



Independent Joint Anti-Corruption
Monitoring & Evaluation Committee (MEC)



PROGRESS
MONITORING REPORT
MINISTRY OF RURAL
REHABILITATION AND
DEVELOPEMENT ANTI-
CORRUPTION PLAN

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Acronyms

AC	Anti-Corruption
ACP	Anti-Corruption Plan
AD	Archive Department
ADB	Asian Development Bank
ARID	Afghanistan Rural Institute for Development
PIRoA	President of Islamic Republic of Afghanistan
SMAF	Self-Reliance through Mutual Accountability Framework
ToR	Terms of References
WB	World Bank

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Executive Summary

The Presidential Instruction on Self-Reliance through Mutual Accountability Framework (SMAF) and the National Anti-Corruption Strategy (2017) require Afghan government ministries which generate revenue and make policy to put forward anti-corruption plans. Further, these ministries must report on their progress in implementing their plans to the public. As an independent joint body established to monitor national and international anti-corruption efforts in Afghanistan, the Independent Joint Anti-Corruption Monitoring and Evaluation Committee (MEC) has undertaken the review of the Anti-Corruption Plan (ACP) of the Ministry of Rural Rehabilitation and Development (MRRD).

The MEC's aim for conducting this review is to identify the shortcomings of the MRRD's ACP development and implementation and to provide recommendations for overcoming them. The review found that the MRRD had not conducted a risk-assessment to identify the vulnerabilities to corruption and create a comprehensive plan which would mitigate all identified risks. In addition, the MRRD committee that was assigned to develop the ACP was too small; and most of the key directorates were not involved in the process. Furthermore, MRRD has not communicated the ACP with lower-level employees since many of them did not have information about it. During the review, it was also observed that the Ministry has not assigned a management team to monitor implementation of the activities of the ACP, identify implementation gaps and report findings to the leadership of the Ministry. The MRRD Anti-Corruption Plan has four objectives and nine activities among which three are fully implemented, three others are partially implemented, and the remaining two are not implemented. There are some activities in the ACP that have been implemented in previous years, yet they are included in the ACP during the current year. Meanwhile, there are some activities that are implemented but are not documented.

In order to improve the plan and properly oversee its implementation process, MEC has issued eight recommendations to the MRRD.

Introduction

In 2016, prior to the Brussels Conference on Afghanistan, revenue-generating ministries of Afghanistan were instructed by the President of the Islamic Republic of Afghanistan (PIRoA) to develop their Anti-Corruption Plans to ensure transparency in their operations. In the meantime, the Self-Reliance through Mutual Accountability Framework (SMAF) also requires five revenue-generating ministries to put forward their Anti-Corruption plans and report the progress of their implementation to the public¹. Similarly, policy-making ministries as well as service-delivering ministries, including the Ministry of Rural Rehabilitation and Development (MRRD), were also assigned to develop their respective ACPs.

As a government-led institution, MRRD is mandated to ensure social, economic and political welfare for rural people, reduce poverty through access to social services, improve sustainable livelihood that is not reliant on poppy cultivation and strengthen local governance.²

MRRD functions in 34 provinces, working closely with people in villages.³ The updated *Tashkeel* (an organizational chart detailing all staffing positions and levels) of the MRRD⁴ shows that under the authority of the Minister, there are two Deputy Ministers and 52 Directorates, 34 of which are Provincial Directorates and the remaining 18 function in the center.⁵ In addition, there are more than six national and sub-national programs functioning under the Ministry that cover development projects in rural areas.⁶ According to the *Tashkeel* of MRRD, there are more than 2000 permanent employees in the Ministry. Besides, there are additional contractors who are working in national or sub-national programs for rural areas. To achieve its mandate and bring about social and economic growth in rural areas, the Ministry is required to tackle corruption. The development of Anti-Corruption Plan is a major part of the Ministry's efforts in the fight against corruption.

