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A COLLECTIVE ACTION APPROACH AGAINST CORRUPTION: THE CASE OF THE DOMINICAN REPUBLIC

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A COLLECTIVE ACTION APPROACH AGAINST CORRUPTION

The Case of the Dominican Republic

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FOREWORD

Corruption, one of the biggest challenges our world faces today, is bad for development and is a major hindrance to efforts made towards poverty reduction. It affects economic growth and discourages foreign investment. It diverts public resources and distorts governments' policy implementation and programs. It corrodes the relationship between citizens and government and undermines citizen trust.

This all has a disproportionate effect on poor people: Large-scale corruption undermines the quality of public services which poor people in particular depend on, and poor people lose a larger proportionate sum of their income through small-scale bribery.

Yet corruption is not invincible. It is now widely recognized as a major obstacle to development, and many initiatives are in place to counter it.

This case study of the Anti-Corruption Participatory Initiative (IPAC in Spanish) in the Dominican Republic shows how the combination of political will, technical capacity and a broad based coalition of state and non-state actors interested in promoting reforms can yield significant success.

Through the IPAC, governance challenges were overcome, stalling reforms were accelerated and a new social contract was made among the social parties to reduce poverty and increase shared prosperity. The Government now regularly reports back to the citizens, and organized civil society and private sector contribute to policy improvement providing feedback on the implementation process.

The Dominican Republic has not eliminated corruption entirely with the IPAC, and much work has still to be done to address critical governance challenges. But this sound initiative has been certainly a commendable step in the right direction.

We will continue to play our role in supporting this work through the GPSA, and I look forward to hearing how this initiative continues to grow, championing anti-corruption.



Robert Hunja
Director, Public Integrity and Openness,
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Washington, DC March 2015

ABSTRACT

For almost a century, the Dominican Republic has faced considerable governance and corruption challenges. High levels of corruption were present long time ago, and still prevail today, even if their characteristics and manifestations have changed. Rule of law has been weak for a long time, and generally government effectiveness has not been high. By contrast, the country has performed better in terms of progress on fundamental political and civil liberties, and thus relatively speaking it rates satisfactorily in terms of voice and accountability. Civil society faces an enabling environment within which they can operate. Against such background, the innovative and participatory IPAC initiative to improve governance and combat corruption is assessed, taking a relatively broad governance perspective. The paper does not attempt to provide an exhaustive evaluation of all aspects of the single initiative, but its aim is to contribute to the analysis and debate about the benefits and challenges of participatory initiatives promoting good governance and anti-corruption, in the Dominican Republic and elsewhere, while also concretely identifying possible follow-up initiatives. The first section of this paper provides in brief some of the general antecedents on the evolution of governance and corruption in the Dominican Republic. The second section discusses the IPAC strategy. The third and fourth sections present our views on IPAC's achievements and shortcomings, respectively. The concluding section provides some follow-up recommendations.

1. The Evolution of Corruption and Democratic Governance in the Dominican Republic

On Governance and Corruption Challenges in the Dominican Republic

Historically the Dominican Republic has faced serious challenges of misgovernance and corruption, dating back to at least the early decades of the 20th century, when the Dominican Republic transitioned from U.S. military control to the Trujillo dictatorship (Moya Pons 2009). Within the scope of this paper, we do not present a full account of such historical evolution of the country's corruption and governance challenges. There are no metrics to assess corruption trends the Dominican Republic's entire history. However, indicators of governance and corruption do exist for the past fifteen years at least. The data suggests that corruption in the Dominican Republic has steadily worsened (Kaufmann, Kraay, and Mastruzzi 2011), although in part the deterioration may be driven by perceptions and/or the more decentralized and "open" nature of corruption.

The Dominican Republic experienced many decades of corruption under the Trujillo, and subsequently, the Balaguer regimes. Both dictators institutionalized bureaucratic and military corruption in order to remain in power. By the time that the Dominican Republic went through a transition to democracy, various forms of corruption had been institutionalized.

A broader governance-related legacy of the corrupt and autocratic politics of the Dominican Republic's past impacts the power of the presidency. Indeed, the Dominican Republic's history of dictatorships resulted in the institutionalization of a political system that to this day is highly "presidentialist." The President exerts authority beyond the formal institution of the presidency. For instance, the President has significant authority to deviate from budgetary allocations approved by the legislative.

Additionally, rule of law—as measured by available indicators- in the Dominican Republic remains weak. Prior to democratization, the police and the military accrued substantial rents serving the dictator. Once the democratic transition took place these rents did not disappear, rather they morphed over time. Illicit drug trade has become a growing concern, as well as extra-judicial killings (Shoichet and Perez 2011). Nonetheless, some of these troubling developments ought not to detract from the fact that the Dominican Republic's democratic transition has been a positive development compared with its troubled autocratic past decades ago.

With respect to corruption, different sources, such as the summary country measures provided by Transparency International (TI-CPI) and by the Worldwide Governance Indicators (WGI, presented in further detail below), portray a sobering picture of relatively high levels of corruption prevailing in the Dominican Republic. It is also illustrative to focus on more disaggregated sources of data on corruption that illustrate the different types of corruption and bribery.

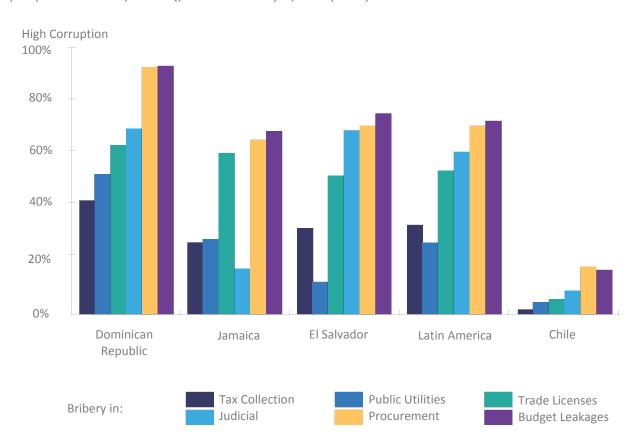


Figure 1: Frequency of different types of bribery and budgetary leakages, Dominican Republic in comparative perspective—data for 2011 (from WEF survey of enterprises)

Source: WEF Global Competitiveness Report, 2011. Margins of error apply, inter alia due to relatively small sample.

For instance, the data from the World Economic Forum—depicted in figure 1—points to a very high incidence of corruption in a number of key dimensions, such as budgetary leakages and procurement bribery, while other dimensions of bribery also present a challenging picture, even if not as high. The data depicted in figure 1 above is also suggestive about the high frequency of corruption in the Dominican Republic compared to the (already high) regional average for Latin America and selected other countries in the region. It would be very important to update these data once available to see whether the current important efforts in procurement reforms, including the opening to civic monitoring across all institutions, is yielding results in terms of reducing corruption.

As suggested, on the upside, over the past few decades the Dominican Republic has exhibited gains with respect to the citizens' political and civil liberties (including electoral politics, freedom of expression and thus more generally enhanced "voice and democratic accountability").

This important dimension of governance can be empirically assessed using the "Voice and Democratic Accountability" component of the WGI. This indicator is the first one presented in table 1 below, where all six governance indicators are featured so to provide perspective and comparison. From the data it is evident that nowadays the Dominican Republic is not merely a notional democracy, but a country where

democratic institutions have attained considerable resilience even in the face of other governance and corruption challenges.

Table 1: Dominican Republic: Trends in governance, 1996–2013 (percentile ranks)

	1996	1998	2000	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Voice and															
Accountability	54.03	50.96	48.08	51.92	53.37	46.63	50.00	47.12	53.85	54.33	52.40	51.18	49.76	52.11	54.50
Political Stability															
No Violence	55.45	42.79	28.37	44.23	45.19	30.29	33.65	38.94	42.31	39.90	43.54	44.08	43.40	47.17	55.45
Government															
Effectiveness	36.36	42.44	30.73	42.93	39.02	34.15	28.78	35.12	32.20	29.13	32.52	32.54	29.67	34.12	34.93
Regulatory															
Quality	48.80	41.67	45.59	44.12	44.12	43.14	38.73	42.65	46.08	47.09	48.06	46.41	47.85	46.92	46.89
Rule of Law	36.97	33.97	34.45	32.54	29.67	30.62	31.58	31.10	34.93	33.01	30.29	25.59	25.12	26.76	29.86
Control of															
Corruption	21.05	54.63	28.78	31.22	43.41	32.68	41.46	35.12	30.73	28.16	29.13	25.84	21.90	23.22	22.49

Source: WGI: A Summary of Data, Methodology and Analytical Issues, by D. Kaufmann, A. Kraay and M. Mastruzzi, October 2011—www.govindicators.org, available at: http://info.worldbank.org/governance/wgi/index.aspx#reports, retrieved on November 21, 2014.

Given the governance challenges in the Dominican Republic, Dominicans' trust in their government effectiveness has not been high or increasing; rather it is to the contrary. The government is seen as ineffective at providing public goods to the citizens; this view is not surprising given the very low tax revenue mobilization (and also seen more broadly in the very low rank in the Government Effectiveness component of the WGI in table 1 above). As a result, citizens have generally low expectations regarding the provision of public goods by the government; many Dominicans are resigned to the provision of "public bads," such as corruption.

Citizens' low expectations in the government's ability to address the problem of corruption may have been compounded by several anti-corruption drives that generally did not deliver tangible results. For decades, Dominican leaders would publicly announce anti-corruption drives and lofty plans to tackle the problem, a pattern which is not uncommon in many corners of the world.

As in some other countries, some of the anticorruption drives were motivated by political expediency and failed to address the deep-seated political and institutional determinant of corruption. In some instances when the afflicted institution has been correctly identified and slated for reform, past reforms may have tended to be partial and incremental and thus not commensurate with the depth of the challenge faced by the organization—such as in the case of the police.

