such as the complaints and investigations procedures await implementation by the Commission. Individual-level benefits, such as knowledge from training and study tours, are not likely to be sustained for very long. Uncertainty arises from the turnover of government personnel and the overall adverse conditions of public service employment. Sustained improvements in personnel capacity will depend on larger-scale institutional change in government employment, political transitions, etc.

Conditions that might have improved sustainability include a more strategically focused design, a larger resource base, a longer-term project, and greater attention paid to consensus and implementation planning. A lack of cooperation among Jordanian Government agencies was also cited as a contributing factor. The JACC has suggested that a broader “National Integrity System” vision, backed up by a cross-governmental committee, might help remedy this in future.

On the other hand, the research suggests (Williams and Doig 2007) that donors often undermine the sustainability of anti-corruption bodies that they support. This happens as a result of excessive or uncertain funding, inappropriate or impractical designs, and the distortion of local effort and resource-flows. The UNDP-JACC project has, at least, avoided most of these pitfalls by means of its flexible design and joint decision-making. This, however, has come at the cost of conflict, delay, and deviation from the project objectives.

# Conclusion

The UNDP-JACC project was a mixed experience. Most of the planned outputs have been completed by the project, even if not implemented or released to the public by the JACC. Conflict, delay, and shifts in emphasis shaped the results, while any impact on the performance of anti-corruption functions is difficult to discern due in part to a lack of transparency and of meaningful indicators.

In a way, UNDP (inadvertently) wrote the Anti-Corruption Commission a “blank check.” The Commission was able to use UN resources to pursue an agenda at odds with key project objectives. This happened because:

* the project was not thoroughly prepared or grounded in detailed needs assessment,
* the design and execution modality were not sufficiently attuned to the political and social realities or the bureaucratic pitfalls of anti-corruption work in the Jordanian context,
* the processes and persons involved in implementation could not restrain the JACC’s moves to amend the plan and budget as it desired, and
* as a result, UNDP and its Jordanian partners failed to ensure the consistency of the project with its original design.

People involved on the UNDP and Jordanian sides have argued that National Execution, the aim of securing local ownership, and the need for flexibility justified the changes and omissions in project implementation. In principle, it is indeed important to give all these factors serious consideration. In practice, however, the stated reasons are not all valid or even internally consistent. The JACC out-maneuvered UNDP, accepting resources designated in large part for preventive and public outreach, and deploying them (indeed, leveraging them) for its own objective of building its law enforcement capabilities. In the abstract, a focus on investigation and enforcement could be perfectly sensible. In reality, this was not the main aim of the project – and there are good reasons why UNDP did not design the project that way. In Jordan as elsewhere, the build-up of law enforcement power in a central anti-corruption agency poses potential risks on several fronts. These include protection of civil liberties, overall effectiveness and legitimacy in the pursuit of governmental integrity, and keeping bureaucratic inefficiency and duplication in check.

Two qualifications are in order here. First, investigation and enforcement are obviously important parts of any anti-corruption effort, and this discussion is not meant to minimize their role. Further, in the Jordanian context, it could indeed be the case that suppression of corruption through law enforcement is critical not only to governmental integrity but to the security of the state in a region awash in threats. It is not our purpose to make a determination on this. However, if all of this is true, and what was most urgently needed was a law enforcement project, UNDP and Jordan would have done much better to design the project as such. Second, no criticism of individuals is intended here. Both the JACC and UNDP have deployed highly qualified and dedicated professionals in this effort. Our comments are directed, rather, to the broader structure, dynamic, and results of the project.

Now, what are the lessons and recommendations can we extract from the experiences reviewed in this report?

1. ***Project design and preparation***

**Lesson:** Thorough project preparation is essential. This must include in-depth assessment of capacity, local context and dynamics, and incentives. Before a project can begin, it requires specific short- and medium-term plans that provide an agreed roadmap for implementation steps by all partners involved.

**Recommendation:** Future projects, especially in this context and with a National Execution modality, should be based on the kind of analysis just suggested. It is not sufficient to rely on a locally-generated structure such as the National Anti-Corruption Strategy and Action Plan without ensuring that it is sufficiently limited, focused, and operationally clear. For the JACC, it would make sense to revise the Action Plan to make it more realistic and to give it a clearer order of priority and sequence.