The ACP of MRRD has four priorities:

- 1. Preventing interference in the planning processes of projects;**
- 2. Enhancement of electronic governance in MRRD;**
- 3. Promoting the culture of responsiveness; and**
- 4. Reducing overlaps of responsibilities between departments by merging them.**

Methodology

¹ Self-Reliance through Mutual Accountability, Annex: Short-term deliverables by 2016
<http://www.mofa.gov.af/mofaj/files/000102254.pdf>

² See: <http://mrrd.gov.af/fa/page/207/40>, last seen Dec 8th, 2017

³ *ibid*

⁴ *MRRD, GIROA, Structure Chart, pg 1, Dec 10th, 2017*

⁵ *ibid*

⁶ (*MRRD, Name of Programs revealed by HR Directorate*)

MEC started review of the MRRD Anti-Corruption Plan in November 2017 and completed the data collection on December 30, 2017. The purpose of conducting the review was to assess the ACP implementation in MRRD, examine its comprehensiveness and to provide further recommendations for the Ministry. To assess the implementation of the ACP, MEC has conducted desk research, analyzed relevant policies, procedures and documents in the MRRD, and interviewed officials. MEC also conducted follow up meetings to get necessary data from the officials. Overall, MEC interviewed 35 high-level and mid-level officials at the MRRD. To verify the accuracy of collected data, MEC also interviewed representatives of media and tried to look for different reports published on the MRRD's activities

The MEC's report on the MRRD's ACP is divided into three sections:

1: DEVELOPMENT PHASE:

The development phase covers all aspects of the planning stage of the ACP.

2: IMPLEMENTATION PHASE:

The implementation phase covers the implementation of the activities listed for every single priority area of the ACP.

3: MONITORING AND EVALUATION PHASE:

The monitoring and evaluation phase reports whether or not the implementation of the ACP is thoroughly followed up by the MRRD.

1. Development Phase

MRRD set up a small committee to create the ACP. MEC's interview with officials and MRRD's anti-corruption plan indicate that members of the committee assigned to create the ACP were: Directors of Monitoring and Evaluation, Internal Audit, Policy and Planning, Administration and the Afghanistan Rural Institute for Development (ARID)⁷. The committee members identified areas vulnerable to corruption based on their experiences and prepared the ACP to cover those vulnerabilities.

The plan consists of four objectives and to achieve these objectives, the committee has listed nine activities in the ACP. MEC's interviews with officials revealed that the MRRD had not conducted a detailed corruption risk assessment prior to the development of the ACP⁸. It is essential that each Afghan government ministry performs a proper risk assessment before it develops its ACP. This will help the ministry allocate its scarce resources to address those corruption vulnerabilities which have the highest impact and likelihood of occurring. Absence of such an assessment by MRRD resulted in a

⁷ MRRD officials, interview with MEC, Dec 3, 2017

⁸ *ibid*

subjective prioritization of vulnerable areas. Therefore, the MRRD Anti-Corruption Plan does not cover overall ministry-wide vulnerabilities and the implementation of activities listed in this plan cannot ensure reduction of corruption within the Ministry e.g. The plan does not cover the entire procurement process. Assessments of MEC in different institutions indicate that procurement function of most institutions are very much vulnerable to corruption. MRRD can hardly be an exception to be overlooked. Moreover, MEC found that the MRRD did not communicate the ACP properly to all relevant departments.

In addition, the general structure of the ACP has some flaws. The activities that the MRRD must implement do not include “SMART” indicators that will help measure the progress of the activities. To measure the progress of each activity listed in Anti-Corruption plan, it is necessary that MRRD should develop specific, measurable, attainable, realistic and time bonded indicators for each of these listed activities.⁹ Similarly, it was noticed that activity #1 under objective #2 i.e. creating the Archive Department, was already accomplished before development of the ACP. Yet, it still is included in the ACP.