Thus, the deep-seated challenges of governance and corruption in the Dominican Republic have remained entrenched, against the background of powerful but not particularly well governed executive agencies, and a number of un-meritocratic rule of law institutions (Matsuda and Gallina 2013). This is compounded by a weak legislative body. Yet in spite of an overall weak governance environment (with the exception of voice and accountability), some noteworthy reforms have been undertaken, such as the recent civil service career law that has resulted in the professionalization of thousands of public servants. And as we shall see below in some detail, the innovative IPAC initiative is also an important contribution in this context.

Participatory Civil Society Involvement in the Dominican Republic and Beyond: Antecedent to an Anti-Corruption Initiative

It is pertinent to provide a brief background on civil society and the evolution of "voice" in the Dominican Republic in order to understand the broader context of the participatory approach that would eventually take place under the IPAC initiative.

With over 20,000 Civil Society Organizations (CSOs) (United Nations 2005) in a country of less than 10 million people, the Dominican Republic has a high potential for mobilization and participation in confronting the corruption challenge. One indicator of the extent of participation is at the local (municipal) level; Dominicans—together with Haitians- exhibit more participation than any other country in Latin America, as seen in figure 2 below.

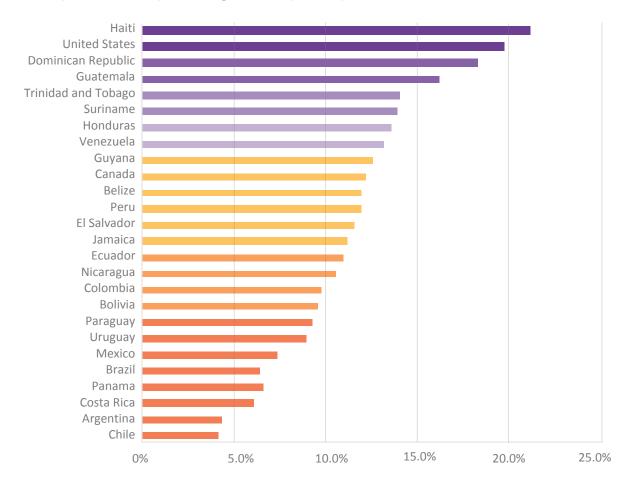


Figure 2: Participation in municipal meetings in 2012, by country

Source: Adapted from Morgan Jana, Rosario Expinal, Mitchell Seligson, "The Political Culture of Democracy in the Dominican Republic and in the Americas, 2012: Towards Equality of Opportunity," Document for USAID, 2012, Vanderbilt University. Original source: Barometro de las Americas por LAPOP, respondents were asked if they have attended a town meeting, a municipal council meeting, or another meeting called by the local government during the last 12 months.

The CSOs in the Dominican Republic are numerous enough that when they act together they can be a highly effective political force (United Nations 2005). Combined with the extent to which Dominicans participate in municipal government, civil society and community engagement represent a significant political force. In practice, their effectiveness as whole is variable, and depends on the issue and type of coalition and CSOs involved. Ultimately, the IPAC was designed to incorporate CSOs into the reform process given their potential political power and the failure of several previous reform efforts.

Approaches to Participatory Anti-Corruption Programs and Brief Review of Some Past Experiences

Before considering the particulars of IPAC it is useful to review how CSOs and the public have been incorporated in anticorruption reforms elsewhere in the world (for a review of experiences, see the table in appendix A). This style of reform is known as a participatory reform; participatory programs differ from traditional anti-corruption programs in that they formally incorporate civil society and the private sector into

the anti-corruption initiatives and programs, usually in some form of collaboration. By contrast, traditional anti-corruption programs do not involve CSOs and tend to be solely driven by the public sector, usually in a top-down manner.

Some development agencies, such as the World Bank, the United States Agency for International Development (USAID), and some others have supported participatory approaches to anti-corruption within countries where some domestic stakeholders request assistance. Underlying these approaches is the notion that there are serious limits to top-down, supply-side (central government) driven approaches; thus incorporating the demand side and allowing for a bottom-up approach that involves the citizenry can be more effective. They can better generate and sustain demand and pressures for reform, as well as monitor implementation.²

Support for this approach goes back to (at least) the pioneering writings on social capital by Putnam (1993, 1995, among others), which suggested that social capital is effective in creating social accountability and control. His studies on civil society in Italy indicated a positive relationship between the strength of civil society and economic development. Around that time, Paul (1996) also showed the importance of demand side programs. He reported on the positive impact that evidence-based monitoring and pressure from the public (through "scorecard" surveys) had on the performance of public projects in Bangalore, India.

In reality some of the divide between supply and demand side approaches to reforms is somewhat artificial. In practice, integration between both the supply and demand, consistent with multi-stakeholder coalition building and collective action, can also generate better results. Relying exclusively on the demand side is unlikely to produce many concrete public sector and judiciary reforms, which by definition require decisions and involvement by the executive, legislative and judicial branches.

In the late nineties some anti-corruption initiatives enacted participatory approaches in a number of countries. Starting in countries like Georgia, Albania, Latvia, and Bolivia, the Economic Development Institute (EDI then, subsequently the World Bank Institute) in collaboration with USAID, supported a participatory approach to the design and implementation of governance and anti-corruption diagnostic surveys. They also supported the subsequent analysis and design of participatory action programs on anti-corruption, called National Integrity Surveys.

The surveys were designed and analyzed by local non-governmental institutions with the support of local and World Bank experts. Once the results were analyzed and made available, multi-stakeholder working groups prepared actionable programs. The results of the diagnostics and the draft recommendations were presented and discussed in national forums on anticorruption with significant participation from civil society and other groups.

This approach was also implemented in a number of other Latin American countries, as well as a group of 7 African countries. In some cases, such as in the anti-corruption programs of Ghana and Colombia, for instance, CSOs continued to be involved long after the national anti-corruption forum. Such in-depth, incountry, diagnostic survey and participatory approaches were implemented in over two dozen countries. While only some programs have been followed by good measurement and evaluation analyses, it is clear that the results vary. In some countries where participation was dynamic, sustained, and backed by political will, reforms did take place; where those factors were absent, reform did not follow.

Even where only a few reforms were implemented, the participatory approach in these programs seems to have been beneficial to civil society and other groups; they were empowered and learned from these new participatory approaches and techniques. Thus, even where reforms were only mixed or proved unsustainable over time, other important benefits accrued.

Some of the rigorous external evaluations of these programs explicitly refer to the importance of these early participatory approaches to generate a broad-based support for anti-corruption programs. Specifically, Leeuw, van Gils and Kreft (1997) indicated that participation in workshops generates awareness and demand for reforms. Yet they also pointed out that participation in itself was not *sufficient* to create reform.

Other initiatives have taken place over the years. Some of these approaches have been at the sub-national level, particularly in many countries in Africa, some in Latin America and in Indonesia. In those programs, civil society tends to be more involved "downstream" as well, namely more directly in the implementation of reforms.

This raises the importance of "unbundling" or differentiating participatory approaches to anti-corruption according to the various phases (upstream, mid-stream or downstream) of an anti-corruption initiative. The early country-wide diagnostic approach described above had a significant participatory component upstream and midstream (diagnostic, assessment, action program design), but much less so downstream—namely the reform implementation stage, which, as we will describe later, was one focus of IPAC.

Yet some of those programs did feature downstream participation by civil society, and many of the subnational programs had strong participatory approaches throughout the program stream. Unfortunately, such country-wide participatory approaches to anti-corruption virtually ceased being used by the latter part of the past decade, in part due to some loss of interest in supporting such in-country in-depth governance and anticorruption programs by many aid agencies. It is against such context that it is of particular interest to review the donor-supported IPAC program in the Dominican Republic.

2. THE IPAC RATIONALE AND ITS BASICS

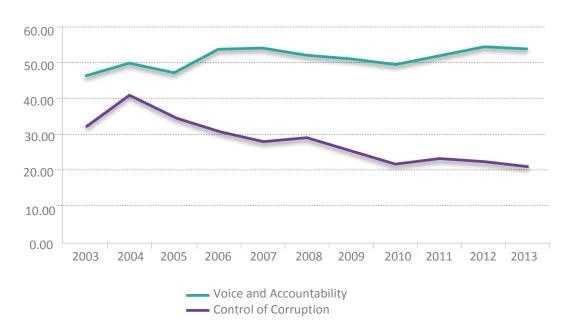
On the Rationale for IPAC

The evidence suggests that a major governance challenge in the Dominican Republic has been corruption and vested interests. By contrast, a relative strength in recent decades is its progress on "voice and democratic accountability." Since civil liberties, voice and freedom of expression (and of the media) are important for a vibrant civil society, and they are important for anti-corruption efforts, it made eminent sense to engage in a participatory anticorruption initiative in the Dominican Republic.

Further, given the increasing apathy, reform weariness, and skepticism about how tractable was the corruption challenge that was setting in among many in the public, it was reasonable to expect that working with important segments of civil society (and particular CSOs), in an increasingly open political environment, could be fruitful. In a simple fashion, the gap between the overall positive evolution of political and civil liberties in the Dominican Republic on the one hand, contrasting the trend on corruption, on the other, is illustrated in figure 3 below. Such simple evidence illustrates the fact that civil society and participatory approaches were viewed as an entry point for anti-corruption programs, as was done under IPAC.

Clearly the governance indicators are rather broad and do not point to what specific type of participation was warranted and at what stage. The IPAC focused on civil society participation during the monitoring and evaluation of reforms stages, though CSOs also had an input during the upstream diagnostic and reform formulation stages. So further exploration is warranted, which is done below.

Figure 3: Dominican Republic: Trends in Governance, 2003–2013 (worldwide governance indicators, percentile rank among all countries) ranges from 0 (lowest) to 100 (highest rank)



What is IPAC?