1. ***Scale, resources, focus***

**Lesson:** A project aimed at building the capacity of a major institution such as JACC needs financial, personnel, and other resources of a scale befitting the objectives, and a sharply-defined strategic focus, in order to succeed.

**Recommendation:** Not only must any future project of this kind be carefully planned and focused, but priority-setting and budget planning need to be more hard-nosed. In the Jordanian context especially, a critical mass of funding and expert personnel are needed to carry enough weight to succeed in influencing the partner agency. This means more attention from senior levels at UNDP, and a more seasoned expert managing the project – and therefore able to be a strong interlocutor with the JACC. On both the UNDP and JACC sides, it would also make sense to leverage more external resources (within Jordan), for example, by encouraging other government departments, universities and independent institutes, and international development donor agencies to participate (and contribute).[[8]](#footnote-8) It is also important to weigh carefully – and often resist – implementing partner requests to reprogram funds in ways that dilute the focus and impact of project resources.

1. ***Monitoring and follow-up***

**Lesson:** The combination of National Execution with a focus on capacity-building creates a critical need for oversight and follow-through. On the one hand, project managers and implementing partner staff need to stay on track with project objectives and plans, and this requires monitoring, back-up, and sometimes intervention by senior levels at UNDP. On the other hand, capacity-building activities can easily fritter away project resources unless they are tied to substantive project objectives in the form of plans, requirements, reporting, and follow-up.

**Recommendation:** Any project of this kind will need strong back-stopping and monitoring by the UNDP country office. The project manager and consultants need the visible support of UNDP in order to engage effectively with the partner, to advance the project objectives, and to ensure that the broader interests of the host country and UNDP are well-served. In terms of training and study tours, these should be planned so that they meet specific milestones for project objectives, and are measured or assessed on that basis. Alternatives such as the retention of external mentors should be considered. There should be well-defined outcomes envisioned in the activity designs, for example papers, presentations, and/or guidelines to be produced as part of a substantive project component – e.g. asset-tracing or complaints handling.

1. ***Execution modality and governance***

**Lesson:** National Execution can be productive even when it involves conflict, so long as agreed project objectives are seriously pursued. But it requires cohesion and discipline. In the context of this project, there appears to have been too little consensus on the direction of the JACC, too much slack in the project design, a disconnect between the Project Board’s decisions and JACC’s follow-up, and insufficient push-back by the UNDP implementers to keep the project on track.

**Recommendation:** Any project in this area in the near future should be done via Direct Execution. At such point as the JACC Board (and MoPIC) achieve consensus and a coherent, realistic plan for building a well-defined set of anti-corruption capabilities that UNDP can support, then National Execution could be considered. In the latter case especially, the project would need a governance structure that more effectively monitors progress, ensures the integrity of the project as designed, imposes accountability, and achieves open and lasting resolution of disputes. In either modality, UNDP must retain and be ready to use the authority to “pull the plug” and shut down the project when plans are ignored or progress is insufficient. An alternative might be a hybrid of National and Direct methods – i.e. participatory planning, but with specific agreed outputs, timetables, follow-up, and sanctions. Another useful feature would be to have partnerships with additional agencies besides the JACC, to facilitate anti-corruption cooperation government-wide and avoid giving monopoly power to a single counterpart institution.

1. ***Transparency and accountability***

**Lesson:**  Governments often undercut their own credibility and “soft power” (as well as their capacity to benefit from external assistance) by being too secretive. This is especially true for agencies rooted in the security and law enforcement establishments. But experience in Jordan and elsewhere points to the practical utility (and consistency with good governance principles) of anti-corruption agencies ensuring that they are transparent and accountable. Thus, the JACC could probably gain more trust and cooperation from the public, as well as enhance its performance management, by being more transparent.

**Recommendation:** The regular, prompt publication of detailed data on JACC performance should be a fundamental condition of UNDP assistance, as well as a core principle of the JACC Law and organic regulations. This information should cover all relevant metrics – complaint handling, case intake and progress, referrals, prosecutions, sanctions, production and reception of policy proposals and analytical studies on prevention, surveys of public experience and perception of JACC, etc. UNDP should consider working with the JACC to develop performance metrics and use the data just mentioned for measurement. One early step that can be taken is to post the outputs of this project, including the health sector study, UNCAC gap analysis study, and others on the JACC’s public website. Further, UNDP and JACC should seriously consider, as part of any future project, the establishment of a citizen review board similar to the ones used in Hong Kong. The board should include representation by civic groups, NGOs, the professions, academia, traditional authorities, and other social institutions. Also, accountability would be better served if the project design clearly defined the evaluation criteria, metrics, and information base in advance.