On a positive side, it must be mentioned that the MRRD has been active in sharing information with media and the public. This was one of the nine activities included in the ACP. Recently, the MRRD won a “Golden Key” award from the Access to Information Commission, which shows that the Ministry is responsive to the public and media.

2. Implementation Phase

According to the findings of MEC, out of the total nine activities set forth in the ACP, two are “Fully Implemented”, three are “Partially Implemented”, two were “Already Implemented” in the previous years and another two are “Not Implemented”. Activities are either partially implemented or not implemented due to a variety of factors. The main factor identified in this review is the lack of documentation of some actions undertaken by the Ministry. MEC has reviewed every single activity of the Plan through interviews with the relevant units. Below are the MEC’s findings regarding the MRRD’s objectives in chronological order:

⁹ For further information regarding SMART indicators please click on the following link:
<https://www.linkedin.com/pulse/20141022071803-18927814-a-good-start-with-s-m-a-r-t-indicators>

Objective 1. Preventing interference in project planning

Number	Activity	Indicator	Timeline
1	<p>Creating a comprehensive procedure for planning/selecting projects.</p> <p>For selection of projects with high impact, the procedure should have clear indicators and benchmarks considering community participation.</p>	Percentage of work completed to finalize the procedure	March 2017- March 2018

There are many donor-funded programs (contract-based programs) which are currently implementing projects through the MRRD in rural areas across Afghanistan¹⁰. According to the list of Terms of References (ToRs) of the Programs¹¹ in MRRD provided to MEC, the following programs were currently under implementation in MRRD: National Rural Water, Sanitation and Hygiene Program, Afghanistan Rural Enterprise Development Program, National Rural Access Program, Regional Program Coordination Office, Citizen Charter Program and Livelihood Improvement in Tajik-Afghan Cross-Border Areas Program. Some of the mentioned Programs are covering all 34 provinces of the country and some are working at sub-national level, which means that they are being implemented in some provinces or some regions of the country only. Every one of these programs, depending on its scope, implements development projects or provides facilities for villages and rural areas, e.g. basic services to people, creating enterprises, constructing roads, bridges, etc.¹² The officials of the MRRD interviewed by MEC for this review has revealed that one of the corruption risks in the MRRD in regard to implementation of projects in rural areas is the selection of projects and areas in which the projects would be implemented¹³.

When external political influences lead to unequal implementation of projects in certain rural areas, in the long term an unequal development among regions may occur. Rural areas with more political power and influence will get more development projects and facilities and will be ahead of other areas with fewer projects implemented¹⁴. In order to avoid external influence in selecting projects for certain areas and in order to promote equality in developing rural areas, the Plan and Policy Directorate developed a procedure, Planning Process for Selecting Projects (2017), which allows projects to be implemented in the areas that had fewer projects in the past. This procedure, which was shared with MEC, was

¹⁰These programs are supported and funded by different donors like World Bank (WB), Asian Development Bank (ADB), United Nations Development Program (UNDP), Japan International Cooperation Agency (JICA), United Nations International Children's Emergency Fund (UNICEF)

¹¹ List of terms of references of programs functioning under the framework of MRRD revealed by HR Directorate

¹² List of programs working on development projects and providing facilities to different villages across Afghanistan are provided in MRRD website titled "Programs". Retrieved from: www.mrrd.gov.af, November 23, 2017.

¹³ Interview with an official of MRRD, Nov 13, 2017, MRRD)

¹⁴ Interview with an official, Dec 18, 2017, MRRD

developed in 2017 but is still pending the Minister’s approval. After approval, the procedure will become mandatory for project implementation. The procedure clarifies all steps through which a project shall be selected. According to the procedure, people in districts of rural areas as well as provinces will have direct involvement in selecting the projects. However, the procedure’s steps are general, and they need further clarification to ensure that the selected projects have the highest impact¹⁵. This activity is assessed as “partially implemented” mainly because the procedure which was supposed to be in place has been developed but is not adopted yet, i.e. it is not enforceable.