The Iniciativa Participativa Anti-Corrupcion (IPAC in Spanish—the Participatory Initiative Against Corruption in English) is a multi-stakeholder participatory effort in the Dominican Republic designed to identify and implement a set of activities to strengthen transparency and institutional integrity while reducing the risk of corruption in the Dominican Republic institutions. It engaged representatives from many NGOs and civil society, Government ministries, the private sector, and international development agencies (Guerzovich 2011).

While anti-corruption features prominently in the initiative's title, its stated objectives focused more explicitly on improving transparency and strengthening institutions in the Dominican Republic. If attained, both of these objectives would reduce corruption.

In 2009 the aftermath of another spate of scandals increased public discontent about corruption and led the Dominican Republic government to request feedback from international donors regarding how to address the corruption perception challenge. Some of the donors made the case to government that the time was ripe for a serious and participatory anticorruption initiative.

The government leadership acceded and formally requested assistance for a participatory initiative. Following consultations and some preparatory work, the program started in earnest in mid-2010. The official IPAC resolution was adopted by the government at the end of that year. IPAC was supported by the donor community, in particular by USAID, IDB, UNICEF, AECID, the European Union (EU), and the World Bank—which also had a coordinating role among donors.³

Notably, following the initial preparatory work, the government embraced concrete collaboration and participation from key civil society, NGOs, and the private sector, particularly in the form of social monitoring of the IPAC. Soon this multi-stakeholder participatory approach was evident in the concrete deliverables. By early 2011, IPAC was becoming a collaborative program between government officials and various stakeholder groups from various walks of Dominican society.

CSOs involved in transparency initiatives were invited to participate in the early stages of the IPAC process, and they received assurances from the executive regarding their meaningful participation and transparency of the process. This mitigated the risk of executive capture of the process. During the reform identification and formulation stage some of the "Mesas" (Working Groups) experienced a more dynamic CSOs engagement than others.

Notable examples included the following topics (Mesas): health (with the participation of an advocacy CSO specialized in health access), access to information (with the Dominican Republic Chapter of Transparency International, which promoted the initiative to adopt an implementing and regulatory body ("organo rector" for the access to information law), procurement, education (even though the proposals were modest, but then expanded later on by a similar initiative—the Dominican Initiative for a Quality Education (IDEC in Spanish) with broad based participation of CSOs), as well as financial management (the open budget/"consulta amigable" initiative, with the Centro Juan Montalvo, a Jesuits grassroots organization, taking the lead in advocating for friendlier access to state budget information), transparency in the electricity service provision (with the private sector association Industriales de Herrera monitoring the electricity portal).

In subsequent (downstream) stages, CSO input grew further, and concentrated in social monitoring and oversight of the whole reform initiative. In fact, in mid-2010, months before the agreement regarding the social monitoring program in IPAC, the government set up ten working groups to identify the reform measures in various priority areas. CSOs were already involved in these working groups. These working groups (or "tables"/"mesas") were assigned to the following topics: water, energy, health, education, infrastructure, civil service, financial management, procurement and acquisition, access to information, and supreme audit institutions (SAIs).

In these working groups, representatives from the government, with the facilitation of donors' technical assistants, detailed 30 concrete steps that were needed to reform each area and for subsequently monitoring the reforms. The 30 recommendations were intended to be implemented in the short term (most of them within one year, though some others indicated the need for a longer timeline for their implementation) with government funding and some support from the donor community.

Following six weeks of preparatory work in 2010 (June 8–July 26), a set of thirty recommendations of the ten *Mesas* were first published online and then presented to the Government at a public event in the fall (October 20th). The recommendations were approved by the Councils of Ministers during a day-long Cabinet meeting. Then a Government focal point was appointed to ensure the implementation and monitoring of each recommendation. Subsequently, concrete work started on these areas.

But notably an Observatorio Ciudadano de Implementacion (OCI-IPAC, a Citizen Observatory for Implementation) was created with support from donors following the preparatory work. OCI-IPAC is a coalition of 14 CSOs, coordinated by Participacion Ciudadana (PC), a prominent transparency and anticorruption CSO in the Dominican Republic. The government acknowledged the OCI and gave it "space" to provide independent monitoring, which the OCI did successfully during the regular accountability workshops.

Since early 2011 the OCI played a key role in the IPAC process. It independently monitored progress in the IPAC recommendations and reported publicly on its assessment of the program's progress. Representatives from the OCI and the various CSOs also contributed to each working group. While the focus has been on the role of CSOs (and thus the OCI) in the description above it is very important to emphasize those other key agencies and institutions that also played central roles in the IPAC origins and the process. Notable actors include the inter-agency coordination group for IPAC (a technical level group of donors specialists), the IPAC steering committee (composed of two government representatives, 2 CSOs representative, and 2 international organizations), and the continuous work of the numerous working groups (Mesas) throughout the process. These groups have formed various broad based coalitions of actors that worked throughout the process in different phases and on a voluntary basis.

During 2011 the IPAC's monitoring process featured a number of quarterly public events (in March, June, and October) to report and to discuss the progress of the program's implementation. Participation to these events has been stable, attracting each time more than 300 people from government, private sector, civil society and the international community. In February 2012, an even larger segment of the public and many stakeholders took part in the IPAC's closing conference. The event was led by the government, yet all other stakeholders, including the OCI and donors attended and had an active role in the presentation of the assessment and results of the initiative.

Following the closing conference, smaller meetings between key members of the government, civil society, and donors took place in February 2012. The meetings continued to take stock of IPAC's current progress and participants shared their perspectives and made suggestions for future steps, indicating some concern that the anticorruption initiative may either come to a halt, or, conversely, become formalized by the public sector via a law. A year after the closing conference, and with a new government in place, the IPAC recommendations continue to be used as roadmap by many line ministries, have been included in a Transparency Protocol signed between the President and Civil Society, and have been the basis for the entry of the Government in the Open Government Partnership (OGP). The IPAC methodology is now replicated in the Dominican Republic for two other participatory pro-reform coalitions' initiatives, namely the Dominican Initiative for a Quality Education and the Caribbean Growth Forum Dominican Republic Chapter.

3. ON SOME IPAC STRENGTHS AND ACHIEVEMENTS

Strengthening of Civil Society in the Areas of Monitoring, Transparency and Anti-Corruption

The background above makes it especially noteworthy that the government was prepared to collaborate with civil society and private sector, and embrace the notion that their own initiatives on transparency and anticorruption would be subject to social monitoring by civil society under the OCI-IPAC. The OCI-IPAC was given a prominent role in oversight of the reforms, while the government voluntarily made itself accountable to OCI-IPAC for progress monitoring.

While the executive may have agreed to submit itself to OCI-IPAC oversight for politically expedient purposes, the salutary effect of such CSO participation and role ought not to be underestimated. And it ought to be noted that powerful CSOs such as PC are not seen as unconditional supporters of the government with respect to transparency and anticorruption; in fact PC has not been timid in criticizing the government on corruption matters, as illustrated by PC leaders criticizing corruption in the public sector over the years.

Broadly speaking, the social monitoring that took place through CSO had considerable impact. Among other results, it is noteworthy in that it applied civil society pressure to move forward with reforms that faced internal resistance in some quarters of the executive.

In fact, an important result of IPAC is in the institutional strengthening of CSOs. The setup of a multi-CSO coalition, in the form of the OCI-IPAC, provided a concrete framework for coordination across organizations and reform sectors. And it provided an opportunity for unprecedented collaboration and substantive cross-fertilization among a varied group of NGOs, advocates, and experts. The inclusion of the private sector also enabled collaboration between civil society and private sector groups, which is not the norm.

Taken seriously and approached in a technocratic manner, the implementation of the detailed OCI-IPAC framework enabled important CSOs to share their initial experience in the design and implementation of monitoring techniques; for example many CSOs had expertise in "control social" (social oversight) and monitoring of public institutions. CSOs provided substantial training and continuous feedback, supported by donors such as USAID and the World Bank, to less capable CSOs.

In terms of institutional strengthening, the empowerment of civil society through the OCI-IPAC process was at least as important as the concrete public sector actions and reforms themselves. CSOs were given a mandate and responsibility not customarily given to them. And the other key stakeholders, notably the executive as well as some of the general public, saw CSOs in a positive light and growing prominence.

Trust as Social Capital: Increasing Mutual Understanding between Government and Civil Society (as well as the Private Sector)

The close collaboration between civil society and the government produced important institution-building results for both sides, and for the IPAC itself. While maintaining their distinct roles, the traditional suspicion and lack of understanding between both sides gradually declined as both sides worked together during this process.

Members of OCI-IPAC increasingly saw the value and dedication of key members of the executive branch and vice-versa. The focal points from the executive increasingly appreciated the commitment and input from CSOs. In fact, over time the governmental focal points represented in the IPAC working groups exhibited higher levels of trust and receptivity about the overall work, feedback, and oversight by OCI-IPAC. And more generally, they respected the participatory approach of the work by the Mesas (which played a major role in helping build such a trust).

And both sides appear to actually have learned from each other, with many of the represented CSO institutions as well as ministries having experts working alongside in IPAC. Further, the private sector also participated in this process, notably in some of the working groups, through the CSO observatory (via the Association of Industriales of Herrera), as well as in the IPAC's Steering Committee (via the Consejo Nacional de Empresas Privadas and the Santiago Chamber of Commerce).

The result of this collaboration was that CSOs were prepared to plainly report on some achievements by the government. And the government was prepared to also acknowledge that in some important areas, insufficient progress had been attained, as pointed out by OCI-IPAC.

