Local Administration and Reform Project Mid-Term Evaluation

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ACRONYMS

CC	commune or *sangkat* council
CDRI	Cambodia Development Research Institute
CIP	Commune Investment Plan
CMC	citizen monitoring committee
CPP	Cambodian People's Party
CSO	civil society organization
CTO	cognizant technical officer
DAT	Decentralization Advisory Team
DG	democracy and governance
DIW	District Integration Workshop
EOP	end of project
ExCom	Executive Committee
ISP	intermediate service providers
LAAR	Local Administration and Reform Project
LOP	length of project
MAE	Mainstreaming Anti-Corruption for Equity Project
NGO	non-governmental organization
OA	outreach activity
PADV	Project Against Domestic Violence
PIM	project implementation manual
PLAU	Provincial Local Administration Unit
PNGO	provincial NGO
RFA	Request for Applications
RFA	rapid field appraisal
RGC	Royal Cambodian Government
SDP	social development project
SGA	Strengthening Governance and Accountability Project
SO	strategic objective
TI	Transparency International

MAP OF CAMBODIA

1. EXECUTIVE SUMMARY

Cambodia's "one-plus" party system has displayed steadily decreasing political competitiveness in recent years. There is little that foreign donor assistance can do to reverse this trend. Accordingly, donor strategies need to focus on increasing state accountability and responsiveness. USAID's Strengthening Governance and Accountability (SGA) program, with its two constituent projects, is well positioned to take on this challenge. Local Administration and Reform (LAAR) works closely with 356 lower level local government partners, while Mainstreaming Anti-Corruption for Equity (MAE) creates demand for greater transparency and accountability across the political/administrative system.

Elections of commune and *sangkat* councils are by proportional representation and closed party lists, meaning that parties control nominations, citizens vote only by party, and elected officials represent collective constituencies rather than individual districts. Local politicians' primary allegiances tend to focus upward toward party hierarchies. One of LAAR's principal objectives is to modify this upward bias by establishing sustainable linkages between commune councils (CCs) and local citizens.

USAID's current strategy for Cambodia aims to: *promote more effective, inclusive and accountable management of what should be Cambodia's main assets—its people; its natural resources; its economic potential; and its fledgling democratic institutions.* In addition to objectives in health and education, the mission has a cross cutting strategic objective: *improved political and economic governance.* This objective incorporates a broad swath of mission programs. Two components—Support Democratic Local Governance and Decentralization and Promote and Support Anti-Corruption Reforms—correspond to the LAAR and MAE projects. Both are implemented by Pact, a U.S. NGO under a USAID cooperative agreement referred to as the Strengthening Governance and Accountability program.

USAID's Request for Applications (RFA) in 2005 set the goal for LAAR: *to support the institutionalization of participatory development process and democratic practices at the sub-national governments with a strong focus at the commune level through technical assistance and material support to the commune councils, mobilization of citizen participation in local affairs and strengthening the capacity of NGOs/civil society in monitoring the works of commune councils.* Pact responded to the RFA by proposing significant programming innovations, including: 1) a *development advisory team* (DAT) to monitor project implementation; 2) establishment of *community monitoring committees* (CMCs) to facilitate local communication; and 3) selection of *provincial NGOs* (PNGOs) to serve as implementing partners.

The observations below reflect the judgments of a team with roughly 70 years (collectively) of working in the development field, and professional experience in more than two dozen countries in Asia and elsewhere in the developing world:

Impacts of LAAR—the big picture:
- The LAAR model–working directly with commune councils through PNGOs, emphasizing participation, transparency, and accountability—has been the right approach at the right time.
- LAAR commune councils are different from non-LAAR commune councils—more conscious about participation and accountability, more aware of social issues, and more confident they can serve citizens and deal with officials and NGOs.
- Implementing LAAR in 356 communes seems "about right," enabling Pact to focus on quality while maintaining a significant "footprint" so LAAR can influence national policy.
- LAAR has begun to produce useful policy shifts—acceptance of social development as an appropriate local planning goal, the 40 per cent matching fund requirement, and openness to revising the government project implementation manual—by national, provincial, and district officials.

Pact and the PNGOs:
- Pact currently has the leaders and staff in place to carry LAAR to a successful conclusion and help PNGOs and partner commune councils prepare for the future.
- Pact's strategy of working through PNGOs has ultimately proved effective.
- PNGO personnel appear to be insightful about LAAR goals, proud of specific accomplishments, and aware of challenges.
- Working through PNGOs necessarily required slow start-up and systematic preparation.   But advantages included: Pact did not recruit provincially based staff away from local NGOs; PNGOs' relationships with commune councils and commune residents and knowledge of local governance will be useful post-LAAR; LAAR experience will enhance PNGO skills in implementing virtually all their future activities.

Commune councils and community monitoring committees:
- Councilors feel closer to citizens, largely because of successful outreach activities.
- Councilors feel ownership of LAAR-supported projects; they are different from the "turn key" projects implemented by other donors and NGOs.
- Councils have improved the quality of their planning process and feel better prepared to participate in district integration workshops.
- CMC members have played a useful role in outreach by inviting citizens to consultations.
- It is likely useful that some CMC members attend council meetings but the role of the committees as a "two way bridge for communication" is hard to detect.

Outreach and social development projects (SDPs):
- Introduction of outreach activities in 2007 became a major success factor in LAAR capacity building.
- Outreach as modeled under LAAR can be replicated usefully in full, or modified, or its component parts can be adopted in future decentralized governance initiatives.
- As a result of the SDPs, council members, citizens, and senior Royal Government of Cambodia (RGC) officials now accept social interventions as a legitimate element of commune development--a major success.
- The first generation of SDPs, which emphasized public information campaigns and persuasion, has helped to create new traditions of democratic accountability.

The evaluation team notes that some PNGO partners have potential as purveyors of services—training, coaching, technical guidance—to commune councils and new district and provincial councils. They should be supported in making plans to undertake this new role. A national workshop could help the 14 PNGOs consider what services they have to offer and how they could market those services. Institutions in the Philippines could play a useful role in designing and implementing such a workshop. These include Venture for Fundraising, a group that helps NGOs develop financial sustainability strategies, and the Gerry Roxas Foundation and Holy Name University, both offering training, facilitation, and advisory services to local governments.

The evaluation team recommends that Pact adopt a *modest research agenda* for the project's final year. Suggested studies include:
- *SDP case studies:* Rapid appraisals would be undertaken in about 20 communes to provide insights into how social development activities were designed and implemented, how they succeeded or failed, and assess their efficacy for democracy building and practical problem solving.

- *Comparative study of planning documents:* A comparative assessment of commune planning documents can be undertaken as a desk study. A standard protocol could be used to rate the documents for: clear exposition of problems and goals, responsiveness to citizen needs, gender sensitivity, and probable impact on economic and social development. A sample of about 100 LAAR and 100 non-LAAR communes should be sufficient for valid statistical comparison.
- *Follow-on citizen polling:* Team members recommend Pact to seek expert guidance on getting maximum benefits from the second round of citizen opinion polling.

The team encourages Pact to work with PNGOs to develop and implement a series of *planning-for-sustainability sessions* as a major focus for final year activities:
- Help commune councils develop *minimal-cost outreach strategies:* Local leaders can be supported in critiquing outreach activities undertaken earlier, and brainstorming on "how we can repeat these efforts at minimal cost."
- Help commune councils develop *strategies to sustain ongoing SDPs* and initiate new social development activities with local resources.
- Support community dialogues regarding the future of the CMCs, emphasizing the need to sustain their *functions*, and not necessarily their current organization and membership.

Evaluation team members believe the Social Development Program, as conducted to this point, has succeeded to a substantial degree. SDPs provide a satisfying culmination of the outreach process. For a year or two citizens have the satisfaction of knowing their concerns have been heard and concrete actions taken. But the team is concerned that, over time, many SDPs will fall short of expectations and begin to create a degree of doubt among local citizens. The team urges Pact to consider some possible refinements in implementing the last round of SDPs under LAAR:
- Identify *clusters* of commune councils that plan to work on similar SDP themes, then help them by finding groups that are working effectively on those themes. Borrow extensively from those groups, seeking their expert advice, training and reference materials.
- Develop and deliver a standardized *tool kit* that catalogues concrete, practical responses to the three to five most common themes so far identified by partner communes.
- Develop a revised SDP *planning and implementation methodology* for commune councils that incorporates more focused, productive, realistic interventions, with measurable (or observable) impacts.

2. CONTEXT

2.1 Cambodia's political and social situation

Cambodia's "one-plus" party system has displayed steadily decreasing political competitiveness in recent years, partly owing to the political acumen and effectiveness of the Cambodian People's Party (CPP), partly to the divisiveness and incompetence of opposition parties. Sustained economic growth and reasonable levels of peace and order have further strengthened the credibility of the CPP. There is little that foreign donor assistance and diplomatic jawboning can do to reverse this trend. Accordingly, donor strategies need to focus over the short and middle term on increasing state accountability and responsiveness. Achieving inter-party political competitiveness is not a realistic goal for the present.

USAID's Strengthening Governance and Accountability (SGA) program, with its two constituent projects, is well positioned to promote the democratic virtues of accountability and responsiveness. Local Administration and Reform (LAAR) works closely with 356 commune and *sangkat* partners, while Mainstreaming Anti-Corruption for Equity (MAE) creates demand for greater transparency and accountability across the political/administrative system.

From 2002, when local councils were elected for the first time, to 2009, Cambodia had elected bodies at only two levels: the national parliament and 1,621 local commune or *sangkat* councils (CCs).[1] However, the system will be altered by the May 2009 elections that will provide elected district and provincial councils for the first time. National policy-makers have opted for a cautious, gradualist approach to expanding democratic local governance, and the new councils will be elected indirectly by the 11,000 CC members.

Elections of commune and *sangkat* councils are by proportional representation and closed party lists, meaning that parties control nominations, citizens vote only by party, and elected officials represent collective constituencies rather than individual districts. It follows that local politicians' primary allegiances and accountability tend to focus upward toward party hierarchies, not downward to a citizen base. One of LAAR's principal objectives is to modify this upward bias by establishing sustainable linkages between CCs and their citizen constituencies.

The CPP overwhelmingly dominates the commune council system and can be expected to achieve dominance in all of the new district and provincial councils to be elected in May 2009. In both the 2002 and 2007 council elections, it won more than two-thirds of the seats and control of more than 98 per cent of the CCs across the country. Thus, 1,590 of 1,621 CC chiefs belonged to the CPP after the 2007 election. Opposition parties do receive minor posts. The first deputy slot goes to the party with the second highest number of seats, and the second deputy post is awarded to the party garnering the third highest number of seats. But power in the councils resides with the largest party and in particular with the CC chief. The few councils controlled by other parties face the daunting prospect of dealing with district, provincial, and national offices that are generally under CPP control.

A striking feature of LAAR partner CCs, and of CCs across the country, is the advanced age of their members. During visits with three dozen councils, including about 150 chiefs and ordinary members, evaluation team members estimated that no more than a handful were younger than 45 years old. Many were clearly in their 60s. More than half of current members served on CCs previous to the era of elected commune governments that began in 2002. And perhaps one-fifth of those now serving began their tenure during the Vietnamese occupation of 1979-1987, when highly centralized, communist governance was

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[1] The commune is a rural constituency, while the *sangkat* is an urban neighborhood.

still very much the rule. If years of service are a valid indicator, most CC members can be assumed to *have their feet planted in the non-democratic past.* These figures indicate the scope of the *human* issues, as well as the political and institutional challenges, that Pact and their implementing partners face in making governance more participatory and accountable in LAAR partner communes.

2.2 USAID's Strengthening Governance and Accountability Program

USAID's current strategy for Cambodia, approved late in FY2005, continues through FY2010. It aims to: *promote more effective, inclusive and accountable management of what should be Cambodia's main assets—its people; its natural resources; its economic potential; and its fledgling democratic institutions.*

In addition to objectives in health and education, Mission staff established a new cross cutting strategic objective [SO 3]: *improved political and economic governance.* This objective incorporates a broad swath of mission programs, arrayed in six components. Two components—Natural Resource Management and Private Sector Growth—fall beyond the usual boundaries of democracy and governance programming, but can contribute significantly to democratization in such areas as citizen participation, transparency, accountability, and good governance. Two other components—Improve Justice Sector/Legal Framework and Protect Human Rights and Equal Access to Justice—fall within standard DG programming boundaries; to the extent they are successful, they can contribute significantly to making governance in Cambodia less arbitrary, more humane and, eventually, more democratic.

The two remaining components are Support Democratic Local Governance and Decentralization, and Promote and Support Anti-Corruption Reforms. The implementing mechanism for the local governance component is the Local Administration and Reform project, the subject of this evaluation. The anti-corruption work is undertaken under the Mainstreaming Anti-Corruption for Equity project, which is briefly assessed in Annex D.[2] Both projects are implemented by Pact, a U.S. NGO under a USAID cooperative agreement referred to as the Strengthening Governance and Accountability program.[3]

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[2] English project titles were selected for the efficacious names they produced in Khmer: *Laar* = "good" and *Mae* = "mother."

[3] At the time the strategy was approved, USAID/Cambodia operated under stringent congressional prohibitions against direct collaboration with the Royal Government of Cambodia (RGC). With the elimination of those restrictions in 2007, USAID staff and project implementers have been free to cooperate with government counterparts at the national, provincial, and district levels.

3. THE LOCAL ADMINISTRATION AND REFORM PROJECT

3.1 USAID's Request for Applications and Pact's response

USAID was not the first international donor to provide support to Cambodia's CCs. However, in the opinion of the evaluation team, Mission staff were the first to design a program with real potential to reform both the institutional culture and operational effectiveness of these recently revamped units. In planning LAAR, USAID emphasized the importance of building on activities already supported, e.g., activities undertaken by The Asia Foundation, International Republican Institute, and National Democratic Institute to impart training and encourage dialogue between local leaders and citizens in several dozen communes across the country.

The Request for Applications (RFA), issued in May 2005, set the goal: *to support the institutionalization of participatory development process and democratic practices at the sub-national governments with a strong focus at the commune level through technical assistance and material support to the commune councils, mobilization of citizen participation in local affairs and strengthening the capacity of NGOs/civil society in monitoring the works of commune councils.*

The RFA anticipated direct support to about 500 partner communes, spread across 10 provinces. Five objectives were presented:

- *More citizen participation and acceptance* emphasized establishment of practical mechanisms for ordinary citizens to demand greater transparency and enter into local decision making. One concrete proposal was for establishment of "Commune Councils Resource Centers."[4]
- *Commune council strengthening* envisioned training (and, presumably, coaching) on participatory planning, financial management, promotion of economic development, and inter-commune cooperation.
- A proposed *Social Infrastructure Fund* represented a deliberate effort to expand commune-level development efforts beyond a conventional emphasis on small-scale infrastructure. Suitable projects were to be identified through participatory dialogues with citizens. One major innovation was a requirement that CCs provide 40 per cent counterpart funding for the social projects.
- The *Model Commune Council* objective was a proposal to establish an annual award system to recognize outstanding communes and publicize best practices.[5]
- The *Supporting Overall Decentralization Process* objective represents a commitment to undertake policy advocacy at the national government level, thus ensuring a supportive implementation environment for LAAR, and creating opportunities to share lessons learned under the project with policy makers.

Pact responded to the RFA by proposing some significant innovations. Notable among these were: 1) a *decentralization advisory team* (DAT) to monitor project implementation regularly, identify problems, and recommend solutions; 2) establishment of *community monitoring committees* (CMCs) to be responsible for facilitating communication between commune councils and ordinary citizens and assisting

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[4] The provincial NGOs that Pact used as implementing partners can be regarded as a plausible version of the proposed CC resource centers.
[5] To the best of the knowledge of evaluation team members, no efforts have been made to establish an awards system, and thus this activity will not be discussed again.

councilors in their work; and 3) selection of *provincial NGOs* (PNGOs) to serve as implementing partners.[6]

3.2 Original structure, funding, key indicators of progress, and key changes

Pact's FY2008 annual report summarizes the agreement signed with USAID:

> On September 27, 2005, USAID awarded $14,379,199 to Pact Inc., under Cooperative Agreement no. 442-A-00-05-00007-00, for implementation of the LAAR Program in Cambodia. The LAAR Program focuses on commune councils (CCs) and commune-level civil society groups to enhance local democracies (and by implication local development) through the promotion of good governance in local administrations, building linkages, and increasing public participation in commune planning and the 'Decentralization and De-concentration' process.[7]

The cooperative agreement established an overall goal for LAAR: *Effective, robust, and sustainable engagement between citizens and their elected commune representatives.* The supporting objectives include: 1) Increase democracy and participation at the sub-national level; 2) Build horizontal and vertical links between citizens, local government and national government; and 3) Increase public participation in the Commune Investment Planning and Decentralization and De-concentration process.

Implementation progress under LAAR is tracked, in part, by reporting project activities that contribute to USAID's standard, worldwide indicators for Governing Justly and Democratically. Thus project outreach is reflected in "Number of sub-national government entities receiving USG assistance to improve their performance" and specific training activities are reflected in "Number of individuals who received USG-assisted training, including management skills and fiscal management, to strengthen local government and/or decentralization." Pact also tracks five LAAR-specific performance indicators—e.g., "Percentage of LAAR partner communes, in which citizen attendance at regular CC meetings increases by 5% or more" and "number of CCs conducting Commune Council Performance Assessment on a regular basis."[8]

3.3 Pact's role in managing LAAR

USAID has been significantly involved in monitoring and advising Pact on LAAR implementation since the beginning of the project. That involvement, combined with inputs from the DAT, has been useful and led to several changes in program personnel, approach, and documentation. A USAID cognizant technical officer (CTO) has visited many partner communes and offered useful feedback to Pact.

The USAID RFA indicated that LAAR should be implemented in 500 communes, and Pact's original program design responded to this requirement. However, in 2007, the DAT urged USAID and Pact to decrease the number of target communes in order to improve management. After discussions among USAID, Pact, and the DAT, the target was decreased to 350, and Pact eventually undertook activities in 356 communes. In the judgment of the evaluation team, decreasing the number of communes has enabled Pact to focus on the quality of project implementation, while maintaining a sufficiently large "footprint" so that program successes can be used to influence national policy-making.

Pact's original proposal to USAID defined a methodology of working through PNGOs to provide training, coaching, and technical assistance both to CCs and CMCs. USAID had concerns about the

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[6] All of these innovations—DAT, CMCs, and PNGOs—are discussed in detail below.

[7] In August 2006, the Cooperative Agreement was modified to include Pact's Mainstreaming Anti-Corruption for Equity (MAE) project and the award amount was increased by $4,278,751.

[8] The usefulness of standard and project-specific indicators is discussed below.

approach, fearing it would be inefficient and would dilute the project's intended focus on enhancing the capacity of local government institutions. USAID reviewers envisioned that the implementing agency would hire sufficient personnel to provide support directly to CCs and CMCs from provincial field offices to be established under the project. However, Pact eventually convinced USAID that their approach was sound, that working through PNGO intermediaries would be efficient and cost effective, and would support sustainability by strengthening organizations that can continue to train, coach, and serve commune councils well into the future.