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# Annex 1: Project Design

In supporting the JACC in its implementation of the National Strategy, the UNDP project targets the following outputs (UNDP 2010):

**Output 1:** Management arrangements established and maintained for the duration of the project.

**Output 2:** Jordan’s compliance with UNCAC requirements to strengthen AC legislation reviewed and assessed.

* Report on UNCAC compatibility and gap analysis.
* Report on operationalization of national AC strategy and action plan in relation to the UNCAC.
* Report on incorporating AC principles in service delivery.

**Output 3:** Adequate mechanism for processing of complaints, investigation procedures developed.

* Evaluation report on current investigation and complaints mechanisms needs at ACC
* New strengthened mechanisms established for investigation and complaints

**Output 4:** Corruption risk management and preventive anti-corruption guidelines developed.

* Prevention guidelines drafted.
* Guidelines approved by ACC.

**Output 5:** The role and function of the internal monitoring units within the ministries and government’s institutions strengthened.

* Workshop and training of the monitoring units is conducted.
* Monitoring functions clearly defined and documented
* Evaluation report of the workshop is conducted.

**Output 6:** Advocacy, awareness and outreach strategy developed.

* Document outlining the communication strategy for ACC units
* Document approved by ACC board.

The Project Document identifies the roles of key players in the project. The JACC is responsible for the production of outputs of the project, realizing the goals of the project, and ensuring the best utilization of resources. The Commission is accountable to the government coordinating authority (MoPIC) and to UNDP. UNDP and JACC are jointly responsible for the recruitment and contracting of all staff to be hired for this project, including the technical advisors/ consultants, through competitive recruitment processes. UNDP is to assist the JACC to build partnerships, coordinate between the various parties involved, obtain knowledge from global sources and experiences, and raise funds. UNDP will also provide overall policy and technical advice, and training in project management. UNDP is designated the overall “budget holder” under the National Execution modality. The latter includescontrolling expenditures, ensuring adequate financial management, and handling all necessary financial arrangements, processes, request for authorizations, and payments. A Project Board and Project Coordination Committee are envisioned, the former serving as a decision forum for the key players (JACC, UNDP, MoPIC) and the latter coordinating with other donors.

# Annex 2: Project Context

The JACC began its operations and launched its strategy amid raised expectations, due in large part to the King’s public show of support – a signal that the public should take the Commission’s work seriously. The staff and leadership of the JACC seem to have inspired some confidence as well, with a cadre of relatively well-qualified and -paid professionals under experienced leadership. The appointment of Mr. Bino placed at the head of the organization a seasoned official with expertise in security and anti-corruption. Indeed, the continuity of the JACC’s investigative function with the efforts of its predecessor agency over the prior decade suggests that the Commission is not writing on a blank slate but building on past experience. In light of the Commission’s press briefings and its efforts on major cases such as the Phospates and Muwarid investigations, and as a consequence of political change and increased openness, some observers suggest that many forms of blatant corruption are no longer acceptable – and are indeed decreasing – in Jordan. Commissioners suggest that their efforts have generally halted the momentum of corruption across the society, as recognized by a number of traditional authorities who thanked the JACC for its work.

These positive trends, however, coexist with a range of negatives. The JACC suffers constraints to its power, resources, capacity, and credibility. It has faced the necessity of learning on the job. Regarding the breadth of its powers, the Commission negotiated changes in its statute that increased its investigative and police powers so that it could freeze and seize assets, and impose travel restrictions. But it cannot gain access to bank accounts. Further, the JACC had hoped to gain the authority to reach settlements on corruption cases, but did not succeed. Prosecutions are further limited by the need for a prior vote of Parliament in the cases of certain high officials. This has not prevented the JACC from proceeding against high-profile suspects such as the former mayor of Amman mayor, and the former head of the *Mukhabarat*.