Objective 2. Enhancing Electronic Governance in the MRRD

Number	Activity	Indicator	Timeline
1	Digitalizing the archive system of the MRRD	Percentage development of the digitalized archive system	March 2017-March 2018
2	Starting to assess the finance system in order to create a unified finance system	Percentage development of the finance system	March 2017-March 2018
3	Creating Procurement Management Information System	Percentage development of the system	March 2017-March 2018

Activity 1

One initiative that the MRRD has completed is digitalizing the administrative and archive system. This system is designed to record letters that are sent and received by the Ministry. The system also works on archiving the letters both in soft and in hard copies. The system is designed to be online and is accessible with internet connection only. In case of disruption of power, the system cannot work. Thus, officials still record the letters manually. That helps to avoid missing letters and provide a manual back up¹⁶. Considering the activity and the timeline for its implementation in the ACP, the MRRD has not digitalized the archive system during 2017. The digitalized system has been developed in 2015 and has been in use since then. After 2015, the MRRD has done nothing further to introduce any changes in the system for further development¹⁷. Moreover, the digitalized archive system has been created by an oral order of the Minister and, therefore, there is no formal document showing that the system was created in 2015¹⁸. However, a stone hatched on the wall of the Archive Department (AD) states that the system was developed in 2015. Interviews conducted with the MRRD officials also corroborate that it was developed in 2015. Although AD’s digitalized system was created in 2015, the ACP of 2017 indicates this electronic system is to be created in 2017. Considering the timeline for the activity, this activity was supposed to be implemented in 2017 but it was already completed two years back.

¹⁵ MRRD, GIROA, Procedure on Planning/Selecting the Projects, pp: 1-7 , Dec 28, 2017

¹⁶ Interview with officials in MRRD, November 20, 2017, MRRD.

¹⁷ Interview with group of officials in MRRD, November 23, 2017, MRRD.

¹⁸ *ibid*

Activity 2

According to the ACP, the MRRD planned to start unifying the finance system. However, MEC did not succeed to get information about implementation of the activity from responsible officials in the MRRD. The officials contacted by MEC were not aware of the process. In spite of repeated requests for the necessary data from the relevant department, MEC did not receive any tangible information in this regard. Thus, MEC cannot verify the implementation of this activity.

Activity 3

The MRRD has recently created a Procurement Management Information System. After speaking with officials and observing the developed system and collecting some documents, MEC found that the system was finalized in October 2017¹⁹. When the Management Information System (MIS) Unit finalized the development of the system in the MRRD, the Procurement Directorate (PD) started data entry process into the system. In primary stage of data entry, the system gave faulty error and did not save the entered data which compelled the PD of the MRRD to suspend the data entry process and prompted the MIS Unit to redevelop the system²⁰. As the MRRD has no system engineering procedure (information on what needs to be in the system) that can match needs and requests of the Procurement Directorate (PD), the designated official in the MIS Unit holds meeting with officials in PD and includes their suggestions as points to be included in the system. Though the MIS Unit is re-developing and improving the system, this activity was initially concluded in October 2017. Therefore, MEC considers the assessment of this activity as “implemented”.

Objective 3. Promoting the culture of responsiveness

Number	Activity	Indicator	Timeline
1	Holding press conferences to disseminate information about MRRD's activities to people of Afghanistan	Number of press conferences	March 2017-March 2018
2	Creating a unified centralized information unit for customers/people	Percentage of system development	March 2017-March 2018
3	Conducting client perception survey	Number of reports released as a result of conducting the survey	March 2017-March 2018

¹⁹ List of emails received from procurement department, January 1, 2018

²⁰ Interview with an official in MRRD, January 1, 2017, MRRD.