Some Institutional Strengthening in the Executive

The importance of IPAC on the broader institutional structure should not be exaggerated. IPAC did not intend to address all of the Dominican Republic's corruption problems. However, many important dimensions were included, measures were undertaken, and some capacity enhancements took place. Further discussion is provided below, but for instance the role of the Ministry of Public Administration was enhanced due to the responsibility it had in the IPAC and the implementation of civil service reforms, similarly on the executive side of IPAC. Some ministries—such as Economy and Planning, and to an extent, the Presidency—derived specific know-how and multi-stakeholder participatory benefits from the coordinating role they had. The role of the water executive agency INAPA was also noteworthy.

More broadly, some segments of the executive branch exhibit a fresh receptivity to the notion of external accountability. This is particularly true in those ministries and agencies that had a prominent role in IPAC and were active during its implementation process. Furthermore, the members of the executive found their collaboration with members of civil society rewarding. Civil society provided executive branch members with contacts outside of their traditional day-to-day governmental staff. And reciprocally that led to an enhanced acknowledgement and recognition by external actors of the value of their public sector work.

Finally, when there are reform champions—as they typically exist in many governments and were apparent in various ministries in the Dominican Republic—they can benefit from a broad coalition spearheading change, particularly since they can rarely be successful in promoting such reforms individually.

More Transparency and Accountability by the Executive Seen by Segments of the Public

A key component of IPAC was a system of detailed monitoring forums and progress reports, which took place throughout the IPAC's duration. These reports were intended to disseminate IPAC's findings to the broad group that participated throughout the process which included the international community, government, private sector, the media, and CSOs.

Through "government-driven" media dissemination efforts a segment of the public became aware of the IPAC initiative. Generally, prominent media outlets, including broadcast media, frequently discussed the IPAC. And at times the disseminated information was rather detailed, including the extent of progress in each one of the ten topics (Mesas) of the measures being implemented.

However, it may have been the case that the outreach effort had more impact on the urban elite in Santo Domingo than other segments of society, since the central government and the capital were to an extent the focus of the initiative. Further, the reports were often technocratic in nature, which may have limited the accessibility of the reports.

However, other Dominican Republic regions and segments of the population were not neglected, and some of the dissemination and debate was publically accessible. A popular radio program hosted the IPAC on a weekly basis. Further, dissemination about IPAC also took place at the provincial level, led by the National Commission on Ethic and Fight against corruption, and in fact the access to information national campaign was branded as an IPAC initiative.

Naturally, different interpretations of the IPAC reports appeared in the media. Some reports focused on the achievements of IPAC while others emphasized the number of measures that had not been implemented (the "glass half full vs. half empty" conundrum), depending on the particular political leaning or interpretation of the journalist or media outlet. But the rigorous progress monitoring approach was institutionalized to a large extent, and increasingly understood, even if it required some modicum of handholding by some donors.

Eventually the public became increasingly aware of the IPAC and a segment of the public began to follow the dissemination of the progress reports. They did so irrespective of their views of whether concrete progress on anticorruption in the Dominican Republic had been attained or not (since their opinions vary). By the end of the process many in the public appeared to be of the view that IPAC illustrated that the government can be made more transparent and accountable.

Methodological Strengths of IPAC

The IPAC monitoring methodology was based on instituting transparency by including the publication of each document and minutes of meetings. And IPAC also constrained the individual ability to unilaterally alter the progress monitoring targets or their evaluation. The enhanced effectiveness of the program provided an enabling environment for increasing and credible civil society, private sector and government participation.

The quarterly accountability workshops, coupled with the simple "traffic light" coloring approach to indicate extent of progress in each agreed action created a set of positive incentives for concrete contributions by CSOs as well as for promoting concrete actions and progress in the executive. The traffic light balanced

scorecard summary was distributed the day of the public accountability workshop (see appendix B for the final summary sheet reporting over one year of implementation).

Reforms and Results Can Take Place in the Short-Term-Even If Partial

From the outset, the participants understood that the IPAC would be a short term program that was not supposed to last much longer than a year. Further, the IPAC did not aim to create bold or broad-based reforms, since generally they were either not considered politically realistic or they were deemed as difficult to implement in a short time span. Thus the agenda of reforms was designed to make stepwise progress forward in some areas.

Within the scope of more moderate ambition, IPAC is noteworthy since many measures were implemented and produced results, even if some were not major or far from complete. According to the final monitoring report of IPAC, sanctioned by the executive, which used a strictly (measure-by-measure) "bean-counting" perspective, about two-thirds of the steps and measures that were subject to IPAC monitoring were implemented (World Bank 2012).

While many of these measures were small intermediate administrative steps towards implementation of an eventual reform, they ought not to be belittled. Some were considered *a priori* to be prerequisites for implementing longer-term reforms. Since generally reforms go unimplemented due to insufficient attention and effort on the prerequisite steps, the value of such IPAC focus on prerequisites ought to be noted. It has worked both as a catalyst and as an accelerator of reforms.

Furthermore, IPAC did not exclusively implement marginal steps. In some cases, more substantive reforms took place, such as reforms in the civil service, submitting a project to create and institutionalize a specialized transparency/ access to information agency, and the online publication of the central budget revenues and expenses in an accessible format.

The donor community also benefitted from the experience. The IPAC gave significant exposure to some donors. And importantly, the IPAC made donors coalesce around one very concrete program, and may have become the single example of a donor coordination mechanism that actually worked in the Dominican Republic. The "Mesas"-Driven thematic working groups collaborated with donors. In fact, many concrete recommendations from the thematic groups ended up being funded by a donor. The donor community also derived concrete benefits from the experience: the coalition-building exercise among donors, and, more conventionally, the enhanced coordination was noteworthy.

In terms of accomplishments, IPAC achieved some noteworthy results, particularly considering its limited time frame and the resources. Specifically, there were some substantial achievements in terms of a novel participatory approach to collaboration and oversight in government reforms. These achievements include institution- and trust-building reforms in some areas. These achievements contributed to improved governance, transparency and anticorruption.

For example, the "Public Health" working group was instrumental to accelerating a reform of the unified procurement system for drugs and medical equipment that has been stalling for years: as a result, the new procurement system has led to a reduction of 65% of the cost of medicines and medical supplies, which implied a net saving for the State of US\$25 million during 2013.⁴

Similarly, recommendations of the working group on "Public Works" have eventually started to materialize with the new administration since August 2012, with the Comptroller General's Office, the Department of Public Procurement and the Directorate General for Ethics and Integrity (DIGEIG) developing a system for monitoring of public works contracts. This system operates in a portal through which the Comptroller and other institutions assigned may find the level of execution of the public work and their budgetary allocation.

Other important progresses are recorded in the implementation of the Single Treasury Account (STA): this reform has led to the closing of more than 3000 accounts in the central government during February 2012 and October 2013, and the piloting of the STA in all central government entities. In the area of Public Finance Management, in early 2012 the government conducted an assessment using the OECD-DAC Procurement Methodology. A Decree (543-12) was passed on September 2012 to modify the implementing regulations of the Procurement Law 340-06 and address some of its shortcomings. Further, the government is fully engaged in the development of the transactional procurement portal, for which it has assigned funding in the National Budget of 2014.

Through the IPAC, a Supervisory Body for the application of the Access to Information Law has been created within a new Directorate General for Ethics and Integrity, which has also the authority to start investigation over the infringement of the Access to Information Law. In addition to this, the Directorate General for Ethics and Integrity issued a Resolution (1/2013) for the application of a standard procedure for the publication of Transparency portals in each of the government institutions.

From the "Education" Working Group a new and very powerful coalition (the Iniciativa Dominicana para una Educación de Calidad, IDEC in Spanish, a Dominican Initiative for Quality Education in English) has been launched to tackle the root causes of poor service delivery in education and already delivered tangible results through a transparent – IPAC-style – monitoring process. The initiative started in March 2013, with the first accountability workshop in September 2013 showing that of the 200 priorities about 55% are on track, including the formulation of the new curriculum for primary and secondary education with strong focus on competencies, the strengthening and budgeting of the Institute for Students' Welfare, and the literacy plan for more than 200 thousand people.

The Electricity Corporation has published the data on the internet on service provisions by individual circuits, enabling users with an internet connection to check the schedules for service disruption due to network maintenance.

The citizens can now access the Central Government Budget online, in a friendly format and including revenues, following the implementation of the recommendations of the "Public Finance Management" working group. This has significantly empowered civil society in analyzing the budget and strengthens CSOs advocacy campaigns (such as the 4% of gross domestic product [GDP] for education campaign).

The Ministry of Public Administration has leveraged the implementation of the IPAC reforms of the working group on "Civil Service" (introducing for example the standardized assessment framework for public servants' recruitments) to attract more donors' funds and expand the Ministry's work into the reform of Health and Education management systems. In essence, some of the reforms were gradual, other more structural, and other had spillovers in other sectors.

Coupled with a frank discussion of the weaker areas of IPAC, and drawing the lessons from these as well, IPAC's achievements, more generally, can serve as a good example for other areas of work and countries of a project promoting improved governance.

4. CHALLENGES AND ISSUES ON IPAC

In the previous section we emphasized some noteworthy achievements the IPAC initiative. At the same time, as in any novel initiative, there were challenges and unfulfilled results. Some of these are discussed here, with a view to constructively learn from them for future such initiatives in general, and for suggesting possible next steps on participatory approaches to anticorruption in the Dominican Republic in particular.

Politics, Government and Civil Society: Political Will Vs. Vested Interests

To an extent, IPAC was seen as being closely associated with the President Fernandez himself. Thus it was viewed by some critics as a PR exercise, responding to the poor image of the Dominican Republic in terms of corruption. While naturally there are critics and partisans in any politically sensitive initiative on anti-corruption, further reflection is still warranted about the wisdom of aligning such an initiative too closely with any President. This is particularly true if insufficient efforts were made to embrace and incorporate the various political actors in the initiative.