These constraints to its authority are not uncommon among anti-corruption agencies globally. Some checks on agency powers are necessary to protect the public. Nor must these limitations prove fatal – effective cooperation with other government agencies, with the private sector and civil society can overcome them and in the process enhance the agency’s legitimacy. But such cooperation is not always forthcoming and appears to be a major problem in Jordan, thus limiting JACC’s reach.

Moreover, the JACC lately appears to be hobbled by adverse public perceptions. The high expectations fostered by the Commission’s founding have become a liability, with some members of the public expressing disappointment that it has not jailed senior officials accused of corruption – a power that the JACC has never possessed. Several opinion leaders regard the Commission as lacking legitimacy, as powerless to bring high-level politicians to book, or even as a fig leaf intended to divert attention from the most egregious abuses. Many argue that the JACC lacks political independence, citing the power dynamics in Jordan and the Commission’s administrative position within the purview of the Prime Minister. To the critics, these signs indicate either a lack of serious intent to fight corruption or a preponderant interest, under the rubric of anti-corruption, in warding off certain threats to state security and legitimacy. Lending further support to this view are the Commission’s very limited disclosure of information, its relatively modest results in terms of high officials prosecuted and public funds recovered, and the public disputes and controversies involving members of the JACC Board.

# Annex 3: Project Results

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| **Outputs planned** | **Results reported** | **Discussion** |
| **Output 1**:Management Arrangements established and sustained during the lifetime of the project  **Baseline:** No management arrangement is established.  **Targets year 1:**  Both Project manager and finance and Administrative Assistant recruited.  Report on HACT micro Assessment finalized and reviewed by April 2009.  **Targets year 2:**  Management arrangement sustained through the year 2011  **Indicators year 1**:  -Project manager and Admin and Finance Assistant recruited.  -Advances given to ACC by the third Quarter of ACC.  **Indicators year 2:**  No gaps in staff are present during the course of the project | 1. Project manager was hired with full participation of the ACC board, 2. The Admin fin. Assistant hired 3. Procurement mechanism for hiring consultant was set under the project 4. Purchasing two Laptops and AC for the project, and two digital pens   Gender:   1. A gender balance is achieved in hiring the project team 2. Project staff were oriented about gender equality and gender reporting 3. Project manager encouraged ACC to put gender into perspective | Observers expressed concern that the project had little *ex ante* needs assessment, design, or planning, and relied heavily on the Project Manager to develop the content of the project in consultation with JACC. The PM herself had not been involved in the original design of the project. Since the project was only vaguely sketched out, and an actual assessment of needs and problems had not been carried out, she needed to work with UNDP and JACC to conduct a quick assessment and accordingly to fill in the project outline with content. |
| **Output 2:** The state compatibility with UNCAC to strengthen AC legislations Reviewed and assessed.  **Baseline:** Lack of assessments  **Indicators year 1**:   * Report on UNCAC compatibility and gap analysis. * Report on operationalization of national AC strategy and action plan in relation to the UNCAC. * Report on incorporating AC principles in service delivery.   **Indicators year 2**: Approval of the plan by the ACC board of Commissioners.  **Targets year 1:** Assessment report with recommendations on compatibility with a focus on duplication of mandates, contradictory laws, inconstant mandates, and punishment.  **Targets: year 2** action plan for addressing the recommendations of the gap analysis is approved by ACC. | 1. GAP analysis was conducted and reviewed by the ACC board. Accordingly a list of legislation was identified to be amended. 2. JACC proposed amendments to the JACC law and included some of the gap analysis report in the amended law   Gender:   1. ToR requested to study the impact of AC legislation on gender 2. A study of the impact of AC legislation on gender is prepared | The report on UNCAC conformity is reported to have been completed. The JACC proposed legislative changes based on this gap analysis, and some of its recommendations were adopted in 2012 as amendments to the Anti-Corruption Commission Law (no. 62 of 2006).  However, only a summary of the study appears in the public record (on the JACC website), and UNDP has not been provided the full text. |
| **Output 3:** Adequate mechanism for processing of complaints, investigation procedures developed.  **Baseline:** inadequate and unreliable mechanisms for processing complaints and investigation procedures  **Indicators year 1:**   * Evaluation report on current investigation and complaints mechanisms needs at ACC * New strengthened mechanisms established for investigation and complaints   **Indicators year 2:** plan is implemented according to the agreed time frame  **Targets year 1:**   * Gender addressed throughout the formulation process. * Capacity development plan implemented to strengthen investigation and complaints handling procedures.   **Targets year 2:**  - Adequate mechanisms for processing complaints are established. | 1. Adopting the sectoral approach, starting with the financial sector and in particular the tax revenue 2. 44 staff of ACC from different departments were trained on an intensive course on financial investigation. 3. A structure for a Complaints Handling Division at the Anti Corruption Commission (JACC), is set, that aims at managing and scrutinizing complaints before launching any investigation. 