Activity 1

MEC interviewed officials in the Media and Public Awareness Directorates of the MRRD, who indicate that the Ministry's purpose of holding press conferences is to promote responsiveness, transparency and public awareness. Through its press conferences, the MRRD reveals what it has achieved for the people in rural areas and what it will do in the future. The press conferences take place both in the center and provinces at the project launch stage and after project completion. According to a list provided by the MRRD, during 2017, it has held about 21 press conferences, all of which were for either introducing new or completed projects to the media and people of Afghanistan²¹. This activity is considered as "implemented" because the MRRD has held a number of press conferences in 2017.

Activity 2

The MMRD created unified central information system or Reception Unit for solving customers' problems. It mainly gathers requests from customers, directs them to relevant departments in the Ministry and provides the customers with the responses they receive from departments. Thus, the Reception Unit limits people's direct interactions with officials yet it facilitates information for them.

After speaking with officials in the MRRD, MEC found that the Reception Unit was created five years ago (in 2012) but it was not unified at that time. To manage the work in a better way, the MRRD prioritized unifying this unit in the ACP of 2017²². According to officials in the MRRD, the system was unified in 2017 and has since been working properly. Moreover, while the Reception Unit has been functioning in the MRRD since 2012, it was not under the *Tashkeel*: all the employees in the unit have been non-permanent/non-civil servant employees. After the creation of the Reception Unit, the MRRD has tried to push the Afghan government to accept the unit to perform formally under its *Tashkeel*²³. The Reception Unit has been approved through a directive from the Minister to be included in the *Tashkeel* but it still requires Administrative Office of President's approval to be formally included in the structure. It should be noted that among the state initiatives to fight corruption is the Access to Information Law which is a step toward institutionalizing the fight against corruption. The Access to Information Law is among the easiest ways to allow public to have get information and this legal measure encourages public officers/state agents to keep information of public interest ready. It has long term positive transparency and accountability implication.

Activity 3

According to this activity, the Reception Unit was responsible to create a survey of perceptions of the customers of the MRRD. However, MEC found that there has not been any formal survey conducted of people's opinions. Certain officials from the MRRD claimed that they were not aware of the ACP and, of course, were not aware that such an activity was put in the plan. However, a letter provided to MEC stated that six months prior to MEC's review on MRRD's ACP, through a survey, the Reception Unit collected 306 requests from people who contacted MRRD's Procurement Department and that the MRRD has provided responses to all 306 requests. According to them, they collected these 306 requests

²¹ List of conferences done by MRRD and received from MRRD, December 25, 2018

²² Interview with officials in Reception Unit, Nov 15, 2017, MRRD.) (i.e. Kabul, Afghanistan)

²³ Letter number 6579, dated December 2017

based on an informal survey for which the Reception Unit had a questionnaire²⁴. However, since this survey was not formal, there is no report analyzing its impact and result. Therefore, MEC could not count it as a formal survey considered in the ACP. Therefore, this activity is being assessed as “not implemented”.

Objective 4: Reducing overlaps of responsibilities through merging parallel departments

Number	Activity	Indicator	Timeline
1	Physically merging relevant support departments in the programs with Monitoring and Evaluation Directorate	Number of merged departments	March 2017-March 2018
2	Physically merging relevant support departments in the programs with Administration Directorate	Number of merged departments	March 2017-March 2018

As mentioned earlier, besides some directorates which are under the structure/*Tashkeel* of the MRRD, there are contracting programs in national and sub-national levels that work on development as well as facilitation projects for rural areas and villages in Afghanistan. Since these programs are broad in their functions and provide many projects in different areas and provinces of Afghanistan, they require a wide range of employees to work in different departments (finance, administration, monitoring, HR, procurement and technical). Over the last few years, the MRRD has decided to make reforms through change management. Through this process, the MRRD wanted to physically merge the parallel departments in different programs into the respective Directorates in the Ministry²⁵. After speaking with officials and gathering documents such as Developed Change Management Plan and Procedures, MEC found that the MRRD has physically merged Monitoring and Evaluation as well as Administrative Units of programs with the respective parallel Directorates under the *Tashkeel* of the MRRD. Unfortunately, there is no written documentation showing that the physical merging (shifting employees into one department) took place in 2017. Nevertheless, MEC received a Merging Plan created for 2017 that shows the procedures created in 2017 and a new organizational chart of M&E and Administration Units for post-physical merging activities. After completion of the merging process, departments being affected must follow new instructions and procedures. Since MEC did not receive any documentation to support that the physical merging happened in 2017, the assessment is that both activities have been “partially implemented”.