In the judgment of the evaluation team, Pact's strategy of working through PNGOs ultimately has been effective. There are several advantages: 1) Pact did not need to recruit provincially-based staff away from local NGOs or expend funds to establish sub-project offices. 2) Because of their involvement in LAAR, the PNGOs have built strong relationships with CCs and commune residents and have acquired detailed knowledge about Cambodia's local government system, which will be useful to NGO programs and for the work of local councils long after LAAR is completed. 3) The PNGO partners have received LAAR-program training in skill areas—e.g., local outreach and social development programming—that can enhance their other programs in all communities where they work. 4) Most partner PNGOs work in other districts and provinces, potentially supporting expansion of program activities without establishment of additional sub-offices.

We can also assume that there were disadvantages to this approach. Notably: 1) There was necessarily a slow start with field-based activities. 2) The presence of a large number of separate organizations no doubt made it more difficult to ensure coordination with other Pact activities, notably the Mainstreaming Anti-Corruption for Equity project. 3) The necessity of terminating two PNGOs could have been avoided.

To initiate program activities in each province, Pact published newspaper advertisements inviting proposals from PNGOs. A large number of organizations submitted proposals, which were assessed by Pact's LAAR team on the basis of the applicants' legal registration, existing offices in the relevant locations, and demonstrated capacity for work at the community level. Fifteen partner NGOs were selected to work in eight provinces.[9] Currently, the number has been reduced to 13.

The evaluation team met with management staff of four PNGOs in three provinces and observed PNGO field staff in five provinces. Pact managers acknowledge that there have been challenges in implementing the LAAR program through 14 PNGO partners with varying capacities, a theme echoed by at least one other international agency working with NGOs in Cambodia.[10] Nevertheless, LAAR PNGO personnel who met with the evaluation team seemed insightful about the goals of the program, proud of specific accomplishments to date, and aware of current and future challenges.

Working through PNGOs necessarily required systematic preparation over several months in 2006. Pact staff collaborated with two experienced Cambodian training institutions, VBNK and Silaka, to develop a comprehensive training curriculum for PNGO staff. The two partners, together with Pact, then began training staff of the selected PNGOs. Managers and headquarters staff of implementing partners were trained on accounting, administration, and reporting, and more than 120 field staff were trained on the underlying democratic values and specific governance skills essential for effective implementation of LAAR. Field implementation was then initiated as PNGOs offered initial training and coaching to 69 CCs in 2006/2007, and to 161 additional communes in 2007/2008.

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[9] In fact, 15 PNGO partners were selected originally. After financial irregularities were discovered, the agreement with one NGO was terminated. The contract of a second NGO was not renewed in early 2009 due to lax internal controls and alleged financial misconduct by managers.

[10] Interview with personnel of The Asia Foundation in Cambodia.

A first round of grants was awarded to 69 CCs for social development projects to be implemented in 2007. Grants averaged $3,557 per commune, and ranged from $2,322 to $4,997. A major portion of each grant was expended on filing cabinets and a notice board for each village in the commune. The first round of 69 SDPs was undertaken under strong pressure to complete concrete, measurable activities early in the project. There were limited efforts to consult local citizens on their needs and desires before implementing the activities, and after their completion this lack of input was deemed to be a shortcoming. Pact and USAID staff agreed to introduce an intense public outreach process as a preparatory step towards development of future SDPs.

After expansion to 161 additional communes in 2007, an initial round of outreach activity (OA) grants were made to all 230 communes then enrolled in the project. A significant portion of outreach funds for the new partner communes were expended on village notice boards. Financing of notice boards was subsequently dropped from LAAR, a sensible decision in the minds of evaluation team members, since we found little evidence that the boards have been used effectively.

A second round of SDP grants was awarded for 2008/2009 to 230 partner communes.[11] Grants averaged $1,852 and varied in amount from $862 to $3,305, reflecting the ability and willingness of commune councils to make counterpart payments equivalent to 40 per cent of total project cost. Payment of the LAAR project share was made directly to commercial bank accounts established by each partner commune council. A final round of SDP grants was announced to all 356 target communes in October 2008, and in March 2009 all proposed SDPs were under review. The projects will be implemented from mid-2009 into 2010.

While working with VBNK and Silaka to design a training curriculum and methodology for PNGO partners, Pact negotiated simultaneously with the Ministry of Interior to establish mechanisms necessary for program implementation. These included: government authorization for commune councils to access and expend matching funds for social development projects, and permission for councils to establish private bank accounts to receive funds from LAAR. Design of training materials regarding these new procedures had to await their formal approval and release of needed guidance.

3.4 LAAR components—the role of the PNGOs

Pact initially divided responsibility for design of training modules between VBNK and Silaka. The training organizations later requested to divide responsibilities along geographic, rather than thematic, lines, with each organization assigned to meet all training needs of PNGO partners in specific provinces. Pact, VBNK, and Silaka worked together to develop training materials in stages, beginning with a five-day Pre-Module to introduce program concepts and administrative procedures to PNGO personnel in early 2007. Additional training modules were introduced to PNGOs in successive five-day sessions during 2007 and repeated again in 2008. Based on lessons learned from the first round of training and program implementation, Pact and the training institutes amended the training materials and curriculum to address weaknesses and better meet the needs of the PNGOs and commune councils.

Training for the 15 (later 13) PNGOs that became field implementers in the eight program provinces ran to five very full weeks spread over ten months. After the initial round of training, PNGO staff began to work with communes in their respective provinces, training and coaching council and CMC members in turn, then returned to the classroom setting every few months for additional weeks of training.

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[11] The 69 partner communes that were involved in the project from the beginning received support for SDPs in 2006/2007 and 2008/2009, and will receive support for a third round in 2009/2010. Communes involved as part of the "second round" will ultimately receive funding for two successive SDPs, and communes involved only since 2008 will be supported for a single SDP.

In the judgment of the evaluation team, Pact training materials for CCs designed in conjunction with VBNK and Silaka can make a significant contribution to decentralization in Cambodia. The materials cover complex themes regarding democratic decentralization, accountability to citizens, and practical aspects of elected representatives' responsibilities in a manner appropriate for adult learners. The materials could be offered as the main components of a comprehensive training program for all newly elected councilors after the 2012 commune council elections, and the team urges Pact and USAID officials to explore this possibility with Ministry of Interior counterparts.

The central themes of LAAR—democratic accountability and responsiveness to citizens—are novel for most Cambodians. It has been challenging for some Pact national staff, personnel of the training institutes, and PNGO partners to understand program concepts about democratic decentralization fully. This conceptual challenge is another reason that LAAR needed time to develop; the attitudinal changes that are the program's primary impact cannot be imposed or rushed. This process is ongoing.

There is a range of understanding of program goals and themes among PNGO personnel encountered by the evaluation team. One positive indication of PNGO grasp of program concepts is that they were able to describe commune councilors' and citizens' attitudinal changes in terms of specific behaviors. For example, staff of a PNGO in Kompong Cham described in detail how councilors successfully encouraged citizens to participate in monthly CC meetings to provide feedback and advice to the council. On the other hand, the same PNGO reportedly has not applied LAAR program principles to a separately-funded project involving commune governance. The fact that staff of the NGO in another province chose to administer a (non-LAAR) activity without inviting local leaders or citizens to monitor its progress, suggests that that LAAR program concepts have not yet been internalized within the organization or applied practically to other aspects of the PNGO's work.

The PNGOs' role in LAAR is to provide periodic training and ongoing coaching to CCs and community monitoring committees, as well as supporting Pact in monitoring progress of outreach and social development activities. Examples of intensive coaching on implementation procedures include guidance on blending treasury funds and private bank account funds under social development projects. When questioned by evaluation team members, many CC members expressed their intention of duplicating successful LAAR activities. They repeatedly mentioned the sense of accomplishment gained through outreach efforts to identify social development priorities of local citizens. The team believes many CCs are likely to repeat this citizen outreach, particularly if Pact and PNGOs facilitate CCs' planning for one more round of OA, perhaps without financial support, in order to build sustainability into the process.

Commune chiefs and councilors routinely expressed a desire for additional training on the practical topic of financial procedures, indicating that they still feel unsure of their ability to manage outside project funds (e.g., through dual accounts) post-LAAR. In a situation where donors will continue to provide funds to CCs for a variety of activities, and additional functions and fiscal responsibilities may be transferred to CCs under the Organic Law[12], regular updating and reinforcement of financial management skills is important. However, such training will be most useful if it reinforces standardized government accounting norms and processes.

Although they were responsible for monitoring commune-level activities from the beginning of LAAR, initial PNGO efforts in data collection, and Pact's support for them, were weak. This hampered monitoring efforts through the first half of the project. But it appears that improved systems are being put in place under Pact's Monitoring, Evaluation, Reporting, and Learning unit. PNGOs would benefit from

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[12] The "Organic Law on Sub-national Democratic Development" (or the "Organic Law on the Administrative Management of Capital, Provinces, Municipalities, Districts and Khans") is the enabling legislation passed in April 2008 to operationalize democratic decentralization and deconcentration.

additional training (and perhaps from hiring appropriate full-time staff) for meaningful monitoring of project activities. This would enhance the final year of LAAR implementation and also benefit other activities implemented by the PNGOs.

At the beginning, the PNGOs clearly needed extensive training before they could help CCs to launch outreach activities and then guide them through the SDP process. But by now several of them (perhaps not all) have become quite adept at providing the kind of coaching and guidance that CCs need to make a success of the LAAR program. At present they provide these services as part of LAAR, but after the program winds up at the end of FY 2010, their relationship with the CCs will terminate also, as things now stand.

But the CCs will still need some advice and counsel, and hopefully new CCs can be brought into similar programs by the RGC. Could the PNGOs carry on, providing significant services to CCs on their own? Much thought has been given to this very question in other USAID-assisted countries, particularly in Europe and Central Asia. In many countries, as a project enters its final phases, USAID has encouraged and supported select NGOs to set themselves up as "intermediate service providers" (ISPs) on a fee-for-service basis to local governments and other NGOs. And in a number of cases, these service providers have developed a sustainable source of income for themselves from selling their expertise. Of the 13 PNGOs now engaged in LAAR, at least a few should be able to "graduate" into such a role. One way to encourage this kind of activity would be for Pact to provide "vouchers" to CCs for services to be provided by pre-qualified PNGOs on specific topics. Perhaps at end of project (EOP), Pact could certify a select group of PNGOs as ISPs qualified to offer expert advice on specific topics like planning and budgeting, self-monitoring, etc. In any case, USAID as an institution has a deep experience in fostering the development of intermediate service providers, and if Pact does not have a background of its own in this area, it could tap into USAID's store of knowledge on the subject.

3.5 LAAR components—commune council strengthening

The evaluation team met with and interviewed members of 36 commune councils during an intense one-week field trip. Thirty councils were partners in LAAR and six were non-LAAR units. Pact staff helped to arrange 20 meetings with single-CC delegations. In the other cases the team met with members of two or three CCs in joint meetings. In all cases but two the CC chief was present. The number of additional councilors present varied from one to eight. All councils interviewed were controlled by the CPP, though a good number had first or second deputy chiefs belonging to other parties.

Several characteristics of the interviews deserve mention:
- CC chiefs often dominated discussions. On occasion other members initiated comments, but most spoke only when questioned directly by a team member.
- Minority party members were often rather subdued, and generally presented a less prosperous appearance than CPP members.
- Few CC members appeared to be younger than 40 years old, with the vast majority over 45.[13] Their ages, plus the fact that a majority were members in the "first mandate" (i.e., elected in 2002 as well as 2007), suggests they have been in politics a long time. Indeed many belong to an age cohort that got their start in local public life during the Vietnamese occupation, and has dominated local governance ever since.[14] The implication is that younger cohorts have been denied entry into political life while an aging class continues to dominate the local scene.

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[13] As noted in Table 1 of the Pact sample survey conducted in early 2008, 28.6 per cent of the LAAR CC members were over 60 years old, and 80.4 per cent were over 50.

[14] When we had time to ask members about their backgrounds, we found that quite a few had been in various public positions since the early 1980s or even before. In the 2008 Pact survey (see survey Table 2), 12.3 per cent had served on commune councils for more than 25 years, 31.5 per cent for 11 years or more, and 65.6 per cent for 6 or more years (meaning that they had served in the "first mandate"). These figures comport with what we observed of

Evaluation team interviews with council members generally began with an open ended question: "What is this council's greatest achievement since being elected in 2007?" The purpose of this approach was to avoid asking directly about LAAR, and observe how soon and in what manner respondents mentioned activities under the project. The results were striking. Respondents often began their answers with descriptions of outreach and social development activities under LAAR, and cited with pride their ability to solicit feedback from local citizens and apply that information in planning and governance. Construction and maintenance of physical infrastructure (which were, by project design, not supported by LAAR funds) were sometimes given "equal billing" with LAAR outreach and social development activities, but the latter were never ignored or presented as less important than roads, culverts, or irrigation structures.

The contrast with interviews with half-a-dozen non-LAAR commune councils was illuminating. Responses to the same open ended question invariably began, and ended, with small-scale infrastructure. Respondents made it clear that they continue to regard construction of small-scale infrastructure, generally with the assistance of a government agency or donor, as the basic responsibility of commune councils.

LAAR training for council members was provided in stages. In many cases, commune level training included both CC and CMC members. Both constituencies appreciated the training they received, and many CC members interviewed expressed a desire for more training. Team members did not hear complaints of the type often voiced by trainees in USAID-supported programs: that courses were too repetitive, simple-minded, boring, inappropriate, etc. CC members appeared to value their training greatly, at least in part because it demystifies the "secret knowledge" possessed by commune clerks in such areas as bookkeeping, planning, and budgeting. Several older CC members expressed a desire for a repetition of earlier training, observing that they found it difficult to remember finer points they had learned.

Some observers might feel that too much time was spent on training for outreach activities, given that the principles involved are relatively straightforward. But in the context of Cambodia's recent sociopolitical history and present tight control by the state and CPP, evaluation team members believe that extra efforts aimed at eliciting citizen input, and teaching local leaders how to elicit those inputs, were necessary. Representatives of virtually all CCs interviewed emphasized that LAAR had "brought them closer" to people in their communes. In many cases, this was the first response to our open ended question about the council's most important achievement.

Council members' participation in outreach efforts and SDP selection, design, and implementation has imparted a real sense of ownership over development activities, as discussed below. Here we examine LAAR's administrative face as seen by council members, in particular the 40 per cent counterpart funding requirement and the commercial bank accounts used to transfer LAAR support for outreach activities and the 60 per cent share of SDP budgets.

The 40 per cent requirement is a signature feature of the LAAR program. Other donor-supported activities have sometimes required a much lower level of co-financing, on the order of 10 per cent, or no counterpart funding at all. This requirement drew strong criticism from LAAR's Decentralization Advisory Team, as well as from other donors, who tend to regard it as an excessive opportunity cost for

CC members we interviewed. These demographics all make sense, given that a large proportion of those who had been community elites were killed during the Khmer Rouge era, so that after 1979 there were few seasoned leaders to take charge of local affairs. Younger people had to be recruited for such positions as commune chief, and by 2009 they had become several decades older.

CCs, tying up scarce funds that could better be expended on other activities. In the team's interviews, however, we did not find evidence that CCs believe the 40 per cent requirement is a burden. Rather most CCs appeared to have accepted it as a cost of doing business – an expenditure that leverages an extra 60 per cent from a new source, and enables the council to undertake social development activities they and their citizens regard as important.[15]

The evaluation team came to understand that the 40 per cent counterpart requirement can be somewhat flexible. Informants working at the provincial level in Takeo reported that, in addition to CC discretionary funds (which amount to one-sixth of the annual CC budget), expenditures from other sources may also be credited as counterpart, e.g., funds from another donor to support a theatre troupe that promotes health awareness, or small infrastructure such as latrines or a health post from a line ministry project, might be counted as counterpart for a health-related SDP. However, informants also reported that Pact is now insisting on "real money" for the CCs' share before releasing the complementary 60 per cent.

Commercial bank accounts established to receive Pact's 60 per cent share of SDPs were discussed at virtually every meeting with council members. This appears to be one of LAAR's most popular features.[16] Although this system requires management of two accounts for a single modest project, CC members appeared to be universally pleased with the arrangement. Commercial bank accounts require less paperwork than withdrawing funds from the provincial treasury, and allow significantly more discretion over how funds are deployed. When asked, council members invariably responded that they would much prefer that all project funds be channeled through commercial banks.

However, training required to enable LAAR-designated accountants (the commune clerk or a council member) to handle donor reporting requirements for private bank accounts was very time consuming, and evaluation team members feel a degree of ambivalence about these efforts. On the positive side, as part of a sustained process of public consultation under the outreach activities and responsive programming under the social development projects, they helped to establish new standards of transparency in commune governance. On the negative side, large amounts of time expended by Pact and PNGO staff on training and coaching designated accountants to handle rather small bank accounts might have been expended in other ways—e.g., in building up a larger cadre of CC members and ordinary citizens who are skilled in leading public dialogues. Nor do we believe that donor-specific accounting skills will survive the end of LAAR.[17] Nevertheless, as already noted, most council members queried about this approach to funding LAAR activities expressed great satisfaction with an opportunity to exercise discretionary control over funds, and seemed to feel this opportunity more than compensates for any problems encountered.

As the commune's principal record keeper, the clerk is a critical player in local governance. Because he is recruited and paid by the Ministry of Interior, he cannot be disciplined or fired by the CC, and he exercises significant autonomy in his work.[18] Moreover he enjoys considerable opportunity for rent seeking as the keeper of vital records and dispenser of official forms for voter registration, land records, licenses, etc.[19] Clerks must receive extensive training and pass a competitive examination. The result is that those filling the position possess a level of knowledge of official business far exceeding that of most

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[15] A reluctance to criticize this source of funding may explain some of the positive responses. Even so, the fact that virtually all our respondents appeared to find the counterpart finding acceptable reinforces our point.

[16] The use of commercial accounts is now being duplicated for much larger fund transfers, as the Asian Development Bank undertakes a pilot project providing commercial bank deposits to 37 CCs of up to $150,000 each, with plans to expand soon to 150 CCs. The scale of these deposits dwarfs the LAAR grants. Whether CCs can absorb such large inflows of funding is another issue.

[17] In effect, the program moved the USAID accounting requirements that many NGOs find onerous one level further down, to the CCs.

[18] More than 90 per cent of the clerks and assistant clerks encountered by the evaluation team were males.

[19] Commune chiefs also have some scope to avail of these opportunities.

CC members, thus reinforcing their autonomy. However, as noted above, several council members (mainly chiefs) noted that LAAR training had enabled them to better understand the clerk's duties and thus, by implication, assert a degree of control over the clerk's performance.

Just as team members were struck by the advanced age of CC members, we were also impressed by the relative youth of commune clerks. Of the dozen-and-a-half that attended our meetings with council members, only two appeared to be older than 35. Informal inquiries indicated that clerks tend to move on to other, better, jobs after a few years in the entry-level positions provided by CCs. One result is that, although clerks know more than CC members about the commune's day-to-day activities, it is the chief and ordinary members that possess the council's institutional memory. This is the reverse of the usual relationship between elected officials and civil servants in many other parts of the world. Thus it is all the more important for CC members to gain a real understanding of the clerk's role and duties.