4. A job description for the staff needed in the Complaints Handling Department/ Division prepared 5. A gender-sensitive Complaints mechanism set. 6. Established a complaints section and set the process for complaints handling at JACC.  * An exchange visit with the Commission of Integrity of Iraq was conducted on the Go Case system, funded by UNDP Iraq though the system is not fully operational in Iraq.  1. A ToR prepared for training on asset recovery mutual legal assistance, and sent to American Embassy. 2. A ToR is prepared for an Exchange of Experience visit an anti corruption body (SFO)/ London, to learn about the investigative techniques and the ToR was sent to the British Embassy, also a meeting with the French embassy was conducted to explore ways of cooperation in this regard.   Gender:  Investigation training:   1. A gender balance (50%) is achieved in nominating the trainees 2. A training session on gender issues in particular the following:  * How the law differentiates between men and women in criminal offences * Best time to arrest women suspects * Special needs on how to search women suspects * How to integrate women suspects   Complaints:   1. A gender balance is achieved in hiring the experts 2. A gender balance (50/50) is achieved in hiring the counterparts 3. A gender sensitive complaints structure is accomplished, by having a female officer in the front office to deal with women complaints | Interviewees agreed that the training provided by the project in this area had improved the capacity of JACC investigators. They noted that investigative techniques are improving and that the investigators are increasingly well-qualified, many having graduate degrees, technical training, and increasingly, experience. Areas mentioned as important were financial investigation, asset-tracing and –recovery, the use of electronic databases, and case follow-up. The training included field visits to the UK and France. In addition, senior officials including Board members improved their knowledge of anti-corruption approaches by participating in study-tours. Consultants prepared an analysis proposing a structure for complaint management along with a staffing plan. One of the international consultants also proposed a strategy and work-flow structure for complaints, investigations, and case management. However, the improvements here were not implemented.  Some interviewees felt the training was too basic and called for more advanced material and more focused and intensive sessions. Others considered the investigators as having inadequate skills and producing defective case files that had to be re-done or rejected. The UN-supported training on financial investigations, given by a British consultant, took place at the very end of the project.  The improvements proposed for work-flow, complaints, investigations, and case management were not implemented. |
| **Output 4:** Corruption risk management and preventive anti-corruption guidelines developed.  **Baseline**:prevention guidelines do not exist  **Indicators year 1:**   * Prevention guidelines drafted. * Approved guidelines by ACC.   **Indicators year 2:** evaluation of the implementation by stakeholders  **Targets year 1:**  Anti prevention guidelines are developed in preparation for activities in 2011.  **Targets year 2**: pilot implementation of guidelines | 1. The Project Board in their first meeting on August 19, 2010 decided to postpone this output to year 2011, due to time limitation.   In 2011:   1. Risk/integrity assessment approach is adopted and “The Procurement in the Health Sector” is selected. 2. Capacity of JACC, Ministry of Health, Jordan Supplies Dep., Joint Procurement Dept. staff is improved in defining the risk factors in these areas 3. An exchange of experience visit was conducted to the Montenegrin Authorities on Oct, 10th 2011, to expose the JACC concerned staff to the best practices in the area of risk assessment and awareness, to assist in the work conducted in the health sector, and to strengthen the understanding of the new methodology suggested by UNDP and adopted by JACC in the prevention field.   Gender   1. Gender neutrality is considered in hiring the expert. 2. A gender ratio (40/60) is achieved in hiring the technical committee | The first project intervention was a regional expert meeting on prevention that the project manager and two JACC members attended. In that meeting the sectoral approach was identified as the most effective means to launch the prevention component – by means of a pilot study. UNDP had advertised for the study, but for three months we were unsuccessful in identifying the right person.  Thus, the JACC got a late start on the research studies. At the end of the UNDP project span, some sectors had been selected for study, an analysis of integrity risk in an aspect of health care administration (medical procurement) was nearing completion, and further studies on the construction sector (contractual change orders in government projects) and tax administration were being identified. The Prevention Department reported that the health sector study produced specific recommendations to the Prime Minister, with input from the Ministry of Health, that are under consideration.  The corruption prevention guidelines envisioned in the project design have not been produced, as the Board decided to defer their production in favor of sector studies. A further difficulty was the apparent resistance by the Ministry of Health, and perhaps other ministries, to the prospect of risk assessments being done in their areas of responsibility. |