²⁴ Interview with officials in Reception Unit, Nov 18, 2017, MRRD.

²⁵ Interview with officials involved in change management process, Nov 19, 2017

3. Monitoring and Evaluation Phase:

It is almost impossible to achieve the expected outcome of an Anti-Corruption Plan without a proper monitoring and evaluation system in place. M&E is a widely accepted and established principle in the development of an ACP. In other words, every institution ought to specify and assign a special unit for monitoring and evaluation of the plan that they design to tackle corruption.

MEC findings indicate that the MRRD has not developed a Monitoring and Evaluation mechanism to ensure proper implementation of its ACP. Neither a directorate nor a committee has been given the responsibility to collect and analyze information regarding the implementation process of the ACP.²⁶

Conclusion

In conclusion, the MEC finds that the MRRD did not develop its Anti-Corruption plan based on a corruption risk assessment conducted prior to the development of plan. In addition, the MRRD committee that was assigned to develop the ACP was small in number and limited in expertise and the ACP has not been adequately communicated with the lower level staff. Furthermore, the Ministry has yet to task any department or committee to oversee the implementation process of Anti-Corruption plan.

For further reference, below find MEC's recommendations to the MRRD for both strengthening and implementing the Anti-Corruption Plan.

²⁶ Interview with officials, December 7, 2017, MRRD.

MEC Recommendations

#	Recommendations	Baseline	Status
1	MRRD should conduct risk-assessment and based on the findings of risk- assessment, it should create a new Anti-Corruption Plan by following inclusive approach.	18.Feb.2018 - The MRRD's Anti-Corruption Plan has not been designed and developed based on a risk assessment	
2	MRRD should develop a Monitoring and Evaluation Plan for future ACPs. MRRD should assign a delegate/entity for monitoring and evaluation of the ACP	18. Feb.2018 – The MRRD has not conducted monitoring and evaluation on implementation of ACP.	
3	MRRD leadership should properly communicate its Anti-Corruption plan with the relevant units and all public stakeholders	18. Feb.2018 - The Anti-Corruption Plan of MRRD has not been widely communicated with all departments.	
4	MRRD should develop and adopt SMART (Specific, Measurable, Achievable, Realistic and Time bound) indicators with clear outputs and impacts for the Monitoring and Evaluation of future ACPs.	18. Feb.2018 – The indicators selected for each activity in the ACP, are not clear to be measured.	
5	MRRD should include internal controls in the project design aimed at preventing corruption risks in the projects implemented within the framework of MRRD.	18. Feb.2018 – To prevent corruption risks in the projects implemented within the framework of MRRD, MRRD has put no controlling mechanisms.	
6	MRRD should secure stable power to the Archive Department (AD) to avoid any data loss or system failure.	18.Feb.2018 – The unstable internet connectivity in Archive Department sometimes creates problem in recording data in the system	
7	MRRD should develop an offline data management system at the Archive Department.	18. Feb.2018 - The Current Archive data management system cannot record an offline backup data.	
8	The Access to Information Law requires establishment of permanent Public Information Office with a permanent person that should provide information to public upon request. This will generally help facilitate implementation of the Ministry's ACP	18. Feb.2018 – MRRD doesn't have Public Information office in its organizational structure and currently the Reception office which is also not included in MRRD's organizational structure, handles this duty.	