The evaluation team got a very strong sense from CC chiefs and members interviewed that they had gained a feeling of empowerment from their involvement in LAAR. Unlike most development activities that are essentially "turnkey" projects undertaken by a line ministry or outside NGO, CCs feel that LAAR projects belong to them. "Ownership" is an overused buzzword within the international development community, but in this case it accurately describes sentiments expressed by CC informants. DAT reviews suggested that the outreach/SDP process and related compliance requirements posed were likely to obscure and even undercut LAAR's democratization objectives. But the evaluation team did not find this to be the case. LAAR has helped elected local councils establish direction and control over development activities within their jurisdiction and has conferred a sense of ownership. This is a signal achievement for the project.

The Commune Investment Plan (CIP), the District Integration Workshop (DIW) and the system of development activities surrounding them demonstrate a number of key strengths and weaknesses of Cambodia's system of local governance. A brief review also illustrates how LAAR fits into the system. Each commune is required to prepare a rolling five-year Commune Investment Plan and every year uses the CIP to assemble a wish-list of development initiatives (mostly, but not exclusively, involving infrastructure). This is forwarded to the Provincial Local Administration Unit (PLAU), which distributes it directly to the larger line ministries (e.g., Health, Education, Roads, Forestry) that have field operations at the provincial or district level. The field offices select projects they are willing to undertake in the coming year, generally selecting activities that fit neatly within program parameters already established at the national or provincial level. A set of smaller ministries (e.g., Women's Affairs, Water and Sanitation) respond through a provincial entity called the Executive Committee (ExCom), which arranges other commune level projects, mainly in non-infrastructure sectors.

The DIW is an annual event. Provincial units of the ministries mentioned above meet the CCs, which are scattered at tables around a large hall, to confirm (or change) commitments already made. Also in attendance are international and Cambodian NGOs, which may offer projects to fill gaps not covered by government ministries and programs. In addition, donor agencies or individuals (e.g., Khmers residing abroad) may offer to support specific projects. LAAR social development projects can also complement the CC's list of projects presented at the DIW. Informants reported that their CCs generally obtain support for 10-12 projects, thus covering roughly half the items on lists running to 20 or more items.

While informants identified a number of shortcomings in the system—line departments moving too slowly, a planned two-day workshop condensed into a morning, key players failing to attend—the CIP/DIW system demonstrates a clear commitment by the RGC to coordinate what would otherwise be a chaotic process. Based on our experience in other countries, evaluation team members were impressed with this effort to establish a reasonable level of order. We were also impressed by the neat fit of LAAR activities into the system. Several CC informants commented on their council's collective pride in their

ability to identify activities that clearly met the needs of local citizens, and then to include them in CIP documentation. While highest priority social development activities were funded as SDPs under LAAR, some informants noted that activities identified by communities as their second or third priorities (and therefore not funded by LAAR) were sometimes nevertheless included in the CIP and "marketed" at integration workshops.

The process places a premium on CC salesmanship, a fact noted by a provincial official in Kampong Cham and echoed by a few CC informants. When asked, CC members agreed that the DIW system is competitive between communes in their district, and several volunteered that the confidence they have acquired through outreach campaigns and managing their own SDP projects has improved their salesmanship skills at the annual DIWs.

3.6 LAAR components—community monitoring committees

The community monitoring committees were proposed in Pact's response to the USAID RFA as a device for increasing citizen participation and oversight in LAAR partner communes. Generally CMCs were established with 10-12 members, and thus often have more members than their counterpart commune councils. In the first round of partner communes—69 units initiated into the project in 2006/2007—CMCs were formed under a quasi-formal selection process. Even though selection was by a show of hands at a citizens' meeting, the process created a strong sense that the committees were an elected, representative body. USAID staff objected to this quasi-formal selection process, fearing it would create an impression that CMCs are a viable substitute for, or direct competitor to, duly elected CCs. Subsequently, council chiefs and members had a stronger hand in nominating and selecting CMC members.

CMCs have received extensive training and coaching. They were included in training modules on outreach and social development, on the assumption that members would be quite active in community affairs. Particular attention was given to CMC members' potential role in monitoring expenditure of funds under the SDPs. The effectiveness of CMCs was probed in numerous meetings with commune councils and in additional meetings with CMC members and ordinary citizens. Whether responding to general questions from evaluators about council activities, or answering direct queries regarding the role of the local CMC, council chiefs and members were consistently positive in describing CMCs. After a few interviews, team members came to perceive these answers as too consistent and too general, in essence a learned response to outside inquiries. We made a point of probing deeper.

Repeated, increasingly specific questions to council members regarding CMC contributions to the outreach process eventually yielded information on one major task they performed. They invited ordinary citizens—family members, friends, and neighbors in their home villages—to attend public dialogues with council members. But the evaluation team had little success in identifying concrete examples of the CMCs' role as a two-way communication mechanism. Commune chiefs and members were regularly asked to provide specific examples of citizen issues/concerns/problems that CMC members had conveyed to them, either during monthly CC meetings or on other occasions. No examples were forthcoming.

Most informants repeated the LAAR "mantra" about two-way communication, but were at a loss to provide concrete examples. CMC members generally began their responses by reporting that they attend monthly council meetings, implying attendance at virtually every meeting and fulfillment of a representative role. Only after careful probing did actual patterns emerge. While CMC chairmen apparently attend most meetings, other members do so on a rotating basis, and are present perhaps once or twice a year.

Questioning then shifted to the *reverse* communication channel, from commune council to ordinary citizens. CMC members were questioned about messages they carry away from monthly meetings, and

any concrete efforts they make to keep ordinary citizens informed about commune business. In almost all cases the CMCs had no real system to spread reports on CC meetings from the one or two members who might have attended to the rest of the CMC.

In short, the evaluation team finds the "two-way bridge of communication" to be an attractive metaphor, but concludes that actual performance falls short of this ideal. Despite this, we believe many committees have taken on, or can take on, moderately useful functions:

- One commune chief noted that the local committee provided *more bodies* for the work of organizing and inviting residents to attend outreach meetings.
- The evaluation team also noted that many CMCs have members considerably younger than the 45-70 age range observed for CCs. Furthermore, if CMC members are not closely tied to a political party, they may be substantially more *approachable* than the commune chief and councilors.
- Because they participate in outreach dialogues and are invited to meetings where citizen inputs are prioritized and social development projects are selected, CMC members are positioned to undertake *activist citizen scrutiny* of commune governance.
- CMC members' assigned role of inviting citizens to outreach dialogues potentially confers a *mobilization leadership* function, although team members could not detect actual performance of this role outside of outreach activities.
- CMC members' participation in training courses, attendance at a few commune council meetings each year, and visits to the council building, are likely to confer superior knowledge of local administration, making them potential providers of *referral advice* to family, friends, and neighbors.

Each of these functions has potential value, likely to make commune governance somewhat more transparent, accountable, and effective. However, evaluation team members are not convinced that stand-alone CMCs, which have absorbed large amounts of Pact and PNGO staff time, are necessarily the best approach to fulfilling these functions. Nor do we expect most of the committees to survive beyond the life of LAAR. The evaluation team encourages Pact staff to organize an activity in each partner commune during the final year of implementation that focuses on *sustaining the functions of the CMC after the completion of LAAR.*[20]

3.7 LAAR components—outreach activities

Pact made a fundamentally important adjustment to LAAR in 2007 by providing extensive, sustained support for the CCs in the form of the outreach activity (OA). An intense design effort with Silaka and VBNK provided training materials that taught the broad principles of citizen participation, suggested approaches to implementing outreach campaigns, imparted skills in leading public dialogues, and provided techniques to record and prioritize citizen concerns. PNGO field staff were trained on OA over five days, and then provided training and coaching to CC and CMC members as they designed and implemented outreach campaigns over a period of several months. A total of 230 CCs undertook OA in 2007, and 126 initiated the process in 2008.

Pact also provided councils with modest funding to undertake outreach—$1,360 for each CC undertaking this activity in 2008. Funds were used for administrative/capital costs such as stationery, a bullhorn for leading meetings, and a safe; and for operational costs such as small reimbursements to dialogue leaders traveling to village meetings and refreshments for attendees and leaders. Either the commune clerk or a council member was selected as accountant for the funds, which were transferred to a private bank.

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[20] This challenge will be one of the focus areas of the next Development Advisory Team mission.

Training on managing funds took up a significant portion of initial OA training for PNGOs, and their staff in turn spent a significant portion of their time training and coaching CCs on fund management.

The positive side of funding OA was that it provided council members a clear incentive to adopt this novel governance strategy through modest travel reimbursements, and provided citizens an incentive to attend meetings because refreshments were provided. A possible negative aspect is that it has led many CC members to regard outreach as an activity necessarily involving significant costs. They may also be inclined to view outreach as a process that requires a comprehensive campaign strategy each time it is applied. However, evaluation team members believe, now that citizens have seen the value of public dialogues, that substantial outreach campaigns can be repeated at minimal cost and that outreach skills can be applied in a wide variety of governance tasks. Pact and PNGO staff are focusing on efforts to convince CCs to allocate their own modest funds to repeat these activities.[21]

Although outreach efforts varied in intensity and design among the 30 LAAR commune councils visited, team members are convinced they have been sincere and generally effective exercises in building traditions of participation, transparency, and accountability. They have also reduced the climate of fear that ordinary Cambodians generally feel in the presence of government officials. As noted in the section on commune councils, careful attention to outreach has brought council members closer to their constituents, improved the quality of inputs to the formal planning process, and helped chiefs and councilors to market their projects more effectively in district implementation workshops. In addition, outreach has provided a needed mechanism for identifying and prioritizing community problems and issues prior to selecting and implementing social development projects.

It was difficult to tease out the details of the outreach process, and the degree to which council members and others have retained an understanding of how to repeat it. Like most people, council members seldom consider the implementation details of public events, focusing instead on information to be imparted or received, or decisions to be made. Despite difficulties in teasing out implementation details, team members have developed a broad understanding of outreach process and its variations among communes. Design of initial outreach activities in each commune was carried out after initial training, under PNGO guidance. Main elements included scheduling a series of meetings, designating council members and other leaders to conduct them, tasking CMC members or village chiefs with inviting residents to attend, leading participatory dialogues, and eliciting citizen views on issues/problems/complaints.

As council members led dialogues, they became more familiar to local citizens and, to the extent they listened carefully and recorded inputs faithfully, had an opportunity to build trust and political support. Particular facets of the process included:

An outreach schedule: Council members, advised by a PNGO field worker, with the clerk to record decisions, began to work out a schedule for a series of village meetings, and assignments for council members and others who would lead (or facilitate) the meetings. In contrast, councils in non-LAAR communes appear to follow a less extensive, standardized schedule of meetings with residents, and feel little need for a *strategy* for consultation and outreach.

Village meetings: The primary vehicle for outreach appears to have been the village-level meetings. Based on descriptions by CC members, and allowing for moderate over-optimism, we estimate that each meeting drew about 30-50 village residents, generally a mix of men and women. CMC members or village chiefs were asked to inform residents about planned meetings and invite them to attend. According to reports received in interviews, the total number of village-level meetings undertaken varied from a low

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[21] In February 2009, LAAR staff shared the experience of project CCs with outreach campaigns with the National League of Communes/Sangkats.

of 10 to a high of 64, and from two to eight meetings per village. Council members in non-LAAR communes reported a process that involves, at most, one annual meeting per village.

Additional meetings: In addition, council members were encouraged to make special efforts to reach individuals and households less likely to participate in village-level meetings—shut-ins, the physically handicapped, the blind, widows—through house visits, and to make informal contacts in markets, temples, etc. Based on accounts received, we believe many LAAR CCs adopted this approach. We do not have the impression that non-LAAR councils make this effort.

Meeting length: Informants uniformly reported that village-level meetings lasted "three hours" or "half-a-day". This is significantly longer than the one-hour-plus length non-LAAR council members described for the few citizen meetings they organized.

Meeting conduct: Council members consistently stressed that they themselves led meetings with citizens, and emphasized that they elicited input from citizens, and did not lecture attendees or impose council views. While it was difficult to elicit clear descriptions of techniques used, team members eventually learned about a simple matrix used to list problems identified, and also to suggest causes and possible solutions. After repeated cross-questioning, informants made it clear the matrix is not filled in advance to display council views, but used as a device to elicit and record citizen views. In contrast, non-LAAR communes enter meetings with a pre-determined list of small-scale infrastructure projects, and after a brief explanation, ask attendees to vote for one item on the list. This very limited approach to eliciting citizen participation appears to reflect procedures prescribed under the UNDP-supported SEILA project.[22]

Meeting output: The meeting output from each village was a fairly rich set of citizen views on local issues/problems. Although the identified problems were not clearly prioritized in the matrix format, council members leading the session and other attendees such as village chiefs and CMC members no doubt left the meetings with strong impressions about which issues were most pressing in the village. This information benefited commune governance in multiple ways. In particular, it defined the general focus of social development projects, improved the content of official planning documents, and provided council members clearer, more coherent arguments as they went to district integration workshops and other venues to "sell" village priority projects.

Citizens reached: Even a low figure of ten village meetings (two in each of five villages) in one LAAR commune implies there were roughly 300 attendees, while a figure of 64 meetings, even allowing for residents attending multiple meetings, implies as many as 1,500 local citizens were reached. In contrast, non-LAAR CCs schedule, at most, one meeting, and probably reach scores of residents, rather than hundreds.

How the process differs from established practice: To summarize, each LAAR partner council planned and implemented an outreach campaign (rather that scheduling a few perfunctory meetings); organized consultations at which leaders mainly listened (rather than lectured); carefully probed and recorded citizen views on local issues (rather than forcing a vote on a pre-determined list of infrastructure projects); solicited inputs from hundreds of citizens (rather than scores), and used the results to improve planning and governance in multiple ways (rather than feeding into a single decision by district administrators).

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[22] SEILA is a RGC program to alleviate poverty in rural areas and to promote local governance. In Khmer SEILA means "foundation stone."

What's new for citizens: Although some efforts may be flawed and hesitant, outreach activities offer a satisfying new experience for citizens. The councilors actually listen to citizens, clearly make efforts to understand, record their comments, and use the combined input to prioritize commune projects. Implementation of a specific SDP solidifies an impression that citizen participation and local government accountability are becoming authentic features of Cambodian governance.

Evaluation team members assume that citizens in LAAR partner communes expect to be consulted again. And council members clearly take pride in their new ability to elicit citizen views and prioritize local problems. Although initial LAAR support for outreach was personnel-intensive and time-consuming, the potential payoffs are clear. Councils should repeat OA, or a modified version, periodically.[23] However, team members predict significant variation in levels of success in repeating the process, e.g., where the clerk was substantially involved in supporting design—at least to the extent of recording meeting schedules, collecting outputs in matrix form, and filing materials—it may be possible to replicate the process in detail, or make sound judgments about modifying it. In communes where records are skimpy and understanding limited, councilors may undertake more limited repetitions: for example, simply by applying new skills in facilitating particular dialogues. One specific skill team members believe will be helpful is using a simple problem matrix to elicit and record citizen inputs.

One likely barrier to effective repetition of outreach is that councilors are overly focused on costs incurred (and covered by Pact) in the first outreach round. When asked if they plan to repeat outreach "after LAAR," virtually all councilors responded positively. But most opined they would need to expend some of their limited commune funds to cover costs: notably travel for facilitators and refreshments for attendees. It seems that little thought has been given to recasting outreach as a no-cost, voluntary activity, either by Pact, the PNGOs, or partner CCs. In the opinion of team members, the process can be reformulated, with volunteer-led village consultations promoted as "a chance to be heard by your council," not as occasions for receiving free refreshments.

The substantial success of outreach activities has been effectively conveyed by Pact staff to senior officials in the Ministry of Interior, and those officials have given verbal assent to the concept of including a separate line for local outreach activities as a line item in annual central government budget allocations to commune councils.

3.8 LAAR components—social development projects

A total of $245,410 in grant funding was awarded to 69 CCs for SDPs implemented in 2006/07, an average of $3,557 per commune. The original intention may have been to award SDP grants after a consultation process to identify community priorities. However, it was decided that the first round of SDP grants should be awarded after abbreviated community consultations. Thus activities chosen for the first round may not have accurately reflected community needs. In any case, evaluation team members believe the projects did help CCs to broaden their understanding of their communities' development needs, by extending their horizons beyond an entrenched emphasis on physical infrastructure. The project also created new traditions of direct CC oversight over local development activities.

The first round of grants helped Pact to recognize the need for a more systematic approach to citizen consultations, and led to concerted efforts to support CCs' in public outreach activities as a preparatory step toward selecting and designing SDPs. In 2008, 229 CCs in eight provinces received funds for OA as described above. OA enabled CCs to identify *social issues* of greatest concern to local

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[23] The manual for training PNGOs on OA clearly states that these activities are expected to be "a sustainable practice managed by CCs." Team members are of the opinion that a fairly intense outreach effort twice in a five-year council term might be appropriate.

citizens. LAAR funds were not available to support infrastructure or livelihood activities. However, project staff will consider support for livelihood activities on a case-by-case basis in 2009.

After identifying and prioritizing community social needs through outreach, the next step in the SDP process required each CC to design specific activities to respond to prioritized needs. Grants averaged $1,852 per commune and ranged from $862 to $3,305. In the opinion of evaluation team members, the attention of LAAR and PNGO staff to facilitating outreach activities was not matched by equally careful investment of resources to help CCs design and implement their SDPs.

PNGOs worked with CCs (and sometimes other residents, including CMC members) to develop a list of activities related to the SDP topic. These campaigns are often only loosely related to each other, and the problem the SDP was meant to address. SDPs conducted in round one (FY 2006/07) and two (FY 2008/09) focused primarily on public awareness campaigns related to pressing social problems such as teen drug use, domestic violence, infant mortality, and illegal fishing. While the campaigns were no doubt of value in fostering public attention and raising the level of concern, most of the SDPs so far undertaken seem to require *concrete follow-on activities,* e.g., specific steps must be taken to identify and treat teen drug users, and to report pushers to the police; and families where infant deaths are most likely to occur need to be singled out for special support.

Having become aware of shortcomings in the initial rounds of projects, USAID encouraged Pact to introduce an amended methodology for designing third round SDPs to make them more "measurable, visible, and durable." PNGO staff were trained to facilitate CCs efforts to prepare a LogFrame with progress indicators. All 356 partner CCs have submitted, or are in the process of finalizing, SDP proposals with LogFrames for activities to be implemented in 2009/10. In the opinion of the evaluation team, however, there is, at best, only marginal improvement in the relevance and coherence of activities selected and in their relationship to progress indicators selected. To the extent there have been improvements, these have occurred where CCs have chosen to implement small-scale infrastructure projects as follow-on activities (e.g. construction of privies for poor families), a practice not allowed in earlier SDP rounds.

CCs prepared draft budgets for implementing SDP activities and invited bids from local service providers registered with provincial governments. These could either be NGOs or government units. In most cases, government line departments were among the few responsive bidders. PNGOs were occasionally selected as service providers in provinces where they are not directly involved in LAAR. Although service providers chosen may have been the best local organizations to implement the SDPs, in most cases they seem to lack knowledge of the state-of-the-art in addressing social needs in Cambodian communities. Few, if any, printed materials have been used, and public awareness messages and methodologies were basic (and flawed in some cases). LAAR communes seem not to have benefited from available national and international expertise, materials, and approaches to the social problems prioritized by citizens.