| **Output 5:** The role and function of the internal monitoring units within the ministries and government’s institutions strengthened.  **Baseline:** Insufficient role of internal monitoring units within the governments in monitoring the process of public procurement.  **Indicators year 1:**   * Workshop and training of the monitoring units is conducted. * Monitoring functions clearly defined and documented * Evaluation report of the workshop is conducted.   **Indicators year 2:** assessment on AC role of internal monitoring units within government conducted with recommendations. This could be in 2010. And indicator I gave for 2010 could be 2011  **Targets year 1:** Improvements in the role of the internal monitoring units.  **Targets year 2:** Improvements in the role of government units. | 1. The Project Board in their first meeting on August 19, 2010 decided to postpone this output to year 2011, due to time limitation 2. In 2011 this output is deleted, as Ministry of Finance and the Audit Bureau are working on it. 3. According to JACC decision this output was reallocated under output 2 to establish a complaints department/ section at JACC 4. The role and function of the internal units is going to be evaluated as part of the Integrity Assessment in the Health Sector. These results will be taken into consideration in developing the anti corruption strategies in the future, as the red flags/ gaps to be solved. | The project was supposed to strengthen and reorganize state internal audit units in order to improve the monitoring of procurements. For this purpose, the Ministry of Finance apparently held training workshops on internal audit.  However, the Project Board put this component of the project on hold, citing structural changes in government that would make this activity less relevant – and it was not implemented The Board agreed that such an intervention is now under the mandate of the audit bureau and not JACC. |
| **Output 6:** Advocacy, awareness and public outreach strategy developed.  **Baseline:** Lack of Communication strategy at ACC  **Indicators year 1:**   * Document outlining the communication strategy for ACC units * Document approved by ACC board.   **Indicators year 2:** Implementation of parts of the communication strategy.  Evaluation report on the implementation of the communication strategy.  **Targets year 1:** Communication strategy approved by the board and ready for implementation in 2011  **Targets year 2:** more clear communication strategy and better branding of the ACC. | 1. An RCC mission was brought in to do a small capacity assessment and develop a TOR for developing a communications strategy for the ACC to hire one international and one local consultant,. 2. Preparation for the international anti corruption day of 2010. 3. Receipt of funds from UNDP HQ to work on radio campaigns on anti corruption, which were completed and report was finalized 4. Capacity of concerned staff on internal and external communication was enhanced through on the job training. 5. Communications Organization Structure prepared and submitted for JACC for review and approval on Oct.5th 2011; the proposal was discussed and comments were proposed form the JACC Board. 6. The Communications Strategy prepared and submitted to JACC for review and approval on Oct.5th 2011 and needs to be amended as proposed by the Board and concerned ACC senior staff. 7. The communication actionplans are prepared and submitted for JACC for review and approval on Oct.5th 2011 Tools for improved and external communications were introduced. 8. On the job training on: Social media, Media, Public relations, Awareness conducted 9. Provided training on Igoogle 10. Developed concept paper on how to tackle amendments of ACC law 11. ACC consensus on the next theme for the anti corruption day was identified; official reply to TAG comments regarding organizational structure of the communications directorate at ACC. 12. Preparation for the International Anti Corruption Day as part of the on Job training 13. Preparation of leaflets, brochures, calendar, flash animation 14. Design of the ACC anti corruption day 15. Production of the publication for the some Intl Anti Corruption day and for JACC used as part of communications.   *Gender*   1. 1-A female communications consultant is hired   2- Gender balance in the on the job training is pursued, but female participation is around 70% | One aspect of awareness was the training of some 2,000 government officials in principles of good governance, conflict of interest standards, and other matters. Outreach to the public took the form of JACC brochures, radio and television programming, discussions with business and youth organizations, and a Facebook page. JACC also developed a teaching unit on corruption and its impact on the community as part of the secondary school social studies curriculum, and plans to produce a compulsory university curriculum as well, working with the Ministry of Education.  The Communications Department and related units of the JACC used several approaches in this area, and took advantage of opportunities to get training in such areas as social media. The JACC Chair received training in dealing with the press and other media, resulting in a noted improvement in the Commission’s press conferences.  The JACC welcomed the opportunity to work on a communications strategy with the local expert supported by UNDP, comparing this approach favorably to other experiences with donor agencies. The consultant engaged JACC staff in brainstorming on components of a communications strategy, surveying their views and incorporating them into the end result. The consultant proposed a multi-pronged strategy for media, internal and external communications, and awareness; developed publications for JACC use; and drafted TORs for restructured JACC departments to deal effectively with these areas.  The Project Manager was reportedly unable to push successfully for adoption and implementation of the consultant’s recommendations, or to achieve clarity on the strategic direction in the area of communications. When senior officials were presented with the strategy, the discussion appears to have been unproductive, and the communications strategy was shelved. A different reason for deferring a decision on the strategy, offered by some at JACC, is that limits on staff, financing, or space made it impractical to move ahead with the strategy for the time being. |