However, the other protagonists in IPAC were not universally associated with the President. The Ministry of the Presidency as well as the Ministry of Economy, Development and Planning were engaged continuously in this process. They provided notable expertise and commitment among some staff and officials. Yet there were also constraints to capacity that were compounded by the complex coordinating task among so many diverse stakeholders. And an increasingly prominent role of CSOs in the form of the OCI-IPAC made the lead roles in IPAC more dispersed, and less monopolized in the hands of the executive.

When it comes to the process of implementing serious anticorruption reforms anywhere, politics and the government intersect in the much used (and abused) notion of *political will*. The question arises regarding whether both IPAC's process and its results reflect the existence or absence of political will to implement a serious anticorruption program.

There is no definitive "yes or no" answer. For starters, it is difficult to have a full answer because IPAC cannot be regarded as the ultimate test of political will. This is because IPAC measures were not designed to cover *all* the important anti-corruption issues. Instead IPAC was focused on the short term and to an extent on incremental reforms (although not across the board, since some intended reforms were deeper, such as aiming at an STA). Some may argue that from the start this reflected a less-than-full commitment for bold reforms.

Nonetheless considerable progress was made. And that progress should be seen as evidence for the dedication of very capable civil servants and experts as well as the dogged oversight by civil society and to an extent the private sector; it should also be seen as a reflection of some measure of political will, since many of the actions required support and decisions at higher political levels of the executive.

In fact it would be a mistake to generalize regarding the extent of political will with respect to the execution of IPAC actions, since naturally there is large variation across politicians and ministries. For instance, there was notable support by high level officials from the Ministry of the Economy and Planning and the Ministry

of the Presidency. But there was less support from the Department for the Prevention of Administrative Corruption and the Ministry of Public Works (which would have been important, given the serious challenges of corruption and mismanagement in procurement). Unfortunately there appears to have been no sanction for high government officials who chose not to cooperate in this initiative, even though their ministries had been provided with clear responsibility.

The caliber of the executive focal points can also be a sign of political will; or in the case of a low-caliber (or junior) focal point, the absence of political will. Again, it is noteworthy that most focal points were of high quality. Although, in a few cases the quality of representation was lower—for example in the Health sector. Some ministries and agencies excelled in their commitments while others were on the other extreme of the spectrum. As discussed above, there was a real contrast between the positive effect of some agencies—such as the ministries of Finance, the Economy and Planning, and Public Administration—and the negative examples of other agencies—such as the Department for the Prevention of Administrative Corruption and the Ministry of Public Works.

The lack of commitment by some focal points makes it impossible to rule out vested anti-reform interests in some key high-level officials. This possibility warrants investigating vested interests at earlier stages of this type of program. And while the program is progressing, communicating with the office of the Presidency and other key leaders in the program would be valuable when ministries refuse to cooperate.

Furthermore, understanding the various interests driving different organizations and leaders regarding a program like IPAC should not be limited to public sector agencies. The incentives and interests across civil society and private sector organizations are also highly varied and complex. For instance, many CSOs depend heavily on government funds and also carry out government-sponsored projects. Other CSOs have gained a high degree of independence and autonomy and were key in establishing the OCI-IPAC.

Some IPAC Design and Execution Challenges

While noteworthy achievements were emphasized in the previous section, some drawbacks and lessons for future programs emerge as well. We note a number of them in turn:

In Designing the Program, was there Sufficient Prioritization and A Priori Efforts in Carrying Out Impact Assessment?

The themes (tables) and specific measures that were proposed did not undergo a rigorous strategic prioritization (or expected impact) analysis. In the early planning meetings more emphasis should have been placed on the eventual impact each proposed measure was supposed to have on transparency and anticorruption. In particular, the impact analysis should have considered the mixture of policies. Then the impact analysis of the proposed measures should have been compared against a few other plausible scenarios that included a different mix of reforms.

But in reviewing the plethora of measures that were part of IPAC, it seems that some of the original measures were highly relevant in terms of eventual impact on anticorruption (if fully implemented), while others much less so. Variation often occurred within the same "Mesa" and also across different tables. The different measures appear to have had highly varying degrees of importance (and ambition).

Furthermore, the strategy, monitoring, and final assessment report of IPAC should have classified which programs were *administrative intermediate steps*, vs. those that were to be *final reform outcomes* (such as having the budget online and in an open format; the STA; a Freedom of Information agency, etc.).

The progress on the intermediate steps could still have been given prominence during the earlier process stages of IPAC, but more focus should have been placed on the reform outcomes in the final assessment. A stronger focus on sequencing would have enhanced the process.

What is important to learn from this is that while sequencing of reforms and their intensity are important to be outlined from the outset—also to manage the expectations of the coalitions engaged in the process – the diagnostic of the problems is already clear from the outset to all stakeholders, which implies that prioritization would not be far from optimal.

Could the Different Relevance of the Various Measures Proposed Have Been Given Different Weights in Monitoring Progress—and Particularly in the Final Assessment of IPAC?

Some actions are required as part of an overall reform package even if they don't have an enormous impact on their own because they are pre-requisite to other reforms. These reforms can justifiably be included in the program. Yet in the final impact analysis they should not warrant the same weight as a major reform, as was the case in evaluating the final outcomes of IPAC.

Instead of dynamically weighting reforms according to their importance, the evaluation of IPAC essentially "bean-counted" every single measure originally identified and weighted the reforms equally irrespective of its reform impact or relevance. Consequently, the final report did not provide an accurate indication whether meaningful reforms took place or not. A two-tier classification of measures may have helped address this problem. Alternatively (or in addition), different weights could have been given to different measures.

Partial Measures May Be Counted, but Don't Always Matter

Similarly, it is important to recognize that that not all measures are equal. A mechanistic count of progress may be somewhat misleading, although its transparency and simplicity ought not to be under-estimated. Take the important case of the STA, which is an important objective in the Dominican Republic. Reducing the multitude of disparate treasury accounts from, say, 6,000–2,800 (and taking six months to do so), is far from signaling that half of the actual reform is done. From a reform impact standpoint, much more credit for meaningful results is only due when the number of accounts actually approaches one. Still, without the IPAC this reform would have not been so prominent in the government agenda, and indeed it features among one of the top priorities of the current administration and one for which the CSOs are strongly advocating for.

The Tight Timeline

While the realities on the ground (including timing of elections in May 2012) necessitated an extremely tight timeline, the drawbacks of having such short time frame ought to be emphasized. The actual IPAC implementation and oversight timeline was about 10 months, which is extremely short for institutional change. In a number of cases the work on an area had to start from scratch. So the tight timeline precluded full-fledged success during the short IPAC life span even though there was strong commitment. Water sector reforms are a good example of the time frame being constraining.

Further, the IPAC should have continued for a few more months; alternatively, the IPAC should have been explicitly defined as a first stage of a broader and longer term effort. At the very least, if the IPAC could have

spelled out the reforms required for a serious medium-term effort on anticorruption, even if the political "buy-in" had to be deferred to a later stage.

However, under some circumstances a tight timeline can have positive effects because it forces more ambitious reforms than would otherwise occur. And while in some cases it would have been helpful to have more time, the tight deadline was not the reason for lack of progress in a number of other areas. For instance, the very partial progress regarding an STA was in part due to the insistence that it be implemented according to a rather gradual approach, even though it was possible to take a much quicker route.

Incorporating Institutional Capacity Constraints Early on into Program Design

In hindsight, there was insufficient focus in addressing the institutional capacity constraints in some key institutions that were given a crucial mandate at the outset of IPAC. This applies to an extent to the Ministry of the Presidency. The ministry was constrained by a small staff and thus limited the concrete day-to-day management and involvement in the initiative despite the efforts of management.

Likewise, the necessity that CSOs fulfill a demanding and technocratic oversight role in specialized reform areas also tested the capacity of some CSOs. Some but not all rose to the occasion. While some technical assistance and training was provided, further capacity enhancement and training efforts particularly in some specialized areas would have helped, particularly in the methodologies of evidence-based monitoring.

Rule of Law: Ignoring the Impunity Challenge

If government officials have impunity, the overall effectiveness of the reform package suffers considerably since there cannot be any enforcement. Also the population will not view the government efforts on an anticorruption program (which may be focused on some other areas, macro, sectoral, technical) as credible.

If skepticism prevails among citizens and firms, then their view of an initiative like IPAC is dimmer than otherwise but there is no meaningful change in the behavior of those firms and individuals engaging in bribery or tax evasion. Nor is there any change among honest individuals and firms that ponder whether it is worth reporting corruption.

As in many countries around the world, there is virtual impunity for high level political corruption in the Dominican Republic. As long as that is not addressed, corruption deterrence on high level corruption is impaired even if other reforms related to corruption and transparency takes place.

Transparency reforms and disclosing corruption cases can impose through reputational and political costs. But de facto impunity blunts the effectiveness of transparency when there is no further sanction. Further, the perception by the citizenry regarding impunity is crucial for the credibility of any anti-corruption program where the public sector is a major driver.

In essence, transparency with impunity—or disclosure without sanction—provides for an unsatisfactory mix and disappointing anti-corruption results follow; the prevailing cynicism is perpetuated and the credibility of an anti-corruption program is negatively affected. This challenge of impunity appears to be one of the most salient ones in the context of the Dominican Republic's IPAC, which did not include rule of law/judiciary reforms as part of the program. Thus no special *Mesa* was set up to address these.

The IPAC did not consider judicial reform because it fell outside of the scope of the executive. Therefore, the executive branch supposedly could not be held accountable for reform. The official reasoning behind excluding rule of law reforms was clear—even if it not particularly compelling.

Even if such rationale is taken at face value, the executive had several reform options. The executive could impose administrative sanctions, related to budgetary diversion of funds or misappropriation in procurement. Institutionally, SAIs, such as the Office of the Comptroller, are part of the executive branch and can play an important role sanctioning corruption.