LAAR's overall impact up to the present does not depend heavily on measurable results from SDPs implemented so far. Citizens have had the satisfaction of knowing their CCs are planning and implementing activities meant to respond directly to their concerns. And the acceptance by a large number of government officials working at the district and provincial level, and in national units including the Ministry of Interior, that *social development is a valid concern of commune councils* is a major success of the LAAR project.

However, the project's other greatest impacts have been, e.g.,: 1) attitudinal shifts among CCs and citizens regarding the need for government accountability; 2) creation of concrete new skills for facilitating participation and accountability; and 3) influence on national government procedures and

attitudes. In the long run, sustaining these *other* impacts will depend on making significant improvements in design and implementation of SDPs. Consolidating CCs' understanding of the *process* of planning and implementing sound social development may be more important in the long run than ensuring current SDPs have measurable impact. CCs need be able to repeat the process of identifying practical, realistic interventions on their own, and need to know how to access technical information and resources in key social sectors.

The evaluation team believes that program funds should be released to the FY2009/2010 generation of CCs as scheduled. But further refinements should be made to the SDP process as those activities get under way. Some steps need be taken quickly. The team encourages Pact and PNGO staff to:
- Identify geographic clusters of communes working on the same themes and connect them with a national service provider.[24] The service provider can help to narrow the focus of activities to practical, realistic interventions based on current knowledge and best practices, and should supply copies of relevant materials: posters, brochures, drama scripts, etc.
- Connect with UNICEF, The Asia Foundation, and other organizations working with communes on social development and environmental issues, thus avoiding duplication and benefiting from their knowledge and materials on specific social sectors.
- Engage a short-term consultant to develop a standardized Tool Kit for distribution to CCs. It should include sample activities, support materials, and contact information for potential service providers for the top five social development themes identified so far.
- Develop an even simpler methodology and LogFrame format to help CCs plan more realistic CC interventions.

3.9 Other LAAR components

The Decentralization Advisory Team
In its technical application for LAAR, Pact proposed a DAT consisting of international and in-country decentralization experts, tasked to conduct semi-annual assessments and provide strategic advice on program activities.[25] Pact recruited experts, who submitted their first report in May 2006 and their fifth in June 2008. The team is projected to conduct at least one more review.[26]

DAT members took their task seriously, conducting extensive field visits and writing detailed reports, often with very frank criticism. The first report focused on a perceived lack of project emphasis on citizen participation, partnerships, and advocacy, all leading to potential loss of project focus. The team's second report, in October 2006, found that actual engagement with citizens had improved, but the project purpose was still being misunderstood, with PNGO field workers and local citizens perceiving LAAR as a small grant activity emphasizing SDPs, rather than a program to strengthen citizen engagement. DAT members also found LAAR's objective of covering 500 communes in 10 provinces to be far more ambitious than could be sustained, and successfully recommended a reduction in scale.

The DAT's third report (June 2007) concentrated on a critique of the gender, natural resources and environment components in the LAAR program. The fourth report (January 2008) tackled a "structural dysfunction" between LAAR's program and grants management components. And finally, the fifth report (June 2008) undertook a mid-term review of the whole LAAR initiative, covering training, CMCs,

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[24] A grant to a national service provider (such as Project Against Domestic Violence, PADV) could include administrative and personnel costs, with communes paying a standard fee rate based on the number of villages to be covered. Although activities might need to be tailored to the specific needs of each commune, most activities are likely to be common to many communities.

[25] See Pact's LAAR Technical Application, page 20.

[26] David Ayres and Shelley Flam worked on all the reports, joined by others on each occasion. The evaluation team interviewed Ms Flam.

outreach activities, notice boards, the SDPs, and efforts to inform policy at the national level. The team offered a cogent critique of each component.

Evaluation team members were favorably impressed with the DAT process; none of us had encountered anything quite like it in our previous professional experience. The DAT clearly pulled no punches in discharging its tasks of analysis and criticism. While some DAT criticism may have been over zealous or misplaced, much was on target and played a useful role in keeping LAAR implementation on the right path. A primary example was an on-target, successful criticism that led to agreement by PACT and USAID to scale the project back to eight provinces and 356 communes. A more modest contribution was acceptance of the team's recommendation to drop financing of village notice boards for the last group of communes incorporated into LAAR.

Equally important was the DAT's insistence on raising fundamental issues about program philosophy and ultimate impacts: Are SDP procedures and USAID compliance requirements displacing a needed emphasis on LAAR's overall democratization impacts? Are the processes undercutting the purpose? This kind of honest inquiry is seldom seen (or in any case, seldom formalized and written down) in USAID Democracy/Governance programming. The evaluation team regards the DAT as an honest, refreshing, and promising approach to promoting this kind of inquiry. Pact demonstrated courage and creativity in including the DAT as part of LAAR, and although the criticism must sometimes have seemed overly harsh, we believe it made for a better program.

The self-assessment tool
In their 2005 project proposal, Pact promised to design a self-assessment tool for CCs to use in gauging their effectiveness and responsiveness. A Commune Council Performance Assessment methodology, developed by UNDP, is already in place. But many observers believe it is overly complex and cumbersome to use. Pact aims to build a simpler, more user-friendly instrument. Development of the tool did not proceed very far during LAAR's first three years, but after a new monitoring and evaluation unit began its work in September 2008, things have picked up. During March 2009, members of 30 CCs assembled at the Pact office for a workshop to help craft the tool, which Pact hopes to test in May 2009. Once tool development moves beyond the pilot stage, Pact staff hope the National League of Commune Councils will adopt it for use by members.

Notice boards
One LAAR outreach component supported construction of commune and village notice boards to inform citizens about project activities and other matters of local interest. Almost immediately after their construction, questions arose as to how effective the boards are. In the fifth DAT report, notice boards came under heavy criticism for lack of use, and funding for their construction was dropped for the last group of LAAR partner communes; Data from the 2008 LAAR opinion survey indicated that about 15 per cent of respondents learned about CC activities from *commune* notice boards, while almost 14 per cent learned from *village* boards (see survey Table 3). When LAAR communes were compared to their non-LAAR counterparts, LAAR respondents were about 6 percentage points more likely (15.6 per cent as against 9.8 per cent in non-LAAR communes) to learn from notice boards. A difference of this magnitude is not sufficient to justify continuation of the notice board program and its associated costs, measured both in dollars and staff time expended. In the evaluation team's opinion, the decision to drop this activity was sound.

3.10 Impact on national decentralization policy

LAAR is not primarily a policy project, and there are no Pact staff working full-time to advocate for specific legal, regulatory, or procedural changes. But the project's large "footprint," with ongoing activities in 22 per cent of Cambodia's communes, has brought attention and appreciation from national,

provincial, and district government counterparts, and a willingness to be influenced by lessons learned under LAAR. The project has influenced implementation of the 2001 Commune Administration Law in the past couple of years, and also application of the 2005 Strategic Framework on Deconcentration and Decentralization within the broader policy setting.

Pact staff have worked patiently at the national level to identify acceptable procedures for transferring funds to partner CCs through private bank accounts, to secure approval for the 40 per cent counterpart funding requirement for SDPs, and to introduce new provisions for the project implementation manuals (PIMs) being developed by the Ministry of Interior.[27] Acceptance of the right of CCs to open and manage private bank accounts is s significant policy breakthrough.

Collaboration with provincial and district counterparts has involved work on identifying appropriate partner communes and trainees, extensive information sharing, and detailed discussion regarding acceptable funding sources for commune counterpart funding of SDPs. The result of official interactions with LAAR over three-and-a-half years has been a ready acceptance that social projects are a legitimate facet of commune development; an appreciation of why and how CCs need to become more transparent and accountable; and a willingness to alter procedures to make them more supportive and flexible. Although these changes are not easily captured in the form of quantitative indicators, they are among the most important achievements of the project.

3.11 Relevance of LAAR for Cambodia

To help us organize the immense quantity of information made available to us, the evaluation team attempted our own summary of key elements of the "development hypothesis" that has shaped design and implementation of LAAR:

1) *A major opportunity:* A new structure (the elected commune council) offers donors unique opportunities to support public participation and operational transparency that can, in turn, make local governance more accountable and democratic.
2) *A challenge that can be met:* Despite the advanced age of council members, and their dominance by a single party, elected leaders can learn concrete skills for reaching out and responding to citizens, thereby creating new standards for council performance and new expectations on the part of citizens.
3) *A complementary mechanism:* Representative citizen groups (CMCs) can be selected, then tasked to serve as a two-way "communication bridge" linking local governments and citizens more closely, inducing the former to become more responsive to the latter, and empowering the latter to air their concerns more readily.
4) *A broader view of development:* Focusing a significant portion of project activities on social development, offered as a valid alternative to infrastructure construction, can help local governments and citizens to broaden and refine their conception of the development process.
5) *Buying into the project:* Requiring partner communes to make substantial counterpart investments (the 40 per cent matching fund), then giving them control over project design, implementation, and monitoring, makes them self reliant stakeholders in development rather than dependent bystanders.
6) *Achieving a national impact:* A project that creates a large implementation footprint (as opposed to undertaking a small pilot activity) can attract champions within the RGC and build the momentum needed to change policies and improve procedures for communes across the country.[28]

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[27] Based on varied opinions expressed during interviews with government officials, team members are unclear whether there will be a single, expanded PIM, or separate PIMs for infrastructure and social projects.

[28] Pact staff plan to coordinate with donor partners—e.g., Unicef/Seth Korma and Danida/NRM—to document and inform stakeholders regarding effective implementation and development benefits of the SDP approach.

We will use the components of this hypothesis to structure our general observations on the relevance of LAAR for Cambodia:

1) A major opportunity—helping to reform the most accessible level of government:
It was reasonable for USAID to choose Cambodia's commune councils as an entry point for building new traditions of participation, transparency, and accountability. The CC is the government institution encountered most often by ordinary Cambodians, the setting where they experience democracy, or its absence. Full-blown accountability has not yet been achieved, and no observer expects the CPP to open itself to full scrutiny or surrender its grip on the countryside. However, the evaluation team has observed that CCs (all CPP-dominated) involved with LAAR have embraced opportunities to reach out to local citizens, and feel themselves "closer" to those citizens than ever before. We believe this represents an important contribution toward building an authentic Cambodian democracy.

2) A challenge that can be met—"teaching old councilors new tricks:"
The commune council is an important *institution*. But the individuals who serve on it matter too! The average age of CC chiefs and councilors is high. Many are in their 60s, virtually none are younger than 45. Many began their service in appointed councils during the Vietnamese occupation, and thus can be assumed to subscribe to the norms and practices of an authoritarian system. Given the long careers of many of these individuals as members of the CPP and its predecessor party, it seems reasonable to expect greater loyalty to the party than to local citizens. On paper, the age and affiliation of councilors appears to be a major barrier to LAAR's success. This has not turned out to be the case. Scores of informants in 30 CCs spread across five provinces made much the same point: "We have learned important new skills, notably how to conduct an outreach program and to select, plan, and implement a social development project." Their ability to describe the newly-acquired skills, and how they have brought leaders and citizens closer together, provides solid evidence that elderly councilors can learn new skills.

3) A complementary mechanism—a people's committee:
CMCs have served their communes, and complemented the work of CCs, in useful ways. They have supported a multi-step mobilization process to elicit citizen views on local development, mainly by inviting fellow citizens to participate in meetings scheduled during CC-sponsored outreach campaigns. In addition to this "town crier" function, they have also acted as a monitoring unit by attending monthly CC meetings. Transparency has potentially increased, in that the CMCs offer a mechanism for reporting citizen views to the CC, and disseminating information regarding CC activities to the citizens. However, so far the mechanism appears to be operating imperfectly, and its potential is yet to be realized.

4) A broader view of development—adding social activities to the development mix:
There appears to be some difference of opinion within LAAR and the central government regarding which development initiatives constitute *social development*. Do income generation activities qualify? What about health information campaigns? What of natural resource management schemes? However defined, though, there is general agreement that social development can be readily distinguished from infrastructure, which generally refers to physical edifices such market and school buildings, roads, electrical systems, and irrigation dams. The evaluation team found a near-consensus among CC informants that LAAR, through its emphasis on social development projects and absence of financial support for infrastructure, has broadened their view of development. They no longer equate it strictly with infrastructure. Social development activities—campaigns against drug use or domestic violence, efforts of regulate fishing, programs to improve child health—can also make essential contributions to local development. Other donors have also promoted social development, and have presumably contributed to a broadening of the development paradigm. But LAAR's contribution appears particularly important, probably because of its emphasis on fully involving CCs in planning and implementing activities.

5) "Buying in" to the project—the 40 per cent counterpart funding requirement:
Most donor- or RGC-sponsored projects at commune level function with little or no involvement from
CCs. Activities are undertaken on a "turnkey" basis. Development goods are produced or delivered in
isolation from the CC. In contrast, LAAR's 40 per cent counterpart requirement and inclusion of CCs in
all facets of the SDP process have ensured that elected leaders are genuine participants in externally
funded development. This change can be regarded a a significant contribution toward nurturing CC
autonomy, ensuring they can become development leaders, rather than passive recipients of outside aid.

6) Achieving national impact—creating a large "footprint:"
LAAR's design included an ambitious plan to achieve significant commune coverage in the first year and
then expand stepwise to 500 communes in 10 provinces. The intent was to achieve a presence sufficient to
compel serious policy attention and bureaucratic support in Phnom Penh. The planned expansion to 500
communes was not embraced with enthusiasm by other donors. The DAT also raised doubts about the
wisdom of expanding rapidly to 500 communes. Team members were more comfortable with approaches
that begin with small pilot efforts that allow for experimentation with varied implementation strategies
before significant expansion. The DAT recommendation was that expansion be stopped with about 350
partner communes eventually. Even so, the project covers 22 per cent of Cambodia's communes, a third
of the country's provinces, and about a quarter of the population.

Over its first three-and-a-half years, LAAR has indeed caught the attention of senior officials in the
Interior Ministry and the donor community. It is regarded as an innovative project, with significant
implications for decentralization policy across the country. Can this attention and support fuel sufficient
policy momentum to institutionalize the LAAR approach at the national level? It is too soon to tell. But
the team believes that LAAR has established a trajectory headed in the right direction. More cannot be
expected at this stage.

3.12 Measuring effectiveness of LAAR in Cambodia

Pact staff monitor implementation progress mainly by using standard USAID results indicators for local
government and decentralization, anti-corruption, and civil society strengthening. Numerical targets are
set and annual reporting to USAID is quantitative—number of trainees in project-supported courses,
number of communes assisted, etc. Adequate progress is assumed when reported numbers meet or exceed
targets, and on this basis LAAR is meeting most of its targets. Use of USAID measures that focus largely
on providing standardized, worldwide data for reporting to Congress does alert project managers to
possible implementation shortfalls, e.g., if reported numbers of trainees fall substantially short of the
annual target, one likely explanation is that implementers are lagging in organizing and implementing
courses that are essential for project success. If this interpretation is correct, managers can press
implementers to move ahead more energetically.

On the other hand, target setting is usually more an art than a science. Field investigations, careful
analysis, and detailed reports of the DAT have identified implementation problems and opportunities,
often far in advance of routine results reporting. Thus, a DAT report flagged the issue of over-rapid
expansion of project partner sites, and initiated the discussion that lowered the number of target
communes from 500 to 350. A DAT report questioned whether village notice boards were producing
benefits commensurate with financial and labor costs incurred in installing them, and this activity was
dropped from the project. By relying on a combination of quantitative progress indicators and DAT
reports, LAAR managers are well equipped to track project implementation and take corrective actions.

3.13 Impacts of LAAR

In addition to standard USAID progress indicators discussed above, LAAR staff also attempt to capture
project impacts through five "management indicators" set in consultation with USAID/Cambodia's

program office. These numbers reflect an attempt to capture useful information regarding citizen participation and council transparency, including data on citizen attendance at monthly CC meetings and similar measures. But, for management purposes, and for use in evaluating project impacts, they are quite limited. Indicators 2.2.3.e, 2.2.3.f, and 2.2.3.i all capture essentially the same information regarding attendance at monthly CC meetings. The other two indicators aim to measure the impact of an activity that is still in the design stage.

But, it seems clear that neither Pact staff who drafted the proposal in 2005, nor current managers regard the handful of indicators in Table 1 as the primary instrument for measuring LAAR impacts. Pact proposed an elaborate baseline study in the project proposal,[29] but did not manage to undertake the study in the first three years of the project. Needless to say, the absence of such a baseline study makes it difficult to fully assess impact over the course of the project.

It was not until late 2008 that an opinion poll was administered to citizens and CC members in LAAR and non-LAAR communes. It was commissioned from the Center for Advanced Study, Phnom Penh, and reached more than 2,500 citizens in 420 CCs, thus including citizens and councils from both LAAR and non-LAAR areas. Carrying out the poll three years into the project is scarcely an ideal arrangement, but with careful attention to designing an additional survey round, some useful, statistically valid analysis of project impacts can be achieved.[30]

Table 1 (second, fourth, and sixth columns) indicates that residents of LAAR communes were somewhat more likely than those in non-LAAR communes to have attended a community or village meeting in the last year.[31] Additional, potentially fruitful comparisons could be made after a second Pact survey (probably in 2010), which would provide concrete evidence of LAAR's impact over time. Unfortunately, there were only a few items in this lengthy survey that could be used to gauge project impact. The majority of questions, while of interest to researchers examining participation and democratization issues, have no concrete relationship to LAAR activities. When the next survey is designed, the evaluation team strongly recommends that expert advice be solicited on constructing an instrument that yields a maximum amount of data on project impacts, both for ordinary citizens and CC members.

While a full-scale "before and after" assessment is no longer possible, another round of polling can be designed along classic "treatment vs. control group" lines, comparing differences between treated communes (those participating in LAAR) and those not treated. Furthermore, the accumulating impacts of LAAR "treatment" can be measured in two phases, in 2008 and again in 2010. A survey in 2010 can measure the cumulative effects of additional project activities (notably additional SDPs), as well as comparing LAAR and non-LAAR communes overall. Table 1 (with the addition of the third, fifth, and seventh columns) demonstrates a possible table format.

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[29] This was the Baseline Mapping and Gap Analysis proposed in Pact's Technical Application, on page 4.
[30] It is unclear from the September 2008 survey report (Meerkerk et al., 2008) or the SPSS (Statistical Package for the Social Sciences) raw data how many surveyed communes were from the first, second and third waves of activity. However, this information is essential for analyzing project impact data. Both citizens and council members in the successive waves will have had rather different experiences with LAAR (e.g., those with two SDP cycles as opposed to only one). If the SPSS data do include a commune identification number, it may be possible for the Pact monitoring and evaluation team to make these distinctions for future analyses.
[31] Per comments in the previous footnote, it would be critical to determine differences between LAAR communes in the different waves, given that those in the last wave would not have undertaken the outreach phase at the time of the survey.