# Annex 4: Interview Schedule for Jordan Visit

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| **Sunday, 5 August 2012** | | |
| 9.00 am | Introductory meeting at UNDP Jordan |  |
| 10.00 am | Introductory meeting with MOF Chairman, Samih Bino, and Board Member Ramzi Nuzha |  |
| 11.00 – 2.00 pm | Meetings with relevant department directors and personnel: Investigation Department, Communication Department |  |
| **Monday, 6 August 2012** | | |
| 9.00 am – 2.00 pm | Meetings at JACC:  Seconded staff from Prosecutor General and Public Security Directorate  Dr Qasem Alzoubi, Prevention Department  Meeting with Hilda Ajeilat, Jordan Transparency Center |  |
| **Tuesday, 7 August 2012** | | |
| 9.00 am – 2.00 pm | Meetings at JACC:  Financial Department  Awareness Department  Board: Ramzi Nuzha  Meeting at UNDP |  |
| **Wednesday, 8 August 2012** | | |
| 9:00 am –4:00 pm | Meetings:  Ombudsman Bureau: Hasan al Shoubaki, Alaedding Armouti  Nermeen Obeidat, Communications Consultant  Tharwat Abzakh, Former Project Manager |  |
| 4.00 pm | Meeting with UNDP |  |
| 9:00 pm | Phone call: Alan Doig, Consultant on Investigations and Complaints Handling |  |
| **Thursday, 9 August 2012** | | |
| 10.00 am  12:00 pm – 4:00 pm  meetings | Debriefing Presentation to present initial findings:  Attendees: JACC and UNDP management and relevant personnel  Jawad Anani, Economic and Social Council  Confidential background interviews |  |

1. For more detail, see Annex \_\_\_ and the Project Document (UNDP 2010). [↑](#footnote-ref-1)
2. UNDP Draft Discussion Paper, “The Process of Moving UNDP Jordan CO Towards Adopting the Paris Declaration Principles on Aid Effectiveness,” June 20, 2010. [↑](#footnote-ref-2)
3. For further discussion of context, see Annex \_\_. [↑](#footnote-ref-3)
4. The JACC’s concern is clearly justified, even if its decisions about local or international consultants were not always correct. [↑](#footnote-ref-4)
5. Indeed, the lack of space in the current building was cited a few times as reason to delay action on certain project components. [↑](#footnote-ref-5)
6. These are summarized in the National Budget Law and the JACC Annual Reports. [↑](#footnote-ref-6)
7. For example, one estimate for the cost of case management upgrades was U.S. $100,000 or more. [↑](#footnote-ref-7)
8. The Economic and Social Council expressed interest in collaborating on prevention studies. [↑](#footnote-ref-8)