Unfortunately the SAIs are notably weak in the Dominican Republic due to a plague of serious leadership problems, vested interest and lack of resources. In fact, even though there was working group under the IPAC fully dedicated to this theme, this group accomplished the least; there was little commitment or input from those institutions.

Thus, during the IPAC program, there was an absence of concrete and relevant measures and reforms in this area in general, and lack of progress in the much needed institutional strengthening in the SAIs and the *Contraloria* in particular.

Second, there should have been a more concerted effort to also include the key Rule of Law institutions that are part of the judiciary branch. That approach would be consistent with the laudable effort by IPAC (and the authorities of the executive) to embrace participation by civil society.

The collective action of IPAC could have been further strengthened by a mutual understanding that each stakeholder—whether civil society, private sector and media (present in IPAC), the legislature/parliament (minimally involved) and the judiciary (absent) —had their own duties and responsibilities in the reform effort.

Within the participatory and mutual accountability framework it should have been clear to each stakeholder, and to the public more generally, that the executive could not be held responsible for every single action. Furthermore, such a mutual accountability framework, coupled with public dissemination of results, may have encouraged healthy competitive reform efforts by the various branches.

Lastly, even if political and institutional considerations precluded incorporating the design and implementation of reforms in the judiciary and legislative branches, nothing would have precluded setting up parallel task forces, outside of IPAC (with some loose coordination), could have worked towards reforms in those branches. Unless, of course, if political will to do so was absent.

Either way, the absence of reforms in the areas critical to address the problem of impunity in the Dominican Republic, whether as part of IPAC, or even in a parallel track, not only meant a missed opportunity in terms of a multiplier effect to transparency-related reforms, but may also have hampered the credibility of IPAC in the eyes of the population.

Misgovernance and the Extremely Low Tax Revenue Mobilization in the Dominican Republic

Hovering at around 13% of GDP, the Dominican Republic tax revenue mobilization is among the lowest of any stable country around the world, not to speak in the Western Hemisphere. The average in Latin America is about 21% of GDP. And few if any inroads have been made in this respect over the past decade in the Dominican Republic.

With such subpar tax revenue intake, the effectiveness of the public sector is seriously hampered, particularly governance and service delivery. Furthermore, such low tax mobilization reflects deep-seated governance (and even corruption) challenges, which go on unaddressed as little if any reform effort is put on this issue. Abysmally low tax revenue is a major governance and corruption challenge. The absence of reforms in this critical area reflects both powerful vested interests from the corporate sector who benefit enormously from the misgoverned status quo and also the absence of political will from the political class and the government. And related to this, at a more fundamental level, low revenue mobilization from domestic taxes is related to weak tax compliance, tax evasion and elusion.

It is rather telling that this critical issue was not one of the reform areas discussed in the IPAC. It is telling that one reason mentioned for insufficient progress on some aspects of IPAC was insufficient government resources. In fact in those working groups that did achieve progress, independent funding made the difference. Clearly, for concrete progress on governance reform and development results in the Dominican Republic in the near future, a revamped tax collection effort ought to be a priority.

This section focused on the twin challenges of impunity and low tax revenue, but there may not be other important areas that deserve focus. Drug trade and money laundering are challenges briefly mentioned already, that require further attention. Further attention on local government reforms and devolution is also warranted.

CONCLUDING AND SOME CONCRETE RECOMMENDATIONS

In this paper we have tried to assess the IPAC and place it in a broader context, with the objective to generate further discussion on the merits and challenges of concrete pro-reforms coalitions in the Dominican Republic. This effort should not be construed as a comprehensive evaluation of IPAC, for which more resources would be needed, as well as time to allow the IPAC's reforms to fully develop.

Given the background of corruption in the Dominican Republic on one hand and the positive trend in the extent of voice and democratic accountability, on the other, the IPAC was a noteworthy innovation to emphasize civil society and private sector participation in this anticorruption initiative.

Evaluations of prior experiences in other countries indicate that participatory approaches to anticorruption hold more promise than traditional and technocratic public sector approaches that are very top-down and exclusively supply-side driven. Given the particulars of corruption, civil liberties, and CSOs in the Dominican Republic, the case for a participatory approach was even more compelling.

Further, civil society generally had become increasingly weary and skeptical of reforms. It is noteworthy that the program recognized this fatigue and compensated for it. A primary objective was to energize and empower CSOs.

Some of the IPAC's objectives appear to have been attained and the enhanced ability of CSOs to work collectively may be the most important achievement. It proved that the whole community can be significantly more than the sum of its parts. "Collective action" gains were apparent among CSOs and also among donor agencies. IPAC became a good example of very concrete collaboration among many donors because IPAC created collaboration between the executive, civil society, and donors in the initiative.

As is the case in these types of innovative, multi-disciplinary initiatives, in politically sensitive areas related to governance and corruption, successes co-exist with challenges and disappointments. These initiatives achieved some noteworthy results, but pending challenges remain.

On balance, IPAC was a worthy initiative. All stakeholders took significant risks and some notable results have emerged already—while further impact can be expected if concrete follow-up takes place. With this perspective in mind, we conclude by offering five particular areas with specific suggestions for further discussion regarding possible specific follow-up initiatives.

1. Key reform areas for follow-up. In light of the above twin challenges of impunity and taxation as well as the absence of work on the drug trade, money laundering, local government, and decentralization reform in IPAC, it is important to focus on implications regarding the road ahead. In particular, a sequel to the IPAC should consider incorporating the judiciary and legislative branches of government into that work, as well as all critical for matters of tax reform.

If an integrated anticorruption program does not occur, a second best would be a parallel track similar to the IPAC process. Simultaneous reforms can create momentum, traction, and monitor

reforms in adjacent areas even if the reforms efforts are distinct. The unfulfilled reforms offer an opportunity for new reform efforts. Namely, procurement reforms, the STA (Cuenta Unica), and the urgent need to revamp and strengthen the SAIs require a new reform effort.

Furthermore, an opportunistic approach would be to continue reforms which have already started, in areas in which donor agencies have ongoing programs of support for reforms (such as the water sector, which featured an IPAC "Mesa" that exhibited significant progress).

It is also important to avoid mistakes in the next stage. One risk is a possible inclination by some in the administration to try and "regulate" the participatory involvement of civil society. Participation should not be mandated by fiat; instead any rule-making ought to ensure freedom of association and engagement by civil society. Similarly, the executive should be prevented from using CSO involvement in reforms from being a political tool.

- 2. A National Forum. Credible CSOs, supported by the donor community, could plan a high level national forum on anticorruption, featuring key members of the new administration, as well as the opposition, the legislative, judiciary and the private sector.
- 3. Leveraging the Power of Data and Disclosure: construction and periodic publication of new indices related to governance challenges in the Dominican Republic. CSOs should survey the population regarding the quality of public services. Then the CSOs should encourage evidence-based competition among agencies frequently publishing the surveys and "report card" type reports.
 - Second, at least one CSO should construct and regularly publicize an "impunity index." The index should highlight the serious deficiencies in many of the Rule of Law institutions. Third, CSOs and the think tank/academic community should focus on abysmally low tax collection. Simple indicators (not only overall taxes in GDP) on the actual taxes paid by large corporations and the wealthier segment of the population should be regularly published.
- 4. International Community and the OGP. International donors—or a successor to IPAC—could support above efforts, as well as provide technical support to CSOs. The international community could also assist the Dominican Republic in it making progress towards successfully implementing the international OGP launched in late 2011. In fact, the OGP could be a framework for a successor to IPAC.
- 5. Scaling up and Broadening Participatory initiatives in the Dominican Republic and beyond. The many positive results of the IPAC's rigorous, participatory and multi-stakeholder approach provide lessons that could be applicable in the future, both in the Dominican Republic as well as for many other countries (and the donor community). The benefits of institutionalized CSO involvement in governance initiatives are often under-appreciated, and many governments and ministries are initially wary. Thus, at times activism by leaders in civil society and by the donor community may be needed to disseminate and explain the potential benefits of these valuable initiatives, and to create an initial impetus for these programs. This could be valuable in successors to good governance IPAC-like programs in the Dominican Republic, as well as participatory reform programs in other areas of reform in the country. But the lessons from IPAC can also be instructive to the official international aid community, which had generally lost some focus in recent times in terms of supporting in-depth, in-country, participatory governance and anti-corruption programs. Similar evaluations of other

ongoing coalitions for reforms, such as the IDEC and the Caribbean Growth Forum, should be considered to compare results and take stock of lessons learned.

APPENDIX A: Participatory Governance & Anticorruption Programs (selective)

Country, Program name and type, Sponsor, Period	CSO involvement	Program Details	Evaluation	Source
Georgia, Albania, and Latvia: Participatory Governance & Anti- Corruption (GAC) Diagnostics & Action Programs; World Bank & USAID, 1998-2000	Think tank & private firms implement diagnostics, with input from civil society, experts, gov't. CSOs participate in reform plans.	Participatory approach to implementation of GAC diagnostic surveys, followed by participatory working groups on GAC topics using diagnostic results for action program formulation. National public forum with multistakeholder participation to discuss and launch reform program.	Informal: concrete initiatives and reforms took place in these 3 'early' GAC participatory countries in some institutions that were identified as governance and corruption challenged. Participatory approach was very novel in these countries.	Anticorruption in Transition reports (World Bank, various years), other documents
Bosnia, Kyryz Rep., Kazakhstan, Romania, Slovak Rep.: Governance & Anti- Corruption (GAC) Diagnostics & Action Programs; World Bank & (mostly) USAID, 2000-2003	Think tank & private firms implement diagnostics, some input from civil society, experts, gov't, who prepare action plans.	Participatory approach to implementation of GAC diagnostic surveys, & participatory working groups on program formulation. National public forum with multistakeholder participation to discuss and launch reform program.	Informal: some concrete initiatives and reforms took place; varying levels of participatory approaches with civil society, which was novel in these countries. Extent of participation varies.	Anticorruption in Transition reports (World Bank, various years), other documents
Tanzania; National Integrity Workshops; World Bank/Government; National level program; 1997-2003	Design, Implementation, Oversight, Collaboration	3 workshops held; 1st created action plan for national anti-corruption program. The others evaluated the gov't follow through on action plan. Media publicized the results.	Leeuw, van Gils, and Kreft: National Integrity Workshops were major anticorruption inventions because they facilitated "buy-in" by all parties.	Leeuw, Frans, Ger van Gils, and Cora Kreft. 1997. "Evaluating EDI's anti-corruption initiatives in Uganda and Tanzania." Working Paper, World Bank, Washington, DC.