**Table 1: During the past year, did you attend a community or village meeting?
LAAR commune/non-LAAR commune; 2008/2010**

	LAAR commune -2008	LAAR commune -2010	Non-LAAR-2008	Non-LAAR-2010	Total-2008	Total-2010
Would never do this	23		18		41	
	1.4%		2.1%		1.6%	
Would if had the chance	628		357		985	
	37.9%		41.3%		39.1%	
Once or twice	460		242		702	
	27.8%		28.0%		27.9%	
Several times	293		152		445	
	17.7%		17.6%		17.7%	
Often	248		92		340	
	15.0%		10.6%		13.5%	
Don't know	4		3		7	
	.2%		.3%		.3%	
Total	1656		864		2520	
	100.0%		100.0%		100.0%	

A major purpose of this mid-term evaluation is, of course, to assess project impacts. The observations below are not the result of rigorously designed research protocols, but do reflect the judgments of a team with roughly 70 years (collectively) of working in the development field, and professional experience in more than a dozen countries in Asia and elsewhere in the developing world.

Impacts of LAAR—the big picture:
- LAAR has begun to produce useful policy shifts—acceptance of social development as an appropriate goal of local planning, the 40 per cent matching fund requirement, and openness to revising the project implementation manual—by national, provincial, and district officials.
- LAAR CCs are different from non-LAAR CCs—more conscious about participation and accountability, more aware of social issues, and more confident they can serve citizens and deal with officials and NGOs
- The LAAR model—working directly with CCs through PNGOs, emphasizing participation, transparency, and accountability through outreach and social development—has been the right approach at the right time.
- Councilors have begun to accept that they, as elected representatives, must be responsive to citizen priorities, especially in spending public funds.
- Citizens have begun to feel that they have the right to ask questions of and work side-by-side with elected representatives and other government officials.

Pact's role:
- Pact currently has the leaders and staff in place to carry LAAR to a successful conclusion and help PNGOs and partner CCs prepare for the future.
- Pact's institutional strength in working with and through indigenous NGOs has benefited LAAR.
- Implementing LAAR in 356 communes seems "about right," enabling Pact to focus on quality while maintaining a significant "footprint" so LAAR can influence national policy.
- Pact's strategy of working through PNGOs has ultimately proved effective.

PNGOs and their role:
- PNGO personnel appear insightful about LAAR goals, proud of specific accomplishments, and aware of challenges.
- Working through PNGOs necessarily required slow start-up and systematic preparation. But advantages included:
    - Pact did not recruit provincially based staff away from local NGOs.
    - PNGOs' relationships with CCs and commune residents and knowledge of local governance will be useful to civil society and councils post-LAAR.
    - The LAAR experience will enhance PNGOs' skills in implementing virtually all of their future activities. E.g., in five of eight LAAR support provinces, a LAAR PNGO represents civil society on the Provincial Government Accountability Working Group.

Commune councils:
- Councilors feel closer to citizens, largely because of successful outreach activities.
- Individually and collectively, councilors view SDPs as "real development;" their planning is no longer limited to infrastructure.
- Councilors feel ownership of LAAR-supported projects; they are different from the "turnkey" projects implemented by other donors and NGOs.
- Councils have come to regard the 40 per cent counterpart requirement as a leveraging mechanism, not a barrier or an unfair imposition.
- Councils have improved the quality of their planning documents, and feel better prepared to participate in district integration workshops. They believe participation in LAAR-sponsored activities, notably outreach and the SDPs, has enhanced their "selling skills."
- The councils like having significant control over commercial bank accounts. The autonomy it confers is worth the hassle of operating dual accounting systems.
- Chiefs and councilors appreciate LAAR-sponsored training that demystifies secret knowledge of clerks, giving them more real supervisory power.

Outreach:
- Introduction of outreach activities in 2007 became a major success factor in LAAR capacity building. These activities and the learning they entailed are greatly valued by CC members.
- The outreach approach fostered under LAAR is replicable, at least in part, but a strong emphasis on finances and accounting in implementing the activity may needlessly discourage replication.
- Outreach as modeled under LAAR can be replicated usefully in full, or modified, or its component parts can be adopted.

Community monitoring committees:
- The CMCs are, apparently, well regarded by CC members.
- Their members have played a useful role in outreach notably by inviting citizens to consultations.
- It is likely useful that some CMC members attend council meetings.
- But the role of the committees as a "two way bridge for communication" is hard to detect.

Social development program:
- Council members, citizens, and senior RGC officials now accept social interventions as a legitimate element of commune development—a major success.
- Councilors in LAAR communes now accept that transparency and accountability are "part of the job," and citizens expect to ask questions and be informed about commune business
- Acceptance of the 40 per cent counterpart funding requirement by national and provincial officials represents a significant shift in policy thinking.

- The first generation of SDPs, which emphasized public information campaigns and persuasion, helped to create new traditions of democratic accountability, but eventually these activities should be more focused, sustainable, and in line with what communes can actually <u>do.</u>

3.14 Sustainability of LAAR

In the evaluation team's judgment, the CMCs will face the considerable difficulty in being sustained as organizations. After a strong start acting as mobilizers during outreach activities, most committees have shown little evidence that they are discharging their other designated function as a bridge between citizens and CCs. As many CCs choose to continue their SDP projects from 2008/09 into 2009/10, it will not be necessary to organize elaborate outreach campaigns. CMCs are likely to lose momentum because they will not be engaged in this energizing task.

The evidence from numerous interviews with both CCs and CMCs is that members of the latter do attend monthly meetings of the former. But careful probing has clarified that the number of CMC members actually attending is generally two or three, and that the attendees' role in facilitating two-way communication between CC and citizens remains a project-supported ideal, seldom achieved in reality. We did find occasional examples of CMCs relaying specific information to CC members, e.g., during emergencies (accidents, floods, women in labor, etc.) or to report specific against public order such as illegal fishing. But we did not get the impression that even these narrow reporting practices are widespread. In any case, these limited examples of information sharing might just as well be undertaken by village chiefs, their deputies, or the designated village representatives.

CMCs face at least two serious constraints to becoming institutionalized. First, their members receive no remuneration, not even for the expense of traveling to the commune center for meetings (a distance of 10 kilometers or more from some isolated villages). Members have no material incentive to continue their work, and satisfaction from community work is likely to weaken as the demands of work and family responsibilities assert themselves. A second and related constraint is that many of the CMC members the team met with are relatively young, often around 30 years old. In contrast to CC members who are generally much older, young people are more likely to become preoccupied with raising families, taking jobs, or operating businesses, perhaps even migrating to other areas over time. It is likely to become increasingly difficult to retain their allegiance to the CMCs.

PNGOs were selected by Pact as implementing partners in part because each had already established a track record as viable organizations. The extensive LAAR training they received and the intensive experience they are accumulating over the life of the project should increase their prospects for sustainability by providing their expertise to local governments, either on long-term contract or a fee-for-service basis.[32] One promising customer base includes CCs that lie within LAAR provinces but were not included in the project. CCs outside LAAR's eight provinces are also potential customers, although development of that market may take longer. New provincial and district councils that will be starting up operations in June 2009, will be better financed than communes, are also potential customers. There should be no shortage of potential work for the PNGOs.

The team did not find any evidence that the Ministry of Interior plans specific efforts to sustain the LAAR approach in CCs beyond those presently covered. But it may well do so indirectly as discretionary funds are made available to new provincial and district councils. These units will surely need significant outside expertise (in the form of training, coaching, technical support) to discharge many of their new duties. Who better to provide such assistance than PNGOs that have honed their knowledge and skills in LAAR?

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[32] We found one PNGO that had already started providing services to CCs in a province other than the one it had contracted with LAAR to work in. There may be others also.

The hope is that CCs will decide that key LAAR activities are sufficiently valuable that it will be worth some effort to keep them operating after the project itself closes down at the end of FY 2010. In particular this would include the CMCs but also the social development orientation.

As noted above, the CMCs are likely to become LAAR's most vulnerable legacy, dependent as they are on totally voluntary labor input from their members and often consisting of younger people who face multiple demands in their lives. CC members told us they valued their CMCs, which is important. But it seems unlikely that most councils will value them sufficiently to expend the time, effort and even perhaps cash needed to keep the committees active. Consideration of this issue should be given priority during the remaining months of LAAR.

The social development orientation many CCs have adopted to supplement their previous bias toward infrastructure should prove easier to sustain, if their own testimony is to be believed. And the fact that the new provincial and district councils will have social development funds of their own to spend should help significantly in this regard.

4. DONOR/USAID COORDINATION

4.1 Coordination with other donor activities in democratic decentralization

There are approximately 15 "development partners" funding projects related to CCs, including Danida, DfID, UNICEF, the World Bank, GTZ, SIDA, and UNFPA. USAID conducted an extensive needs assessment before initiating the LAAR program in order to avoid overlap with—and to fill gaps left by—the efforts of these other donors. The USAID program's emphasis on accountability, "social development," and requiring matching funds are among its signature features.

Representatives of all other donor agencies with whom the evaluation team met expressed the view that USAID's program is addressing fresh aspects of democratic development with a unique combination of approaches. For example, only LAAR, UNFPA, and UNICEF are focused on social services, rather than projects with other kinds of emphasis (such as poverty alleviation).

A process is underway to design a ten-year National Program for Sub-National Democratic Development in order to exercise the intent of the Organic Law. This design process, led by the Ministry of Interior with support from the World Bank and technical assistance from the Urban Institute and others, affords donors with a focused opportunity for continued and intensified coordination on these themes. Key decisions are being made through a four-stage drafting process that is expected to move forward rapidly during 2009/10. There is consensus that the decentralization process is the most important window of opportunity for advancing all governance (and political) objectives and that USAID should be fully involved in the process.

4.2 Success and value of coordination efforts

Understandably, most donor initiatives are focused on CCs' accomplishment of specific project goals. More effort should be made, however, to help councils establish sustainable, holistic systems and procedures for implementation of multiple projects with funds from multiple sources. In other words, donors should design interventions from the perspective of the CCs trying to fulfill their overall mandate, rather than being project-oriented.

Several development partner representatives expressed the view that donors have the potential of actually doing harm if they overburden the councils with project systems that are not coherent and coordinated. If councils have to respond to multiple sets of unrelated donor procedures, they run the risk of being unable to absorb and effectively manage their existing functions (and potential new functions that may be devolved after May 2009 District and Provincial Council elections).

5. ALTERNATIVE INVESTMENTS TO LAAR AND MAE

Logically, there are at least two questions regarding alternative investments for each project: *For LAAR:* 1) Are there investments outside the decentralization process that promise greater payoffs toward building Cambodian democracy? 2) Are there different investments within the framework of decentralization that promise greater payoffs in building Cambodian democracy? It is difficult, of course, to calculate probable events, and associated costs and benefits, along the *road not taken.* However, evaluation team members share the view that LAAR was the *right interventions at the right time.* In 2005-2006, the project responded the strongest *positive opportunity* in the Cambodian political system, a chance to help shape the institution giving ordinary citizens their best chance to enter the political arena.

Decentralization, viewed as an unfolding administrative/legal process, does not face obvious impediments at this time. In fact, it enjoys the strong support of most national government agencies, prominent politicians, and senior administrators. The greatest matter for concern lies on the political side, where a single dominant party has embraced the commune council structure as a key mechanism for ensuring its control over citizens and institutions. The commune level of governance, combined with a closed list election system, has provided the CPP an ideal political vehicle. Commanding less than two-thirds of the vote nationally, the party has gained control of 98 per cent of CCs. At the same time, a sprinkling of *sangkats* controlled by minority parties, and a substantial number of deputy chief positions for their representatives, gives some credence to CPP leaders' arguments that the party is committed to political competition and democratic change.

USAID could have adopted a "principled" position and avoided direct contact with commune councils. For example, implementers could have worked exclusively with provincial- and district-level NGOs on the demand side of transparency and accountability. Pessimists could muster a range of arguments for why this would have been prudent: "Elected leaders will be 'looking over their shoulder,' afraid to move on anything without prior clearance from party headquarters." "Leaders are 'old dogs unable to learn new tricks,' too old and set in their ways to absorb new democratic practices." "Councils are creatures of the CPP, little better than democratic window dressing." "More effective commune governance will strengthen the CPP, postponing the arrival of true democracy." Each assertion has a satisfying internal logic.

But optimists won the day, presumably with arguments on the order of: "The commune level of governance is virtually the 'only game in town,' offering the best chance to help ordinary citizens enter the political arena." "Introducing concrete mechanisms for citizen participation and transparency will make a difference, by creating new traditions and new expectations on the part of citizens." "Providing temporary support to the CPP may simply be a price that has to be paid." "Democracy isn't built in a day, it is a process, and compromises have to be made."

The most important point is that the available evidence substantially supports the optimists' view: The "old dogs" have learned new tricks. Even chiefs and councilors in their 60s, with political careers extending back to the Vietnamese occupation, speak with pride of their new skills in fostering citizen participation. There is little evidence that chiefs and councilors are "looking over their shoulder" and awaiting guidance from party officials. Project activities have been implemented almost entirely in CPP-controlled communes, and they appear to be shifting the essential nature of governance in those communes. This may be a useful first step toward making the CPP more amenable to local transparency and accountability, and may even play a role in injecting more democratic procedures into party operations. A degree of faith in the innate attraction of democratic values such as participation, transparency, and accountability, coupled with effective project implementation, appears to have paid off.

6. KEY RECOMMENDATIONS FOR THE REMAINDER OF LAAR

As noted above, at least some PNGO partners have potential as purveyors of services—training, coaching, technical guidance—to CCs and new district and provincial councils. The PNGOs should be supported in making plans to undertake this new role. The evaluation team encourages Pact staff to develop a strategy to help partners assess their capabilities and willingness to undertake this kind of work. A national workshop could help leaders and staff of the 13 PNGOs consider a range of issues: What services do we have to offer to communes and other local governments? How can we find clients/market our services? What changes do we need to make to deliver those services directly? How do we feel about offering services on a contractual or fee-for-service basis?

Institutions in the Philippines could play a useful role in designing and implementing such a workshop: Venture for Fund Raising is a consulting group that helps NGOs and other non-profits develop strategies for sustained financial support of their programs.[33] The Gerry Roxas Foundation (an NGO) and the Holy Name University (a Catholic institution) are regional institutions that have developed successful programs as service providers, both including a substantial number of local governments in their client base. These institutions might be called on for assistance in planning and facilitating a national workshop. In addition, USAID might want to help PNGOs to develop service delivery practices by providing matching funds as they as they market their services to a first round of local government customers.

LAAR has benefited from five DAT assessments, a recent opinion poll of citizens and local leaders, collection of results data, and this evaluation. Documentation includes Pact's quarterly and annual reports, separate inputs into USAID portfolio reviews and results reporting, innumerable field reports produced by PNGOs and Pact staff who visit partner communes, and this report. Despite this massive amount of information, the evaluation team recommends that Pact adopt a *modest research agenda* for the project's final year. There are crucial issues not yet well understood and important questions so far unanswered.

A few modest studies will help to guide LAAR implementation in the final year, document project impacts, suggest strategies for ensuring post project sustainability in partner communes, and derive lessons learned for future USAID local government programming. Suggested studies include:

- *SDP case studies:* Rapid appraisals, each lasting about one week, could be undertaken in about 20 communes (two or three per province). These studies would provide detailed insights into how completed social development activities were designed and implemented, would offer concrete examples of how projects succeeded and/or failed in meeting their goals, and would assess the efficacy of project activities both for democracy building and practical problem solving.
- *Comparative study of planning documents:* A comparative assessment of CIPs, budgets, and other planning documents can be undertaken as a desk study. The identity of communes can be masked, and a standard protocol used to rate the documents for: clear exposition of problems and goals, responsiveness to citizen needs, gender sensitivity, and probable impact on economic and social development. A sample of about 100 LAAR and 100 non-LAAR communes should be sufficient for valid statistical comparison and determination of whether or not LAAR outreach and social development activities have improved the ability of partner communes to make and implement formal plans.
- *Follow-on citizen polling:* Team members recommend that Pact seek expert guidance on getting maximum benefits from the second round of citizen opinion polling.

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[33] This group is already a sub-grantees of a USAID-funded program operated by the East West Management Institute.

The team encourages Pact to work with PNGOs to develop and implement a series of *planning-for-sustainability sessions* as a major focus for final year activities:

- Help CCs develop *minimal-cost outreach strategies:* CCs, CMC members, CBO activists, and village chiefs can be assembled, supported in reconstructing and critiquing outreach activities undertaken earlier, and encouraged to brainstorm on the subject of "how we can repeat these efforts at minimal cost." Pact can offer a small 1:1 matching fund, say a maximum of $100.
- Help CCs develop *strategies to sustain ongoing SDPs* and initiate new social development activities with local resources. Assemble the groups described above, help them to disaggregate the ongoing SDP into specific activities.
- Support community dialogues regarding the future of the CMCs, emphasizing the need to sustain their *functions*, and not necessarily their current organization and membership. Consider a series of focus questions: "How have we benefited from having a CMC in this commune (and village)?" "Who has paid the cost of having this committee?" "Which services of the committee are most important to preserve?" "How can we make sure those services are provided in the future?"

Evaluation team members believe the social development program, as conducted to this point, has succeeded to a substantial degree. SDPs provide a satisfying culmination of the outreach process. Having convened numerous public dialogues, listened to and recorded the views of hundreds of citizens, and analyzed and prioritized those views, commune leaders then plan and implement a social development activity that is broadly responsive to citizen demands. For a year or two, citizens have the satisfaction of knowing their concerns have been heard, and concrete actions taken. Up to a point, this is good.

The majority of SDPs that have come to the attention of the team focus on public outreach programs; incorporate a wide, often diverse, set of activities; and often rely, unrealistically, on the willingness of individuals to alter their behavior through goodwill or simple acquisition of new knowledge. The team is concerned that many SDPs will fall short of expectations, accomplish less than promised, and begin to create a degree of doubt, even cynicism, in local citizens. The momentum of democratic change will be slowed. With this likely shortfall in mind, the team urges Pact to consider some possible refinements in implementing the last round of SDPs under LAAR:

- Identify *clusters* of CCs that plan to work on similar SDP themes, then help them by finding groups that are working effectively on those themes, either in Cambodia or nearby countries. Borrow extensively from those groups, seeking their expert advice, training and reference materials.
- Develop and deliver a standardized *tool kit* that catalogues concrete, practical responses to the three to five most common themes so far identified by partner communes.
- Develop a revised SDP *planning and implementation methodology* for CCs that incorporates more focused, productive, realistic interventions, with measurable (or observable) impacts.

7. EVALUATION TEAM REFLECTIONS ON THE FUTURE OF USAID/CAMBODIA'S LOCAL GOVERNANCE PROGRAMMING

The evaluation team understands from discussions with USAID staff that the feasibility of providing assistance to new district and provincial councils will be assessed during planning for the Mission's next strategy period. The RGC's willingness to bring a moderate degree[34] of representative governance to these administrative levels is an experiment worth supporting and we encourage USAID to give early, serious consideration to the possibility of working closely with these councils.

But team members are also concerned about the interim period between the time new councils are elected (in May) and sworn in (probably in June) and initiation of USAID's next strategy. We agree with expert observers in Phnom Penh who believe the first year or two of the new councils' operation will be fraught with challenges, some of which may threaten the stability and emerging democratic character of Cambodian governance. There are likely to be disputes between the new councils and appointed administrators as the former begin to review and approve budgets and perform other oversight functions.

Ordinances passed by the new councils may be inappropriate or illegal, or may be on target, but meet strong opposition from appointed officials or their cronies. Some councils may dishonor their new role through corruption, while others may remain upright, but be accused of corruption by administrators they call to task. The danger lies not only in the probability that these problems will arise, but also in the possibility they will elicit hasty responses from national policy makers—e.g., overly restrictive regulations and procedures imposed on councils, abrupt administrative action against councilors who are unfairly accused of corruption, etc.

The team has not developed an extensive set of prescriptions for activities during this interim period, but we do have a few thoughts:

- A *rapid field appraisal (RFA):* One danger is that a few missteps by a small number of councils can give rise to a misleading impression of systematic failure, and bring inappropriate responses. A tendency toward pessimism and hasty responses can be addressed by a data gathering technology (the RFA of local governance) already used successfully in Asia. Periodic visits by carefully prepared appraisers to a cross-section of provinces and districts; semi-structured interviews with councilors, administrators, civil society activists, business people, and ordinary citizens; and timely, balanced reporting of both problems and emerging good practices; can inform policy making and public opinion in a useful way at relatively low cost.[35]
- *Visiting mentors:* USAID might coordinate with the Ministry of Interior in appointing a small cadre of senior experts, generally individuals who have held either elected or senior administrative positions in local government, each to serve as mentor/advisor to small group of chiefs of the new councils. Individuals would be in-country periodically, say for a few weeks each quarter, and might be drawn from the U.S. or other countries in Asia.[36]
- *Quick response mediation:* USAID might coordinate with the Ministry of Interior and the Justice Ministry in securing the services, on a standby basis, of a small group of international mediation experts experienced in settling disputes in Asia. The mediation efforts would generally be very

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[34] The RGC has opted for the *closed list* system, for *indirect election* by 11,000 commune councilors, and for *appointed governors* for both districts and provinces.
[35] This approach has already been applied successfully in the Philippines under the USAID-funded GOLD project and in Indonesia under a USAID grant to The Asia Foundation.
[36] U.S. government programs such as the International Executive Service Corps and Peace Corps, and regional organizations such as the League of Cities, League of Provinces, and League of Municipalities in the Philippines might be tapped for respected leaders to participate in this activity.

informal, aimed at getting disputing parties—e.g., legislators and administrators, councilors representing different parties, or government officials and representatives of the business community—to return to patterns of collaboration with minimal fuss.

The evaluation team encourages USAID to continue support for local governance programming as a significant facet of DG support during the next strategy period. There are at least three reasons to continue activities in this area:

- Local governance is *fundamentally important* for continuing Cambodia's halting, but real progress toward democratic governance. The commune is the level, at which the vast majority of Cambodians interact with their political/administrative system.
- We believe USAID, and its partners, can continue to play a *uniquely useful role* in local governance programming after 2010. Many important resources have been developed and proven their practical value in strengthening local governance—e.g., training materials on outreach and social development, familiarity with financial and other administrative procedures, partnerships with local NGOs, and experience in working with counterparts in provincial and district administration—are already in place, and can be extended to CCs across the country without the need for heavy additional investments in design or field testing.
- USAID has already achieved a significant degree of *respect and trust* among colleagues in the RGC, donor community, and civil society for its work in this sector, and can build on this in initiating new programs to work with CCs and district and provincial councils.

Evaluation team members feel it is important for USAID staff to consciously build on resources—e.g., training materials and partnerships with PNGOs—that have been generated under LAAR, but encourage them to consider a full range of programming modalities. It may be appropriate to work with local councils by: providing *vouchers* to access training and advisory services; partnering with *local government leagues* and helping them to organize such services as peer training, action research, and customized web searches; making specific efforts to foster the entry of for-profit firms into the market for local government service provision; or working closely like minded donors such as UNICEF.

ANNEX A: SCOPE OF WORK

Strengthening Governance and Accountability Program
Scope of Work/Work Plan

Introduction

This evaluation is being conducted under the terms of the original omnibus Scope of Work established in USAID/Cambodia's 2006 contract with Checchi Consulting Inc. covering a series of evaluation and design tasks. This particular task covers the evaluation of the Mission's support for Strengthening Governance and Accountability under the broad program areas of Good Governance and Civil Society. The purpose is two-fold. First, the activities will be examined to determine their continuing relevance, effectiveness, cost-effectiveness, impact and the likelihood of their sustainability. Secondly, recommendations will be made regarding the value and utility of continuing the Mission's work in local governance strengthening and anti-corruption activities at the local level, the possible scope of any new work in this sector, and mechanisms the Mission might consider for supplying such support, if any is recommended.

Activities for Evaluation

The activities for evaluation include:

Local Administration and Reform [LAAR]: Planned funding is $14.4 million.

Component 1 of the Strengthening Governance and Accountability (SGA) Program, the Local Administration and Reform (LAAR) Program, is nearing the mid-point of the fourth year of its five year design. In year two LAAR expanded its reach from 69 communes in three provinces to 230 communes in eight provinces. In year three, it further expanded its coverage to cover a total of 356 communes in these provinces. Overall, LAAR now operates in 3,389 villages representing approximately 3,167,532 people. Five national-level partners have assisted in promoting greater understanding of women's roles in leadership and local governance, the importance of citizen participation, and enhanced communication between government and civil society particularly related to decentralization and de-concentration.

Fourteen provincial-level partners are on contract to implement the program at the grassroots level in eight provinces. All partners have received extensive training and coaching to build their capacity to guide and mentor commune councils, civil society, and citizens in good governance practices, focused on civic participation, partnerships between government and civil society, transparency of local government activities and budgets, and accountability of local government to its citizens for decisions made and actions taken. Sixty-nine USAID/LAAR social development projects were completed by commune councils in the first year, applying principles of good governance in the implementation thereof. Two hundred and thirty commune councils have received grants to enhance outreach to their communities and to institute increased transparency they have installed and used notice boards in 2205 villages, including posting of official land and civil registration fees to prevent corrupt practices in fee collection. The communes also received a first SDP grant, to implement a project identified through a participatory process, designed to promote engagement between citizens and commune councils. In 2008, grants to support commune council community outreach were provided to an additional 126 expansion communes and contracting for 356 SDP sub-grants is presently nearing completion (2nd year funding to 230

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communes and 1st time SDP's to 126 communes) with an emphasis on SDP's producing measurable, visible and durable outcomes.

Mainstreaming Anti-Corruption for Equity Program Planned funding in $4.2 million

Component 2 of the Strengthening Governance and Accountability (SGA) Program, Mainstreaming Anti-Corruption for Equity (MAE), is nearing the mid-point of the third year of the four year design. All countries and all governments are affected by corruption. However, it is the ability of a Government to acknowledge and mitigate the negative affects of corruption that will determine success in generating economic, social and political stability. The USAID Anti-Corruption program should not be viewed as a race of relatively short duration but more as the running of a triathlon that requires endurance, mixed skills and a comprehensive but flexible strategic approach.

In March 2007 Phase One of USAID's Anti-Corruption program, implemented by PADCO/Pact, came to an end. By the end of the second quarter of FY2007 USAID's Phase Two MAE program, through close collaboration with USAID, was launched to advance previous efforts to build political will to pass an international standard Anti-Corruption Law by mobilizing civil society organizations, engaging with business and the private sector, coordinating with donor partners, and strengthening independent media and investigative journalists. Over the last year MAE has assisted in "mainstreaming" anti-corruption within local civil society programs and other USAID partner programs.

Key Elements of the Evaluation

The following elements and related questions are drawn from the overall SOW of the USAID/Cambodia–Checchi Consulting contract and from communications with members of the USAID/Cambodia staff regarding their expectations for this evaluation.

Relevance: Cambodia is a rapidly changing country, both economically and socially, emerging from a recent past that can best be described as apocalyptic. The decentralization policy environment continues to evolve, with elections to new sub-national councils slated for May 2009. The set of activities being evaluated have been under implementation for some time. What was the development hypothesis and what were the assumptions and expected impacts by January 2009 in the original design? Have they proven to be true? If not, why not? Have the activities been adapted to any major changes in context or the needs of their beneficiaries? How was the choice of communes made? Can there be a more strategic selection process to promote the aims of USAID? Is it possible to postulate the continuing relevance of these activities in future years given the worldwide recession now underway? What impact has the LAAR Program had on decentralization and the reform of local governance?

Effectiveness: Did these activities meet their original targets? Have these targets been modified and what have been the results? Were the initial expected results achieved? If not, why not? If the targets were modified, why? What obstacles were encountered in meeting the targets and how were these overcome (or if not, why not)? What activity monitoring systems are in place to determine effectiveness of the activities; are these systems useful and reliable?

Impact: How have these activities impacted (or not) immediate stakeholders and beneficiaries? (e.g., Local leaders, ordinary citizens, civil society activists, commune councils, and sub-national government officials?) Have there been changes in KAP (knowledge, attitudes, and practices) vis-à-vis democratic values in LAAR target communes? How have these activities impacted (or not) the broader civil society, government, and the private sector? Have these activities produced unintended consequences--either positive or negative? Have the approaches and activities remained basically the same over LOP so far, or

has it been found necessary to modify them as the program moved along? If so, why and in what ways? Can we undertake a very rough cost/benefit analysis? Have results and benefits been achieved at acceptable cost? Are there alternative approaches that would produce greater benefits at the same or lower costs? How do we know these things; what evaluative tools were put in place (baseline data; periodic assessments) to judge progress? Has the program reached Muslim populations? Has there been a quantifiable impact on Muslim Cambodians that can reasonably be assessed?

Sustainability: What is the definition of sustainability that best fits each of these activities? What is the most-likely timeline to create sustainability in each case? What is the role of private sector actors/service providers – both local and international - and the RGC and sub-national level government in each case? Is there a continuing role for the donor community; if so, for how long? What are the overall post-EOP prospects for this program to affect future development in Cambodia in terms of replicable experience, lessons learned, RGC/sub-national level government support and other donor interest, so far as can be ascertained at this point in time? How many expatriate staff are salaried under this agreement?

Alternative Investments: What are the specific impediments to decentralization in Cambodia? What can USAID best offer to support this goal? Is this the best use of resources to promote decentralization/democracy in Cambodia? What are other potential valuable investments?

USAID/Other-Donor Coordination: What has been the nature and effect of coordination among these activities? How have they coordinated with other relevant USAID activities? Are other donors working in these communes? How do they
coordinate? What has been the overall value of these coordination efforts? What is the value of LAAR for other donors?

Overall Recommendations: This section will be guided by the following questions. Is continued support to any of the activities under evaluation warranted? Are there other activities that might be more valuable or more effective in strengthening local governance, decentralization and democratic development in Cambodia? What major impediments stand in the way of achieving gains in these sectors? What modalities would best serve the Mission's continued support, if any, of these sectors?

Methodology

The evaluators will rely on a number of sources and techniques to answer the questions posed above, including:

Document review: The activities under evaluation have been thoroughly documented. The evaluators will also review documentation that provides information on indicators, targets, and progress toward achieving those targets (both objectives and impact) for all activities under review. Periodic reporting and any other relevant documentation will be reviewed.

Interviews and Observations with Implementing Organizations: Meetings will be held with managers who oversee and monitor progress of these activities for USAID. Interviews will be conducted with the managers and staff of the implementing organizations. The work of the implementers will be observed in action.

Interviews with Beneficiaries and Affiliated Implementing Partners: Interviews will be held in the field with provincial government officials, local leaders-commune councilors, ordinary citizens, and local civil society activists who have been affiliated with the implementation process or are direct beneficiaries, to gain an understanding of their view of what they have gained from these activities and its value to them or

their organizations. The approaches used will be a combination of individual and small group interviews, group discussions, and where possible, observation of meetings or other community governance activities.

<u>Interviews with the Donor Community:</u> Interviews will be conducted with those donors who are active in the local governance strengthening, civil society strengthening, and anti-corruption areas to gain a better understanding of the scope of their activities and their plans for the future that may either impinge on or complement USAID actions in these fields.

For each activity, responsible donors and implementers will be consulted to obtain needed documentation and to obtain lists of potential contacts for interviews. The evaluators will consult with key responsible individuals, both at head offices and in the field, to assure full collaboration with the evaluation process. They will consult with USAID and PACT colleagues before making a final decision about which communes to visit for evaluation of field activities.

Time Frame and Deliverables

Documentation review and telephone interviews with PACT headquarters staff will take place during the Week of February 23-27. Work in Cambodia will be conducted from March 5 through March 25, 2009. The team will participate in in-briefings, progress updates and a final outbrief outlining major findings and recommendations as scheduled by USAID. Submission of the draft final report will be made no later than April 13, 2009. A revised final report will be submitted to USAID/Cambodia no later than two weeks after receipt of comments from USAID/Cambodia.

Timeline of In-Country Work

Week of February 23-27**:** Obtaining key documents, making key contacts and planning for interviews and discussions in Cambodia with project staff, beneficiaries, RGC officials, other donors and other USAID project reps as needed. Most of this work will be done through email and Skype. Mike Calavan, visiting with family in Texas, and Harry Blair in Connecticut will make as many arrangements for the March field visit as possible, including a few telephone interviews with PACT head office staff.

The team will work though USAID and activity Chiefs of Party to set as many meetings and interviews as possible prior to arrival in Cambodia. A part-time local hire will be brought on board to assist with this process.

<u>Field Work - Week One: March 5 - 11:</u>

The focus at the beginning of this period will be on meeting with USAID, the staff of PACT, gathering and reviewing data not already available, and solidifying plans for visits to rural communes. In the latter part of this week we will begin the interview process with beneficiaries and others. Key dates are as follows:

Mar 4: Calavan arrives in country
Mar 5: Blair and Barr arrive in country; In-brief at USAID

<u>Field Work - Week Two: March 12 - 18:</u>

The focus of this entire week will be on interviews and discussions with beneficiaries, donors, government officials, representatives of related USAID projects and others who work with or have been impacted by the activities under evaluation. Team members will visit and assess activities in at least six

communes that have been involved in project activities. Those selected will vary by level of isolation, relative wealth, and other key qualities. As time allows, the team will begin preparing the first few sections of the final report on the background, setting and previous evaluative efforts related to the set of activities under review.

<u>Field Work - Week Three: March 19 - 25:</u>

Any remaining interviews will be completed. Follow-up meetings to discuss questions arising from the interviews and to clarify and remaining issues will be held with the implementation teams for each activity. The balance of the final report will be drafted, to the extent possible. Key dates include:

Mar 23: (or another date of USAID's choosing) Review of findings with USAID/Embassy staff
Mar 24: Submission of current version of the draft final report
Mar 25: Evaluation team members depart Cambodia

<u>Post Field-Work:</u>

April 13: Submission of the completed draft final report

The final report will be submitted no later than two weeks following receipt of final comments from USAID/Cambodia.

Report Outline

The following outline mirrors the structure of the scope of work described above:

1.   EXECUTIVE SUMMARY: key findings and recommendations

2.   CONTEXT

2.1   Cambodia's political and social situation
2.2   The Cambodian government system
2.3   Commune government within the national system

3.   THE ACTIVITIES (original structure, funding, objectives, key indicators of progress, key changes)

3.1   Local Administration and Reform
3.2   Mainstreaming Anti-Corruption for Equity

4.   PREVIOUS FINDINGS (from formal evaluations and other reviews)

4.1   Local Administration and Reform
4.2   Mainstreaming Anti-Corruption for Equity

5.   RELEVANCE (hypotheses and assumptions behind each program still valid?; have activities adapted to any changes in context or changes in needs of beneficiaries?)

5.1   Local Administration and Reform
5.2   Mainstreaming Anti-Corruption for Equity
5.3   Have changes in country context made other potential activities more relevant than those under

evaluation?

6.   EFFECTIVENESS (are activities meeting targets?; obstacles to meeting targets and how these have been overcome (or not); effective progress monitoring systems?)

6.1   Local Administration and Reform
6.2   Mainstreaming Anti-Corruption for Equity

7.   IMPACT (impact of the activities on immediate stakeholders and beneficiaries; and on the broader civil society, government, private sector; and unintended consequences? – positive or negative; what measuring tools are available to judge impact? – against what baseline are results being measured?; have results been achieved at acceptable cost or are there alternatives that would improve efficiency?)

7.1   Local Administration and Reform
7.2   Mainstreaming Anti-Corruption for Equity
7.3   The overall impact of this set of activities in the Cambodian setting

8.   SUSTAINABILITY (can these activities survive the end of funding by their respective donors – if that was the plan; if not – why not?; if the RGC was to come to the fore, are they doing so as planned?; future private sector involvement?)

8.1   Local Administration and Reform
8.2   Mainstreaming Anti-corruption for Equity
8.3   Other issues related to sustainability in local government and anti-corruption activities

9.   ALTERNATIVE INVESTMENTS (what are the specific impediments to decentralization in Cambodia? what can USAID best offer to support this goal? is this the best use of resources to promote decentralization/democracy in Cambodia?)