Country, Program name and type, Sponsor, Period	CSO involvement	Program Details	Evaluation	Source
Uganda; National Integrity Workshops; World Bank/Government; National level program; 1997-2004	Design, Implementation, Oversight, Collaboration	1 st workshop created a national anti-corruption action plan. Followed by a public relations campaign and several oversight workshops.	1st two workshops were publicized; however, effectiveness of program decreased afterwards because public awareness of corruption was high prior to the workshops.	Leeuw, Frans, Ger van Gils, and Cora Kreft. 1997. "Evaluating EDI's anti-corruption initiatives in Uganda and Tanzania." Working Paper, World Bank, Washington, DC.
Benin; Technical Committee ; World Bank/Government; National; 1997-2000	Design, Implementation, Oversight, Collaboration	Technical Committee brought civil society and governmental officials together to design legislation to increase parliamentary control over the budget and to publicize tender procedures. It also designed a new anticorruption agency.	Technical Committee partially successful. Budget and legislation was passed. However, negotiations broke down over the anti- corruption agency. The gov't wanted control of agency; civil society wanted an independent director.	Haarhuis, Klein, and Carolien Maria. 2005. "Promoting Anti-Corruption Reforms: Evaluating the Implimentation of a World Bank Anti-Corruption Program in 7 African Countries (1999-2001)." University of Utrecht.
Kenya; Kenyan Anti- Corruption Authority; World Bank/Government; National; 1997-2000	Implementation, Oversight	The government created a new anti-corruption agency and invited civil society to help implement and monitor its anti-corruption plan.	Ultimately, program was unsuccessful. Some reforms were passed but anti- corruption agency struck down by the Supreme Court. Members of gov't may have pressured Court to stop the reforms.	Haarhuis, Klein, and Carolien Maria. 2005. "Promoting Anti-Corruption Reforms: Evaluating the Implimentation of a World Bank Anti-Corruption Program in 7 African Countries (1999-2001)." University of Utrecht.

Country, Program name and type, Sponsor, Period	CSO involvement	Program Details	Evaluation	Source
Ghana Anti-Corruption Coalition; Ghana Anti- Corruption Coalition; National; 2000-Present	Design, Implementation, Oversight, Collaboration	Coalition result of National Integrity Workshop. It designed and implemented a national anti-corruption plan. Coalition continued to provide a forum for civil society and the government, jointly sponsoring anti- corruption plans.	The Ghana A-C is an unprecedented anti-corruption coalition. Effective because it allows for joint "ownership" of the anti-corruption reform agenda. Awarded the WB's "Anti-corruption Collective Action Competition for Practitioners."	Johnston, Michael, and Sahr Kpundeh. 2002. "Building a Clean Machine: Anti-Corruption Coalitions and Sustainable Reform." The World Bank Institute, World Bank, Washington, DC.
Armenia; Anti- Corruption Participatory Monitoring; Anti- Corruption Participatory Monitoring; 2005-2007	Implementation, Oversight, Collaboration	A coalition of CSOs designed and conducted a survey into corruption in the public health care sector. The results were presented to the government and to the media in order to disseminate the results.	N/A	"Strengthening Awareness and Response in Exposure of Corruption in Armenia." Final Report. Findings of the Anti-Corruption Participatory Monitoring Conducted in Health and Education Sectors by Civil Society Anti-Corruption Groups.
Perú; Mesas de Concertación para la Lucha Contra la Pobreza (MCLCP); Government; National; 2001-Present	Collaboration	The MCLCP is a forum for the government and CSOs to collaborate in order to create national policies for a variety of sectors, including anticorruption policies.	N/A	Felicio, M. and Indu John-Abraham. 2004. "Peru: a System of Social Accountability." Series of the Civil Society Team for Latin American and the Carribbean, World Bank, Washington, DC.

Country, Program name and type, Sponsor, Period	CSO involvement	Program Details	Evaluation	Source
Benin, Bolivia, Brazil, Burundi, Colombia, Ecuador, Ghana, Guatemala, Guinea, Haiti, Honduras, Kenya, Madagascar, Malawi, Mozambique, Paraguay, Peru, Sierra Leone, Zambia; Country Diagnostic Surveys; National, World Bank/Local CSOs; 1997-2006	Design, Implementation, Oversight	The World Bank, local CSOs, government officials, and donors all collaborated to design and implement surveys of corruption in governmental services; the surveys were thematic and sectoral. Participatory approach to diagnosing and design of reforms.	N/A	World Bank Institute. 2012. "Governance Diagnostic Brief." World Bank, Washington, DC.
Georgia; Local Government Initiative; Partners for Democratic Change; Subnational; 2010	Design, Implementation	Local gov't officials and civil society formed coalition to investigate causes & manifestations of corruption in local gov't. Coalition ran series of workshops to discuss better structures for local gov't for anticorruption.	N/A	Partners for Democratic Change (http://www.fpdl.ro /services.php? do=anticorruption_ strategies)
Poland; Sokolka; Partners for Democratic Change; Subnational; 2010	Design, Implementation	CSOs & gov't officials conducted series of conferences & surveys, then designed strategy for reducing corruption and improving municipal service delivery. Program was implemented jointly.	N/A	Suwaj, Patrycja Joanna. 2011. "Sokolka Case Study: Strategies to Treat and Prevent Corruption through Increasing Local Government Integrity, Efficiency and Accountability." Prism Association.

Country, Program name and type, Sponsor, Period	CSO involvement	Program Details	Evaluation	Source
Romania; Craiova; Partners for Democratic Change; Subnational; 2008- 2010	Design, Implementation	The municipal government conducted a survey to identify those areas that were most in need of anticorruption programs. The municipal government then wrote a strategic anticorruption plan, which called for well targeted training programs. CSOs were then involved in the design and implementation of the training programs.	N/A	Vasilache, Ana, and Nicole Rata. "Craiova, Romania, Case Study: Strategies to Treat and Prevent Vulnerability to Corruption through Increasing Local Government Integrity, Efficiency and Accountability." Local Government Initiative of the Open Society Institute.
Slovakia; City of Martin; Transparency International; Subnational; 2008	Design, Implementation	TI and the City of Martin jointly audited numerous municipal programs, identified areas that had significant corruption, and then designed and implemented training programs to reduce corruption in those areas.	In 2011, the city of Martin received the UN Public Service Award in the category "Preventing and combating corruption"	Partners for Democratic Change (http://www.fpdl.ro /services.php? do=anticorruption_ strategies)

APPENDIX B: Status of the Implementation of IPAC Recommendations, February 7, 2012

WORKING GROUP 1 – ACQUISITION LAWS AND REGULATIONS	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.1 - Compliance with Law 340-06 on purchasing and procurement of goods, services, works and awarding.				
A.1.1 Official Document to the General Comptroller of the Dominican Republic.				
A.1.2 Official Document to the Ministry of Finance to transfer the administration and control of Dominican Procurement Portal to the Directorate General of Procurement	•	•	•	•
R.2 - Transform the Dominican procurement portal into a transactional portal				
A.2.1 Design, develop and management of a transactional portal by the Directorate General of Procurement				
A.2.2 Strengthen the organizational structure of the Directorate General of Procurement		•	•	•
A.2.3 Issue a decree approving the preliminary draft of the Procurement Single Regulation				
A.2.4 OECD/DAC self-assessment.				
WORKING GROUP2 – CIVIL SERVICE	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.4 - The Executive Branch issues an instruction to the Ministers to comply effectively with Civil Service Law 41-08.				
A.4.1 Promote the issuing of an instruction by the Executive Branch, instructing the ministers to comply with Civil Service Law 41-08.		•		•
A.4.2 Incorporate eligible officials to the administrative career. (Act. 41-08).				
A.4.3 Effective application of the Common Evaluation Framework				
A.4.4 Implementation of SASP at the Central Government.				
A.4.5 Dissemination and awareness raising of Act 41-08				
A.4.6 Create a one-stop shop to rationalize regulatory steps.				
R. 5 - The delegated institutions should deliver the Head of State the law proposal, which should be subject to a prior				
consensus by the Economic and Social Council, before being submitted to Congress.				

WORKING GROUP 3 – FINANCIAL MANAGEMENT	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.6 - A Implementation of the Single Treasury Account (TSA)				
A.6.1.1 Approval of the conceptual model of the STA				
A.6.1.2 Function specification of units in the TSA.				
A.6.1.3 Definition, elaboration and documentation of Regulations				
A.6.1.4 Unfolding and registry of all banking accounts.				
A.6.2 Develop a computer system.				
A.6.3 Start up the Single Treasury Account.				
R. 7 - Publish budget execution information of IFMS (Integrated Financial Management System) on internet				
A.7.1 Publication of the historical trend of the budget execution of the central governments				
A.7.2 Elaboration of the income analysis.				
A.7.3 Elaboration of the expenses analysis.				
A.7.4 Elaboration of an annual budget and monthly execution plan for every governmental entity.				
A.7.5 Implementation of a technical roadmap for a user-friendly consultation of the IFMS information.				
A.7.6 Preparation of easy-to-interpret budget reports and technological improvements in the IFMS.	•			
R.8 - Implementation of Decree No. 211-10 on the common evaluation methodology and the extension of the self-assessment critical areas of programmatic and government financial management.				
A.8.1 Implementation of the Common Evaluation Framework with the participation of the public administration and civil society	•		•	•
A.8.2 Preparation of a chart with the key processes of the financial areas	•			
A.8.3 Evaluation of t processes, recommendations and socialization of lessons learned	•	•	•	
R.9 - Research for improving decisions concerning financial administration and planning				
A.9.1 Performance evaluation of the existing coordination mechanisms.				
A.9.2 Identification of contact points (inputs and outputs)				
A.9.3 Design of coordination tools.				
A.9.4 Reports on the consensus building on the tools to be implemented			•	

WORKING GROUP 4 – ACCES TOINFORMATION	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.10 - Instruct officials to publish standardized information on the internet within 90 days				
A.10.1 Creation and authorization of a standardized format guide.				
A.10.2 Implementation (dissemination, training and counseling) of the standardized format guide throughout governmental institutions.	•	•	•	•
A.10.3 Information update on websites.				
A.10.4 Periodical auditing of compliance with guidelines.				
R.11 - Create the Office of Public Information Access.				
A.11.1 Review of the current proposal presented to the CNECC.				
A.11.2 Submission of the proposal to Congress.				
R.12 - implementation of various actions to increase the knowledge on access to public information among citizenship.				
A.12.1 Issue instructions to institutions referred to on articles 42, 43, and 44 of Code Regulation 130-05 concerning the fulfillment of their respective roles.	•	•		•
A.12.2 Launch an educative campaign on rights and responsibilities established in Law 2000-04.	•	•		
R.13 - Evaluate the organizational model and status of implementation of the Public Information Access Offices.				
A.13.1 Create an assessment document of the organizational structure and implementation status of the Public Information Access Offices.	•	•		
R.14 - Map the OAI (Information Access Offices) hierarchically underneath the principle authority as Law 200-04 dictates.				
A.14.1 Update the OAIs organizational chart by CONARE (National State Reform Council)	•	•	•	
R.15 - Assure that the CoA (Court of Auditors), the CGR (General Comptroller) and DGCP (General Directorate for Procurement and Acquisition) comply with their internal and external control tasks.				
A.15.1 Audits by the Court of Auditors published on the internet websites on Budget and Budget Execution.		??		
A.15.2 Audits by the General Comptroller on the allocations, payroll and payments of each governmental institution. published on the internet	•	??	•	•
A.15.3 Audit the Acquisition and Procurement Department on the legal requirements included in Law 340-06 on Acquisition and Procurement, regarding each institutions transparency policies.	•	??		•

WORKING GROUP5 – INFRASTRUCTURES	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.16.1 Create a computerized monitoring system for contract management and follow-up of the Dominican Republic's public works (a part of the procurement portal)				
A.16.1 Create a computer system.				
A.16.1.2 Creation of a Handbook of Procedures				
R.16.2 Creation of a cost index and a construction price catalogue				
R.16.2.1 Elaboration of a cost index proposal for public works, which should include price adjustment formulas and catalogue.				•
WORKING GROUP 6 – PUBLIC HEALTH	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.17 Creation of a unified and single supply system for the National Health Care System public subsector.				
A.17.1 Create and develop a single system of supply for the public subsector.	•	•	•	•
A.17.2 Ensure the compliance with Law 340-06 and its regulations for the medical and sanitary provisions acquisition process.	•			
A.17.3 Promote access to the health sector authorities which purchase drugs and sanitary supplies through the Dominican entry acquisitions.	•	•	•	•
R.18 Create a drug management subsystem for the health care supplier's network.				
A.18.1 Define and update the Health Care Network Model and elaboration of the Public Services Network Development Strategic Plan which integrates the Pharmaceutical Administration.	•	•		•
A.18.2 Strengthen the participation of the watchdog bodies in the audit and control activities concerning Public Health Care Institutions that carry out purchase and hiring processes.	•	•	•	•
A.18.3 Unify the drug and sanitary supply purchasing system of SRS through PROMESE/CAL	•			•
R.19 Strengthen PROMESE-CAL's capacity to unify all medical supplies purchases.				
A.19.1 Strengthen PROMESE-CALs capacity to answer all needs of the Public Network of Health				
A.19.2 Definition and establishment of coordinating mechanisms with SRSs for a national consolidated purchase system through PROMESE.				

R.20 Strengthen the regulatory capacity of the Drugs and Pharmacies Directorate-General of the Ministry of Health.				
A.20.1 Update the legal and regulatory framework of regulation 246-06.		•	•	
A.20.2 Promote the Rational Use of Drugs report among professional subscribers, salesmen and users.			•	
A.20.3 Update of the Basic Medicine Framework and definition of a National Medical Supply Catalogue that includes drugs.	•	•		•
A.20.4 Strengthen the Customer Service Office.				
WORKING GROUP 7 – EDUCATION	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.22 Strengthen the registry, analysis and validation mechanisms.				
A.22.1 Strengthen the registry, analysis and validation mechanisms for compliance with the schedule, school calendar and quality time use in schools.	•	•	•	
A.22.2 Creation of a reporting system on the achievement of scholar results, educational centers, district and other education-related businesses.	•	•	•	
R.23 A pilot distribution supply test to stimulate educational quality.				
A.23.1 Create a pilot project to improve educational quality				
WORKING GROUP 8 – ENERGY	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.24 – R.24 Select outsourcing companies based on defined criteria.				
A.24.1 Establish clear outsourcing companies' select requirements and review current selection criteria in order to determine which meet the new criteria.		•		
A.24.2 Prepare a list printout of the "non eligible" companies, which should not be hired by any company within the industry.	•			
A.24.3 Prepare a process standardized manual for outsourcing services in the energy distribution sector.	•	•		
R.25 Create an information webpage for the electricity sector.				
A.25.1 Get baseline information.				
A.25.2 Standardize information and establish a process to collect it automatically.	•	•	•	•
A.25. 3 Establish communication procedures among databases.				
A.25.4 Build website – programming and testing.				
A.25.5 Publish the online information entry.				

R.26 Energy Audit Certification companies program				
A.26.1 Courses to certify companies and professionals.				
A.26.2 Create a Stock test metering equipment for to lease or lend				
A.26.3 Start an energy measurement program with DIGENOR.				
A.26.4 Evaluate and certify professional individuals and/or companies.		•	•	
R.27 - Implement an awareness campaign on energy saving				
A.27.1 Carry out an educational campaign to promote a better use of electrical.	•	•	•	
A.27.2 Prepare educational material.				
A.27.3 Prepare radio and television advertisements.				
A.27.4 Establish an Energy Efficiency Award.				
A.27.5 Implement a program for energy efficiency among government agencies.		•	•	
WORKING GROUP 9 – WATER	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.28 Implement an appropriate legal framework.				
A.28.1.1 Elaborate and promulgate the Water Bill.				
A.28.1.2 Elaborate and promulgate the Potable and Water Quality Bill.				
A.28.1.3 Reformulate and approve law regulations.			??	
R.28.2 Create or adapt an institution for a sector adequate control.				
A.28.2.1 Revision of the current legal framework in order to identify a single water regulatory supervising entity in the industry.	•	•	•	•
A.28.2.2 Design and initiate functions, organizational structure, processes and procedures for the	•	•	•	
A.28.2.3 Design and initiate processes and procedures for the coordination of the supervising entity with the industry's institutions.	•	•	•	•
R.28.3 Establish management contracts for an efficient service.				
A.28.3.1 Design and implementation of management or performance contracts to the executants' entities.	•	•		
A.28.3.2 Design and implementation of a pilot project to decentralize management and delivery of irrigation services.				
R.28.4 Apply and monitor service management contracts.				
A.28.4.1 Elaborate strategies and operating capacity.				
A.28.4.2 Financial aid to the institutional reforms.				

WORKING GROUP 10 – MONITORING ENTITIES	Mar 2011	Jun 2011	Oct 2011	Dec 2011
R.29 – R.29 Strengthening control bodies through the implementation of the strategic plans of the CC (Court of Auditors), CGR (General Comptroller) and DGCP (Directorate for Procurement and Acquisition).				
A.29.1 Strengthen the Court of Auditors towards a beneficiary perspective.				
A.29.2 Strengthen the Chamber of Accounts towards a process oriented perspective.		•	•	•
A.29.3 Strengthen the Chamber of Accounts towards a human resources oriented perspective.		•		•
A.29.4 Reinforce the Republic's General Comptroller institutionally.		•		•
A.29.5 Implement of SINACI and NBCI.				
A.29.6 Theory -Practical capacity building program for the Directorate for Procurement and Acquisition. (?)		•	•	•
R.30 Increase participation of entities and its titleholder's in the strengthening of their internal control environment.				
A.30.1 Presidential announcement event with all high ranked officials to declare 2011 as the "Year of Democratic Institutional Strengthening".				
A.30.2 Elaborate an activity schedule to promote the "Year of Democratic Institutional Strengthening".				

NOTES

- 1. Using a review of the literature on recent impact evaluation and randomized field experiments in projects increasing transparency and accountability, this "sandwich" approach is well documented in Fox (2014).
- 2. The International agencies that supported IPAC are: the Spanish Agency for Development Cooperation (AECID), the Embassy of France, the Embassy of the Kingdom of the Netherlands, the Embassy of the United Kingdom, the Inter-American Development Bank (IDB), the Delegation of the European Union (EU), the Embassy of Canada, the Organization of American States (OAS), the International Organization for Migration (IOM), the Pan-American Health Organization (PAHO), the United Nations Children's Fund (UNICEF), the United States Agency for International Development (USAID) and the World Bank (WB).
- 3. This reform is currently being documented as a case study of the IPAC role in promoting change.

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