9.1   Local Administration and Reform
9.2   Mainstreaming Anti-Corruption for Equity
9.3   Other potential investments

10.   DONOR/USAID COORDINATION

10.1   Coordination among this particular set of activities
10.2   Coordination with other USAID activities
10.3   Coordination with other donor activities in the labor or productivity fields
10.4   Success (or lack thereof) and value of coordination efforts

11.   KEY FINDINGS AND RECOMMENDATIONS

11.1   Local Administration and Reform
11.2   Mainstreaming Anti-Corruption for Equity
11.3   The future of USAID support to local government activities in Cambodia
11.4   The future of USAID support to anti-corruption activities in Cambodia

ANNEX B: REFERENCES

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ANNEX C: INDIVIDUALS INTERVIEWED

Paul Mason	Country Representative, Pact Cambodia
Chhor Jan Sophal	Chief of Party, LAAR, Pact Cambodia
Donald Bowser	Chief of Party, MAE, Pact Cambodia

[Note: Dozens of staff members of Pact, and of PNGO partners under the LAAR project, provided valuable information]

Erin Soto	Mission Director, USAID/Cambodia
Reed Aeschliman	USAID/Cambodia
Paul Randolph	USAID/Cambodia
Roy Fenn	USAID/Cambodia
H.E. Sak Setha	Secretary of State, Ministry of Interior, Government's focal point for governance reform
H.E. Leng Vy	Director-General, Ministry of Interior, local governance focal point for the Ministry
Mr. Pok Sokundara	Secretary General, National League of Communes/Sangkats
Per Nordlund	SIDA
Stevens Tucker	SIDA consultant
Yolande Wright	Danida
Cheap Sam An	Danida
Tom Wingfield	DFID
Katherine Huebner	GTZ
Shelley Flam	GTZ
Julia Rees	UNICEF (local governance)
Deborah Kimble	National Local Governance Program Formulation Team
Scott Leiper	Senior National Advisor, UNDP/PSDD
Mehr Latif	The Asia Foundation
Praiwan Limpanboon	The Asia Foundation
Sedara Kim	Cambodian Development Research Institute
Thida Khus	Executive Director, SILAKA

Battambang Province, Rattanak Commune Office

Tinh Keang	Male	Commune Chief	Prey Loung Commune
Sambath Sok	Male	Commune Chief	Norea Commune
Man Ril	Male	First Deputy Commune Chief	Norea Commune
Yoeun Yous	Male	Commune Chief	Rattanak Commune
Soun Sapin	Male	First Deputy Commune Chief	Rattanak Commune
Bunheang Bun	Male	Commune Councilor	Rattanak Commune
Thavy Kea	Female	Commune Chief	Toul Taek Commune
Hem Nget	Male	Commune Councilor	Toul Taek Commune
Neng Mil	Female	Commune Councilor	Toul TaekCommune
Sotoeun Sari	Female	Commune Councilor	Ou Char Commune
Sreypirum Kong	Male	Second Deputy Commune Chief	Ou Char Commune
Muntha Heang	Female	Commune Councilor	Anlong Vill Commune

Battambang Province, Provincial Office

El Say	Deputy Governor

Battambang Province, Phteah Prey Commune

Mong Sao	Commune Chief	
Ly Tan	First Deputy Commune Chief	
Chhin Tanh	Commune Councilor	
Sarin Poung	Commune Councilor	
Hoeum Ka	Commune Councilor	
Chanleang So	Second Deputy Commune Chief	
Sangheng Doung	Commune Councilor	
Socheat Chan	Commune Councilor	
Sokleurm Soeng	Commune Clerk	

Pursat Province, Snam Preah Commune

Bunseurn Um	Male	Commune Chief	CPP
Korn Peang	Male	Commune Councilor	CPP
Chek Kong	Male	Commune Councilor	CPP
Sopat Preap	Male	Commune Clerk	--
Mao Tang	Male	Commune Councilor	CPP

Pursat Province, Ou Ta Paong Commune

Chhon Meng	Female	Commune Councilor	CPP
Sorl Sang	Male	Commune Councilor	CPP
Chorn Chum	Male	Commune Councilor	CPP
Chhung Ear	Male	Commune Councilor	CPP
Rom Soung	Male	Commune Councilor	CPP
Nhoem Kheav	Male	Commune Councilor	CPP
Min Yin	Male	Commune Councilor	CPP
Sam Oul Phorn	Male	First Deputy Commune Chief	SRP
Mao Theang	Male	Second Deputy Commune Chief	NRP

Pursat Province, Kbal Trach Commune

Chab Som	Male	First Deputy Commune Chief	CPP
Loeng Pol	Male	Second Deputy Chief	CPP
Samoeun Doeb	Female	Commune Councilor	CPP
Chea Svay	Male	Commune Councilor	CPP
Sarun Ngoun	Male	Clerk	--
Chhoeun Duk	Male	Commune Councilor	CPP

Pursat Province, Anlong Tnout Commune

No Touch	Female	Commune Chief	CPP
Lai Pin	Male	First Deputy Commune Chief	CPP
Biseak Lim	Male	Commune Councilor	CPP
Lit Em	Male	Commune Councilor	CPP
Soeun Men	Male	Second Deputy Commune Chief	SRP
Tun Meas	Male	Commune Councilor	CPP
Sevla Bin	Female	Commune Councilor	CPP
Tanglay Bung	Male	Commune Clerk	--

Pursat Province, Sna Ansa Commune

Soda Nam	Female	Clerk
Kou Hek	Male	Commune Chief
Yut Tuy	Male	Second Deputy Chief

Sai Meas	Male	First Deputy Chief
Pen Hin	Male	Commune Councilor
Han Rous	Male	Commune Councilor
Vuthy Tuy	Female	Commune Councilor
Hun Kouk	Female	Commune Clerk

Pursat Province, Meeting with CMC Members and Community-Based Organization (CBO) Leaders

Sokha Yong	Male	CMC	Veal Vong
Lim Em	Male	CMC	Beng
Sokhorn Brach	Female	CMC	Sna Ansa
Kea Sor	Male	CBO	Kompong Prak
Tang Sor	Male	CBO Vice-president	Kompong Prak
Saret Moung	Male	CBO President	Svay Sor
Setha Sout	Male	CMC	Anlong Kdam
Chhin Sorn	Male	CMC	Krang Veng
Rin Chou	Male	CBO	Kompong Prak
Ngun Long	Male	CMC	Tmey
Laiheang Pai	Female	CMC	Chie Ches

Pursat Province, Lolok So Commune

Bunkea Korng	Female	Commune Chief
Hunkea Korng	Male	First Deputy Commune Chief
Sareth Yun	Male	Commune Councilor
Choeun Chum	Male	Commune Councilor
Souy Pen	Male	Commune Councilor
Nat Kov	Male	Commune Councilor
Sovanna Som	Female	Second Deputy Commune Chief
Han Un	Male	Commune Councilor
Sami Men	Male	Commune Councilor
Voeun Yoem	Male	Clerk
Salout So	Male	Commune Councilor
Voeun Yoem	Male	Commune Councilor

Pursat Province, Anlong Tnout Commune, Meeting with CMC Members and CBO Leaders

Saroeun Mok	Male	CMC President
Vary Thoung	Male	CMC vive-president
Pav Cheam	Female	CMC Member
Sopan Sok	Female	CMC Member
Kin Kong	Female	CMC Member
Sarith Mok	Femals	CBO Leader
In Bil	Male	CMC Member
Hong Hem	Male	CMC Member
Vorn Yin	Male	CMC Member
Chhem Keo	Male	CMC Member
Silang Lanh	Male	CMC Member
Chhon Mao	Male	CBO Leader
Vin Hoem	Female	CMC Member

Pursat Province, Kbal Trach Commune, Meeting with CMC Members and CBO Leaders

Hern Leng	Male	CMC Member	Trapang Rumdenh Village

Savin Long	Male	CBO Member	Chher Teal Kpous Village
Samut Tou	Male	CMC Member	Krolanh Village
Sopheak Chea	Female	CMC Member	Chher Teal Kpous Village
Soroem Duk	Female	CMC Member	Trapang Trach
Nhanh Nhean	Female	CMC Member	Kandal
Kimlob Lao	Female	CMC Member	Doung
Mao Poeun	Male	CMC Member	Sre Resey
Chhean Loek	Male	CBO Leader	Chher Teal Kpous
Saty Hou	Male	CMC Member	Psar
Yun Koen	Male	CBO Leader	Totoeng
Uosman Ly	Male	CBO Leader	Psar
Vannak Chhoem	Male	CBO Leader	Kandal Village

Pursat Province, Prey Sdey Commune, Meeting with CMC Members and CBO Leaders

Kimthun Leang	Male	CBO	Uo Tkov Village
Sokom Sin	Female	CMC	Uo Tkov Village
Sopat Chhao	Female	CMC	Kaoh Village
Sao Oeun Pen	Female	Citizen	Lolok So
Chanheng Nouk	Male	Citizen	Tnol Chopun
Teang Mom	Female	Citizen	Tnol Chopun
Men Hem	Male	CMC	Doub Bat
Savorn Oeung	Female	CBO	Dom Nak Ompil
Bora Nhem	Female	CBO	Chum Rumseam
Chantu Hen	Female	Citizen	Loung Pagoda
Rith Koun	Male	CMC	Toul Mkak
Sovannary Rous	Female	CBO	Peal Nhek
Bora Mao	Male	People	South Chamka Chek
Peng Long	Male	CMC	North Chamka Chek
Channy Nhoek	Female	CMC	Tnout Tret
Channy Sok	Female	CBO	Chamka Chek
Vannaret Srey	Female	People	South Chamka Chek

Pursat Province, Krang Leav Commune Office, Non-LAAR Communes

Seoun Touch	Male	Commune Chief	Krang Leav
Choun Svay	Male	Commune Councilor	Krang Leav
Pheng Chin	Male	First Deputy Chief	Krang Leav
Ham Nget	Male	Clerk	Krang Leav
Paung Ung	Male	Second Deputy Chief	Krang Leav
Mit You	Male	Commune Chief	Trapoang Krosang
Pen Sim	Male	Commune Councilor	Trapoang Krosang
Sam Heng Eath	Male	Commune Councilor	Sophy
Sokheang Chea	Male	Commune Chief	Sophy
10Thos Kim	Male	Commune Councilor	Sophy

Svey Reng Province, Pteah Kandal Commune, Meeting with CMC and Ordinary Citizens

Srey But		CMC member	Pteah Kandal Leur
Leng Chan		CMC Vice-president	Pteah Kandal Leur
Savan Tai		Ordinary Citizen	Pteah Kandal Leur
Narin Doem		Ordinary Citizen	Pteah Kandal Krom
Tavy Pouk		CMC member	Uo Leav
Sam Ang Wen		CMC member	Uo Leav

Sambath Oy	CMC member	Pteah Kandal Krom
Soeun Sorn	CMC President	Pteah Kandal Leur
Saret Seur	CMC member	Pteah Kandal Leur
Nan Chan	CMC member	Pteah Kandal Krom
Toyona Pav	CMC member	Pteah Kandal Krom
Roeung Ngan	Neighborhood Leader	Pteah Kandal Leur
Mun Lun	Ordinary Citizen	Pteah Kandal Leur
Van Ket	Neighborhood Leader	Pteah Kandal Leur
Van Ven	Ordinary Citizen	Pteah Kandal Krom
Sreng Sear	Pagoda Committee	Pteah Kandal Krom

Svay Reng Province, Meun Chey Commune Office

Savin Ouk	First Deputy Commune Chief	Meurn Chey Commune
Saman Norng	Commune Councilor	Meurn Chey Commune
Sophol Nhean	Commune Councilor	Meurn Chey Commune
Sarun Nhean	Commune Councilor	Meurn Chey Commune
Reurn May	Commune Councilor	Meurn Chey Commune
Va Norng	Councilor Chief	Meurn Chey Commune
Chhorn Meng	Commune Councilor	Svay Chek Commune
Sam Art Pen	First Deputy Commune Chief	Kompong Chak Commune
Savan Sorn	Commune Chief	Kompong Chak Commune
Sytha Seuk	Commune Councilor	Svay Chek Commune
Ye Kim	Commune Clerk	Svay Chek Commune
Kay So	Commune Chief	Svay Chek Commun

Pong Tuek Commune

| Long Nuo | First Deputy Commune Chief |
| Dara Tun | Commune Clerk |

Bos Morn Commune

Seng Sin	Commune Chief
Moeun Sok	First Deputy Commune Chief
Dan Chan	Second Deputy Commune Chief
Kean Lim	Commune Clerk
Vantha Mao	Assistant Commune Clerk

Provincial Meeting

Kean Mao	Male	Deputy Chief of PLAU
Pav Ut	Female	Save the Children Fund EFD
Nath San	Male	Provincial Works Dept.
Bam Harm	Male	Consultant
Romnea Vy	Male	SPPA/UNDP

Kampong Cham Province, Meeting with Service Providers

Vannareth Prum	Nokor Phnom Community Finance Officer
Narom Dok	Deputy Director of Provincial Department of Women's Affairs
Veasna Chhon	Executive Director (SDAB)

Kampong Cham Province, Meeting with citizens in Ta Prok Commune

| Seurn Sou | Male | CMC President |
| Kon Hem | Male | CMC Member |

Nan Ny	Female	CMC Member	
Houy Horn	Male	CMC Member	
Chhem Chhet	Male	Youth Representative	
Oeurn Chhet	Male	Village Chief	
Sakana Chhun	Male	Teacher	
Savon Khim	Female	CMC Member	
Sythan Din	Female	Holland Bridge Organization	
Pan Hean	Female	CMC Vice-President	

Kampong Cham Province, Ta Prok Commune

Sokum Klout	Male	Commune Chief	CPP
Lang Morm	Male	First Deputy Commune Chief	CPP
Hun Prak	Male	Second Deputy Commune Chief	SRP
Cheam Man	Male	Commune Councilor	CPP
Sathat Chung	Female	Commune Councilor	CPP
Nun Nik	Male	Commune Councilor	CPP
Vannavat Oun	Male	Commune Clerk	--

Kampong Cham Province, Thmor Poun Commune

Sang Leng Oem	First Deputy Commune Chief
Mey Som	Commune Councilor
Sotoeun Preap	Commune Councilor
Chantou Meach	Commune Councilor
Soknav Mom	First Deputy Commune Chief
Penh Koun	Commune Councilor
Vat Pring	Commune Councilor
Sath Nhem	Commune Councilor
Savy Ngin	Commune Chief

Kampong Cham Province, Svay Teap Commune

Bunlong Kim	First Deputy Chief	CPP
Ton Nin	Commune Councilor	CPP
Chheng Prum	Commune Councilor	CPP
Kim Thol Dang	Commune Councilor	SRP
Sareun Pen	Commune Councilor	SRP
Leng Tai	Commune Councilor	SRP
Hon Heng	Commune Councilor	SRP
Kim Mol Chhov	Commune Councilor	CPP
Yat Yoeng	Commune Chief	CPP
Bunpa Sman	Commune Councilor	CPP
Sambo Chheng	Commune Clerk	--

Kampong Cham Province, Vihear Thom Commune

Srim Chuong
Kimsan Mom
Thol Then
Moeun Mey
Chhuor Meas
Meng Arn Kum
Chhei Heang Rous
Sinal Chin

Kampong Cham Province, Meeting with Government Officials

Khim Chao	PFT	Kong Meas
Va Meas	PFT	Srey Santhor
Bunlorn Sok	PFT	Chamkar Ler
Savuth Sum	PFT	Prey Ler
Longheng Krey	Deputy Director Provincial Treasury	
Det Em	PLAU Representative	

Kampong Cham Province, Tonle Bet Commune (came from another commune)

Yet Long	Commune Chief
Yon Chan	Second Deputy Commune Chief
Heng Kert	Commune Councilor
Leang Tuek	Commune Councilor
Chhai Mey Toun	Commune Clerk
Run Hem	First Deputy Commune Chief
Noeun Hor	Commune Councilor

Kampong Cham Province, Tonle Bet Commune

Lang Heng	Commune Councilor
Tai Hot Touch	Commune Councilor
Chhun Pin	Commune Councilor
Meng Leap Kroch	Commune Councilor
Sok Koeun Seng	Commune Clerk
Savy Sman	Commune Councilor
Ton Nat	Commune Councilor
Kim Hean Hoy	Commune Councilor
Sokunthea Yous	Commune Councilor
Lout Kong	Second Deputy Commune Chief
Ratha Chan	Pact officer

Kampong Cham Province, Krala Commune

Mrs. Yasoeun Srey	Commune Chief
Mr. Nov Sok	First Deputy Commune Chief
Sophy Moch	Second Deputy Commune Chief
Un Soeng	Commune Councilor

Kampong Cham Province, Pteah Kandal Commune

Mach Van	Second Deputy	SRP
Morn Lun	Commune Councilor	SRP
Sambath Kruy	Commune Councilor	CPP
Mouy Keang Bun	Assistant Commune Clerk	--
San Kim	Commune Clerk	--

Kampong Cham Province, Angkor Ban Commune

Sokho Toem	First Deputy Commune Chief	SRP
Seiha Nhoem	Commune Councilor	SRP
Kouy Mach	Commune Councilor	SRP
Lim Py	Commune Councilor	SRP
Sarun Och	Commune Councilor	CPP

Khuy Seng	Commune Chief	CPP
Seak Hour Kong	Commune Councilor	CPP
Chheang Hong Art	Commune Councilor	CPP
Vann Chheng	Second Deputy Commune Chief	NRP

Takeo Province, Baray Commune, Youth Focus Group Discussion

Sok Buntheoun	Farmer, Male, Age 27
Pech Chhayna	Farmer, Male, Age 18
Pich Srey Oun	Farmer, Female, Age 20
Sous Samneang	Student, Male, Age 20
Peouo	Jobless, Male, Age 19
Sesa Lideth	Student, Male, Age 23
Noun Chan Viriakboth	Student, Male, Age 18
Sok Sreymom	Student, Female, Age 17
Keo Chanthy	Farmer, Female, Age 47
Chun Chansy Oun	Jobless, Female, Age 15

Takeo Province, Prey Khla Commune, Commune Council Focus Group Discussion

Pheoung Phan	Commune Councilor, Female	CPP
Pech Chhim	Commune Councilor, Male	CPP
Houv Pon	Commune Chief, Male	CPP
Un Som Ol	Commune Clerk, Male	--
Phan Chheng	Second Deputy, Male	SRP
Keo Eat	Commune Councilor, Male	SRP
Lin Lan	Commune Councilor, Male	CPP
Sok Houl	Commune Councilor, Male	CPP

ANNEX D: ASSESSMENT: MAINSTREAMING ANTI-CORRUPTION FOR EQUITY (MAE)

In this section we first consider MAE's origins and early initiatives, then assess the program's current situation and prospects.

Program context

The first external assessment of MAE argued Cambodia's environment for reform is "characterized by a profound absence of political will to address corruption."[37] Given the evident level of corruption in Cambodia and the lack of progress to date in addressing it, the assessment's clear implication is that the challenge facing any donor-supported effort to attenuate corruption is immense.

Corruption has indeed been pervasive and is arguably becoming more so, while the political economy supporting it has become increasingly well entrenched. As to the extent and depth of corruption itself, a few statistics will illustrate: Transparency International's Corruption Perception Index, which began including Cambodia in 2005, initially rated the country at 130th out of 158 countries, with a score of 2.3 (out of a possible 10). In the following years that score steadily declined to 1.8 by 2008 for a ranking of 166th of 180 countries.

The political economy that has produced such high levels of corruption has been well described as a dual system consisting of a surface level of democratic practice and a deep substratum of neopatrimonialism, clientelism, and cronyism reinforced by a feeble civil society. The latter is largely incapable of providing any counterweight against corruption, enabling the state to become largely unaccountable.[38] Given the twin factors of corruption and political economy, it is scarcely surprising that political will has been hard to find. The state has felt obliged to fire off rhetorical cannonades against corruption over the years (e.g., Hun Sen's call for anti-corruption legislation in 1995 and repeated calls for strong action from high level government officials), but the artillery employed has used blank shells. At several points the RCG has promised to enact an Anti-Corruption Law (ACL), and one was indeed drafted in 2005 with Pact assistance. But so far the pledges have come to naught. Recently, an ACL has been promised for the spring of 2009, but there is no great expectation that the legislation will be passed despite strong pressure from the donor community.

Fighting Cambodian corruption must be considered a Herculean struggle, but USAID's assumption, along with that of other donors, continues to be that it is not a hopeless one. Indeed, despite a generally disappointing record of anti-corruption initiatives thus far, there have been bright spots, indicating that an improved MAE program can make some progress.

Project background

The MAE project represents a follow on to an earlier project titled the Anti-Corruption Coordinated Action Program (ACCAP), which ran from December 2004 until March 2007 and was also implemented by Pact. The new project, beginning operations in March 2007, was designed to run through FY 2010. It continues many ACCAP activities (e.g., the Clean Hand campaign) and adds a number of new ones. Its intent was to focus on:

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[37] ACAT, Inception Report (2007), p. 1. The ACAT used the phrase "profound absence of political will" six times in this first report and three times in the second one.

[38] See Hughes and Un (2007), also Calavan et al. (2004). One manifestation of this process has been the decreasing political competition observed in an earlier USAID report on Cambodian political parties and electoral processes (see Blue et al., 2008)..

- Expanding civil society efforts to bring in the private sector, including extractive industries;
- Strengthening journalistic capacity to focus on corruption;
- Helping the RGC to craft a Freedom of Information policy paper as prelude to an FOI law;
- Launching a strategic advisory body to be called a "think tank";
- Integrating the program with LAAR so as to include coverage at the commune level;
- In general facilitating the mainstreaming of anti-corruption practices across all USAID programming.

In essence, the program has focused on two objectives: raising public awareness about corruption, and building demand for public sector reforms to curb corruption.

By the end of FY 2008, MAE had largely dropped its corruption awareness efforts and had come to concentrate on strengthening the demand for reform. Staff signed a Memorandum of Understanding with the Ministry of National Assembly and Senate Relations and Inspection. Programmatically, efforts proceeded on both *general* and *targeted* levels. The more important general initiatives were:
- A Million Signature Campaign demanding an ACL, timed to end shortly before the 2008 national election campaign began in earnest (an all-party pledge to pass an ACL can be attributed at least in part to the publicity generated by the campaign).
- The Clean Hand Brand strategy promoted behavioral change with its ubiquitous logo decals and handouts.

Civil society organizations and campaigns targeted toward specific constituencies included:
- The Clean Business Initiative, aimed at the commercial sector;
- A CSO focusing on natural resource extraction industries;
- A Freedom of Information Working Group, an FOI policy paper, and efforts to support and reinforce journalistic coverage of corruption (e.g., the Corruption Monitor);

In addition, Pact had by the end of 2008 sponsored four opinion surveys addressing corruption issues:
- The Corruption Perception Barometer, designed by Transparency International (TI) and conducted by the Center for Social Development in mid-October 2005;
- The Anti-Corruption Campaign and Clean Hand Brand Report, done by Indochina Research in mid-October 2006;
- A Corruption Barometer survey done with TI in 2007; and
- A second Corruption Barometer survey with TI in mid-December 2008.

As with LAAR, Pact contracted for periodic external analyses of the MAE program, and by the time of this assessment, two reports from the Anti-Corruption Advisory Team (ACAT) had appeared, in July 2007 and May 2008. The first report recommended developing a long-term sustainable approach in this difficult sector, identifying more specific entry points for MAE efforts, and increasing program staff. It also offered some 15 secondary recommendations, ranging from reconsidering the Think Tank to building a relationship with a stronger ministry like Interior. The second report found MAE picking up momentum and urged staff to concentrate on "segmenting markets" – aiming activities at specific constituencies who could drive the AC enterprise.

MAE management in 2009
In early 2009, a new chief of party assumed direction of MAE, and the evaluation team believes the project is currently in good hands. Experienced and energetic Cambodian staff and a chief of party widely respected for his professional knowledge, ensure that activities can be guided in any appropriate direction. Project activities until now have made major contributions to the *demand side* of anti-corruption work, providing concrete information on the corruption challenge, and giving various constituencies—civil

society organizations (CSOs), businesses, and ordinary citizens—initial opportunities to air their concerns.

There is some hope that final passage of the Anti-Corruption Law is near. If and when passage comes, MAE staff must be prepared to shift gears. They must keep up the demand side pressure, now focusing on energetic enactment of all provisions of the law, but they should at the same time begin devoting significant attention to the *supply side*, seeking opportunities to assist the RGC in putting new institutions and more transparent systems in place. MAE has already begun moving in that direction.

Current activities under MAE

MAE is currently conducting focus group sessions to elicit citizen perceptions of corruption in all of Cambodia's 24 provinces. Staff are facilitating five sessions in each province: three citizen groups that include some CMC members, one composed of members of a single CC, and one group of youth from a single commune. During the field trip, team members attended two sessions in Takeo Province: one consisting of CC members, the other a youth group.[39]

Evaluation team members were impressed by three facets of the observed discussions: 1) MAE staff members were very skillful in leading participants toward *frank discussion* of corruption issues. Candid opinions and observations were forthcoming within 15 minutes of the start of each session. 2) Detailed descriptions of particular corruption scenarios were elicited quickly. In both discussions, half a dozen detailed descriptions emerged within the first 35-40 minutes. 3) Ordinary Cambodians displayed striking levels of knowledge regarding specific corrupt practices. Their discussion reflected fairly sophisticated analysis of what corruption is, and is not, and how their lives are impacted by various forms of corruption.[40]

Both discussion groups made an interesting and (in their context) useful distinction between what Americans would regard as *extortion* and *gratuities.* Examples of the former include a traffic policeman who demands a bribe not to report a trumped up violation, or a health center aide who sells pharmaceuticals widely known to be intended for free distribution. But when an official provides a birth certificate or an ID card, most participants in the observed discussions opined that a modest payment is appropriate, much as an American would tip a waiter or bellboy. A clear manifestation of this view was the CC chief who first asserted forcefully that he and CC colleagues follow regulations on probity and corruption to the letter, then went on to note that "if a citizen wants to give a pack of cigarettes after receiving a form, or chooses to present a cash gift equivalent to 1 per cent of the sale price after a land sale is certified, it's the person's right to do so."

Assuming that focus groups in other provinces are similarly effective at eliciting detailed information on perceptions and practices, MAE will be able to assemble a very useful catalogue of current *corruption scenarios* as experienced by ordinary Cambodians. We can anticipate some regional variations—natural resource predation as the most salient issue here, land grabbing there, venality in the customs service in a third place--as well as pronounced urban-rural differences—police extortion as a major complaint in many cities, non-attending school teachers in some rural areas. However, as the findings emerge, the composite picture with its variations should prove helpful in crafting efforts to support RGC reforms after passage of the Anti-Corruption Law.

In addition to the Million Signature Campaign, Clean Hand Initiative, the Corruption-Free Cambodia

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[39] Neither commune was among the LAAR sites visited in Takeo. It would have been useful to visit MAE focus groups in LAAR locations, but it proved impossible to achieve such a combination.
[40] Readers may find our mention of "sophisticated analysis" somewhat surprising, but in fact most Cambodians have for more detailed knowledge and experience in this area than ordinary Americans or Europeans.

(www.saatsaam.info) website, and the Corruption Monitor newsletter, demand side activities under MAE have included:

- Launch of CSOs, including the Coalition of Civil Society Organizations Against Corruption, the Cambodians for Resource Revenue Transparency, and the Freedom of Information Working Group;
- Public forums on corruption issues in Phnom Penh and the provinces;
- Support for demand-generation activities in conjunction with the Voice of Democracy and Anti-Corruption Day, and the Global Organization for Parliamentarians Against Corruption.

Demand-side activities aimed specifically at passage of the Anti-Corruption Law include:

- A series of anti-corruption concerts;
- An anti-corruption film festival;
- A carefully phased "Countdown to the Anti-Corruption Law" calibrated to reinforce public and media attention to efforts to pass the Law;
- A "timed release" series on findings from the Corruption Barometer survey conducted in conjunction with Transparency International in December 2008.

These activities, implemented through scores of sub-grants, have brought corruption issues before the public eye (and ear): e.g., "Clean Hand" stickers were on display in numerous settings during the evaluation team's field trip, and thousands of articles on corruption issues, many specific to Cambodia, and others treating the issue in other countries, are published in Cambodian periodicals every year. There appears to be a steady stream of information available to ordinary citizens. However, the evaluation team challenges Pact and USAID staff to develop plans to expand the stream to a flood. In particular, when information products have already been produced—training modules, newsletters, pamphlets—managers should seek every possible avenue for dissemination.

One facet of current work under MAE is an effort to move to a less confrontational approach, by helping RGC counterparts "think beyond passage" of the Anti-Corruption Law. A series of activities will encourage government officials to start planning to meet administrative challenges that will arise soon after passage of the law, such as appointment and legal establishment of an Anti-Corruption Commission. MAE staff are prepared to bring regional experts to Cambodia as part of this effort, and after passage of the Law, may arrange for study tours to commissions in the region.

Corruption "risk assessments" will also be part of a supply-side emphasis. By adopting a future orientation, and focusing on risk rather than corruption, this approach avoids specific accusations of corruption. Instead, it supports senior administrators in identifying practices that may be prone to corrupt acts, and proposes specific solutions to head off those acts: e.g., an assessment can help senior Ministry of Health officials to identify vulnerable points in health delivery where potential corruption can be averted. By encouraging officials to examine hypothetical situations, rather than making specific accusations against line functionaries, government units can be assisted in closing off some doorways to corruption: e.g., more effective inventories of pharmaceutical supplies before and after delivery to district health centers can reduce theft and illegal sales. The evaluation team believes this one-step-at-a-time approach to controlling corruption from the supply side is both doable, and a sensible first step toward controlling rampant corruption.

The RGC has been contributing in its own way to this supply-side approach. The CPP, along with other parties agreed before the July 2008 election to pass an Anti-Corruption Law within a year. In early 2009, the RGC renewed this promise. Earlier, in 2007, a preliminary Freedom of Information policy paper was drafted, putting the RGC on record as supporting a law in this sector as well. Efforts like risk assessments will hopefully help convince the RGC to put these declarations of purpose into effect.

However, even if the Anti-Corruption Law is passed within the next few months, Pact and USAID should proceed with caution and avoid over optimism. A central assumption behind MAE has been that concerted public perception can, if appropriately articulated, exert positive and sustained pressure on the state to undertake serious reform. It is assumed that a consensus national view of anti-corruption priorities emerges from the ongoing focus group exercise, and that this will be a powerful resource in pressing the state toward reform. But this may be an over optimistic view.

The CPP-dominated government may be able to continue providing a facade of reform while avoiding serious efforts to achieve it. The 2008 TI Corruption Barometer survey reported that in 2007, 29 percent of respondents thought "the government's actions in the fight against corruption" were "effective." A year later, fully 67 percent of respondents gave that optimistic answer.[41] Assuming the survey samples were properly selected, this massive swing is best explained in the context of the national election in July 2008, roughly midway between the 2007 and 2008 polls. During the campaign, the CPP managed to convince many voters it was taking concerted actions against corruption, an impressive public relations feat given the absence of any credible evidence that abuses actually decreased. The point is that it may be relatively easy for the state to feign reforms and convince most citizens that real change is occurring. The uphill struggle to contain and reduce corruption may be even steeper than previously assumed. The evaluation team encourages Pact staff to move ahead vigorously, but retain a healthy level of skepticism in collaborating with government reform efforts.

Relevance of MAE for Cambodia

Evaluation team members believe that MAE currently operates under the following development hypotheses:

1) Cambodia lacks both the political will to vigorously pursue corruption—e.g., by passing an Anti-Corruption Law—and a sufficiently strong civil society coalition to demand reform.
2) Donor efforts to directly confront the RGC and demand passage of an anti-corruption law have proven unproductive, and solidarity on this issue has eroded.
3) The best course for the present is to continue to bolster the *demand side* of reform from *outside*—e.g., through research on mechanisms and costs of corruption; wide, frequent information dissemination; and bringing new constituencies (e.g., the business community) on board.
4) Both Cambodian civil society and ordinary citizens on one side, and donors on the other, need to press for passage of the Anti-Corruption Law.
5) The *demand side* for passage of the law can also be bolstered *inside* the RGC: e.g., workshops engaging senior RGC officials on practical issues that will arise "beyond passage" can help to make passage a *fait accompli*.
6) Beyond passage, MAE can assist the RGC on dual tracks: 1) Support establishment of key institutions such as an Anti-Corruption Commission through study visits and provision of expert advisors; and 2) Support specific reform efforts on a flexible basis, as opportunities arise. Risk assessments can provide an entry into key institutions, and corrective actions can be initiated "one institution (or administrative system) at a time."
7) Over the medium term, RGC officials can be convinced that authentic efforts to curb corruption will encourage economic growth and enhance Cambodia's international legitimacy.

We believe this formulation represents an appropriate, and potentially effective, strategy at this time. After passage of the law, the project, and the hypothesis that underlies it, will need to be reformulated.

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[41] See TI/Pact, "Corruption Barometer, Cambodia" PowerPoint presentation, 15 January 2009, slide 12.

However, it is not clear whether passage of the Anti-Corruption Law will come before MAE's planned completion date. It will be prudent for USAID and Pact staff to develop multiple scenarios for project completion, depending on when the law is passed. At least one scenario should allow for an extension of funding beyond the current completion data.

Effectiveness of MAE in Cambodia

MAE managers rely on standard USAID DG indicators for rule of law, public advocacy, anti-corruption, civil society strengthening, and media to track implementation progress. In general, the indicators measure *inputs* (e.g., public seminars organized or advocacy campaigns supported) or *outputs* (e.g., CSOs interacting with the legislature or trained journalists publishing articles). They are adequate to enable managers to track progress under the project.

Impact of MAE on Cambodian governance

The indicators below are Cambodia- and MAE-specific, and represent an effort to measure impacts of project activities. These quantitative measures do not record *direct* impacts on corruption, but do provide useful insights into movement toward such impacts. It is useful to know that 40 businesses have made a public commitment to follow ethical practices. Although that number falls short of firm evidence that the firms will actually follow through, it does suggest the anti-corruption movement, based largely on CSOs, has gained a powerful new ally.[42]

The knowledge that thousands of articles on corruption are being published annually does not clearly prove that genuine progress is being made against corruption, but does suggest movement in the right direction. The large number of articles does demonstrate that: journalists are willing to write on the topic; editors are willing to publish on the topic; citizens are being exposed to new information; and the government is (currently) willing to tolerate public criticism.

MAE Management (Impact) Indicators

Indicator No.	Indicator	OP Target FY08	Actual FY08	% Achieved FY08	OP Target FY09
2.2.4.e	Number of anti-corruption or regulatory reforms adopted (including but not limited to ACL, FOI, EITI, etc.)	1	0	0	1
2.4.1.i	Number of private sector firms actively supporting "Clean Business" as demonstrated through signing clean business treaties	50	40	80	80
2.4.1.h	Number of companies adhering to clean business principles	TBD	-	-	60
2.4.2.c	Number of investigatory articles published on anti-corruption topics by MAE-trained journalists	60	160	267	100
2.4.2.d	Total number of articles on corruption published in Cambodia.	120	6236	5197	5000

The evaluation team's key findings regarding effectiveness and impacts of MAE are as follows:
- The project has made a mark through recent and ongoing activities (e.g., Million Signatures, Clean Hands, the Saat Saam website, the Corruption Monitor) and made many Cambodians more aware of corruption issues.

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[42] Indicator 2.4.1.h is intended to capture the impacts following from 2.4.1.i, but this will inevitably require a more complex measurement strategy, and collecting the needed information may be too time-consuming to be useful.

- Ongoing focus groups are providing a clearer understanding of citizen concerns and careful analysis and presentation of the results can produce knowledge that will inform and sharpen action planning.
- Staff are devising a viable demand-side strategy to promote passage of the Anti-Corruption Law, combining ongoing and new elements.
- The major challenge is to craft a practical post-passage strategy to expand to supply-side activities, garner RGC support, and make observable progress against corruption.
- Activities already included in the work plan—an Anti-Corruption Institutional Assessment and sector corruption vulnerability assessments—will be effective elements in helping the RGC to implement the new law.
- It is not clear that any activities currently ongoing or planned under MAE are sustainable without external financial and technical assistance. It is possible that another donor, perhaps the World Bank or Danida, would be willing to step in and fund some current MAE activities. However, the evaluation team feels that it is important for USAID to continue support for this work.

Alternative investments

Logically, there are at least two questions regarding alternative investments for MAE: 1) Are there investments directed at issues other than corruption that might have brought greater returns for building Cambodian democracy? 2) Are there other anti-corruption activities that would be more effective than those undertaken under MAE? It is difficult, of course, to calculate probable events, and associated costs and benefits, along the *road not taken.* However, evaluation team members share the view that MAE has been the *right intervention at the right time.* In 2005-2006, MAE's predecessor project took up the gauntlet against the single greatest *negative challenge* to economic and democratic development in Cambodia—pervasive corruption.

The evaluation team learned that there is a substantial level of "donor fatigue" vis-a-vis Cambodia's massive corruption problems. The problems are widely recognized, and generally viewed as a major barrier to sustained economic development and effective administrative and political reform. A corruption assessment commissioned by USAID in 2004 argued for concerted efforts to elicit positive responses from the RGC by imposing high levels of conditionality across the entire donor portfolio.[43] This recommendation was followed by a round of discussions among donors, but no concrete actions. Since 2004, various donors have attacked this issue through disjointed, short-term interventions and failed. Currently, most donors prefer to ignore this "gorilla in the corner."

In the absence of a coordinated approach by donors, MAE's adoption of a dual demand-and-supply strategy probably makes most sense. If the Anti-Corruption Law is passed within the next several months, Pact staff can support a variety of practical activities to inject greater transparency and probity into specific administrative sectors. Tentative plans by MAE leadership to initiate the supply-side work with assistance aimed at increasing transparency and competition in procurement of drugs and medical supplies strike team members as a reasonable place to start.

Recommendations for the remainder of MAE

- Pact staff should re-assess the project dissemination strategy. Very useful information materials have been developed, but it is not clear those materials reached the largest possible audience. Strategies for "flooding" each appropriate audience with materials should be investigated.
- If the Anti-Corruption Law is passed within the next several months, there will be a crying need for assistance to the RGC to put new institutions and systems in place. There is a real danger that

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[43] Calavan, Michael, Briquets, Sergio, and O'Brien, Jerry.

the completion date on MAE will come at a inconvenient time, with key tasks mid-way in implementation. To avoid loss of momentum, USAID should consider a series of scenarios for completing the project based a various projections of when the Law will be passed.

- In the view of the evaluation team, corruption remains the single greatest barrier to building a strong, resilient economy and a transparent, accountable political system in Cambodia. If necessary, USAID should consider bridging funding for MAE to ensure completion of activities initiated in the final months of the project.

MAE opinion surveys

As noted above, MAE has thus far conducted four opinion surveys on corruption in Cambodia, but in the evaluation team's view it has made very little use of them. After the first three surveys, some few results were released to the media, presumably at a press conference, but that appears to have been the maximum level of effort at dissemination. We could not see that any analytical use was made of them in terms of informing MAE activities. Moreover, the first three evidently had virtually no connection in terms of building on one another in terms of similar questions asked or comparisons of any sort. MAE plans to disseminate the findings of the fourth and last survey, conducted by TI, more gradually so as to have a more widespread impact. And although it did make several comparisons with the third one, also conducted by TI, but in the materials provided to the evaluation team, such comparisons were rudimentary at best.

These surveys are expensive instruments, costing around $70,000 each. Their actual use thus far does not appear to have justified such expense, certainly when compared to what their potential use could be. A new chief of party and a new monitoring and evaluation expert at MAE should be able to make significantly better use of these surveys, both past and future. Dissemination can be much improved, e.g., with present plans for gradually releasing the results of the December 2008 TI survey to the media. Opinion surveys have great potential in uncovering regional patterns (urban, rural, one province vs. another), differing concerns within regions (farmers vs. consumers, parents vs. patients), and changes over time (improvements and declines in perception of various constituencies). Much of this promise can be realized with better analysis.