Becerril Chávez An Evaluability Model for Anti-Corruption Programs

Revista de Administración Pública



An Evaluability Model for Anti-Corruption Programs: a proposal*

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Foreword

In its original edition in 2009, the *Global Corruption Barometer* reports that citizens consider that their governments have not fought corruption effectively (this opinion has lingered over the years) and that in some regions, the problem is increasingly frequent; this data is reflected on the corruption perception or experience index analyzed in the previous chapter¹. The dark concept of corruption and the imprecise diagnoses have spurred policies with unclear goals or unattainable objectives in a given period.

So, how do we measure (not through perception) the success or failure of anti-corruption policies? The lack of a unique and unchanging corruption concept, the difficulty to measure it and the multiple variables related to it make it impossible to ascertain it has increased, diminished or been eradicated: there is no evidence that shows that anti-corruption policies have failed, although there is no data that suggest otherwise. Thus, it is necessary to come up with a model to evaluate them.

The evaluability or pre-evaluation reached its peak in the 70s; it had an instrumental function to identify areas of opportunity of programs and policies. Nowadays, due to the time or resources it requires to be carried out, its use has decreased. However, an evaluability analysis continues to be relevant –perhaps even more than before– because resources are scarce and only useful evaluations should be financed. Strategically,

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^{*} Paper received on February 12, 2010. Accepted for publication on May 31, de 2010.

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See" Global Corruption Barometer 2009", Berlín, Transparency International, 2009.

evaluation analysis is also desirable: it forces public managers to align program's objectives to future tasks, identify participants and not duplicate activities. In corruption combat programs, pre-evaluation would help improve measurement tools and incorporate a politics approach based on evidence.

In this paper, I will present an evaluability model for anti-corruption programs; that is to say, I will analyze the information they require to be effectively evaluated and learn about the impact they have had on corruption. In the first part of the text, I will briefly lay out the politics approach based on evidence and the performance evaluation from which this model has been developed. The second section describes the theoretical model; I will present the steps and basic concepts of a pre-evaluation. Finally, a generic outline of evaluability, which can be used on anti-corruption policies, will be presented.

It is worth repeating I will not be doing an evaluation of the policies to combat corruption, instead I will suggest an evaluability model to determine what information should exist so that anti-corruption policies could be effectively evaluated, particularly in the policies cycle. I consider the diagnoses steps, problem definition and implementation —the way a problem is perceived comes from the measures taken to fight it, in D. Rodrick's words: "the way we deal with corruption depends on why we think it is a problem and which consequences we decide to face". ²

In an ideal world, we would know the impact these anti-corruption policies have on corruption (i.e. for each peso invested in the policy, how much corruption has decreased), without forgetting non-monetary values, which should imbibe public administration (that their effects have been accessible to all or that the sanctions have been fair). For starters, at least three elements are needed to evaluate anti-corruption policies: i) know the initial situation, ii) know what the goals are and iii) know which the deadline for those goals is. As in all public policies, we should remember that the policy is not the only variable that can impact the problem; in this case, anti-corruption policies are not the only factor that influence corruption, but one of many (quality in public service, time of waiting, reduction of costs and overall government performance) that cannot be isolated to be measured individually. Without good measurement tools, we lack a precise diagnose of the problem and the results achieved cannot be weighed. In

D. Rodrik, "Comments" en K. A. Elliott (ed.), Corruption and the Global Economy, Washington, D.C., Peterson Institute for International Economics, 1997, p. 109.

other words, when we say a policy or program was successful; we need to be clear, what is being measured?

Evaluative frameworks in anti-corruption policies, these tools must focus on the existence of measurements for public ethics, the viability of a system of integrity, its effectiveness, relevance and coherence³. Other indicators could be incorporated, such as waiting time, cost of public services, costs of information production, number of information requests and response time, electronic procedures, audits or any other thing that helps verify the intention of the intervention to be evaluated; measurable indicators and timely and reliable sources of information. If divided in various indicators, corruption can be seen in different contexts of public administration and fragmented in units that can be easily understood (instead of developing an anti-corruption program that includes all of its aspects; make small programs to fight nepotism, extortion or influence peddling, to mention some).

The literature regarding evaluability is very rare, and scarcer when referred to anti-corruption programs; no studies have been made that explain the use of an evaluability framework in a comprehensive program to fight corruption; as the one that is being presented here. Nevertheless, similar evaluations exist to determine the possibility of evaluating specific areas of anti-corruption programs; specifically joint-ventures between the public and private sectors, construction, humanitarian aid, public service provision areas (especially water), etc.

I. Anti-corruption Policies based on evidence

The United Kingdom's Cabinet Office implemented the concept of evidencebased policy after the publication of the Modernising Government White Paper in 1999.⁴

- The Evaluation Group of the United Nations establishes those objectives for an evaluability analysis. See ONU, "Normas de evaluación en el sistema de las Naciones Unidas, April, 2005, p. 9 Available at http://www.fao.org/pbe/pbee/common/ecg/234/es/ACF95A3.pdf
- One of the modernization commitments made by Blair's government was policy-making: make policies have relevant results and not only answer to short-term pressures the Centre for Management and Policy Studies were created. See Cabinet Office, Modernising Government, White Paper. London, Cabinet Office, 1999. Available at http://www.nationalschool.gov.uk/policyhub/docs/modgov.pdf). See also, Professional Policy Making for the Twenty First Century Report. London, Cabinet Office, 1999. This paper details the government's actions to include the evidence-based approach to policy-making, concluding that "ensuring policy-making is based on evidence means fighting two problems: the need to increase the capacity of ministries to make a better use of evidence and the need to improve the access policy-makers have to that evidence" (p. 37).

Available at http://www.nationalschool.gov.uk/policyhub/docs/profpolicymaking.pdf

The British Labour Party, which tends to be pragmatic tan ideological, adopted the motto: "what matters is what works". The concept has however spread to other countries⁵. Policies based on evidence refer to the use of research and evidence to develop and evaluate public policies; this approach supports making informed decisions on policies, programs and projects by taking into account available evidence to develop and implement them in a better way.

One important feature of this approach is that it objects *opinion-based policy* which only uses certain evidence (clinical studies that have no quality) or people or groups' beliefs that have not been validated and that are mostly inspired in ideologies, prejudices or speculations⁶. The problem is that the government may only decide to use the evidence if it supports its decisions. The publishing of guides to use evidence, like the ones in the European Union, is the first step to avoid the using of "selective evidence" and to call for the use of different sources of information to develop public policies; even when evidence is opposite to the government's perspective. This is precisely the case of anti-corruption policies: corruption measurements and instruments implemented to fight it are based on ideologies and have not been proven effective or useful to decrease corruption.

The effectiveness of anti-corruption policies is relevant; after reforms to the new public management were carried out; a lot of pressure fell on the government to be legitimized through results of their policies and evidence of knowing what policy works on what specific context. Policies based on evidence are named after evidence-based medicine: what matters now are the results, proof that medicines work to solve the problem⁷.

This approach establishes that policies would be better if we could learn how political mechanisms allow change in social systems to achieve desired goals. The evidence of the effectiveness of options to make decisions and

- It was not until the year 2002 when the European Union published a guide with experts' advices on public matters, that it was obvious that the recommendations had to be clearly stated, who issued them, how were they supposed to be used, and which were the alternatives. This would have to be followed by all members and their institutions. European Commission, Governance in the EU: A White Paper. Brussels, EC, 2001. Available at http://europa.eu.int/comm/governance/white_paper/index.htm
- P. Davies, "Is Evidence-Based Government Possible?" in <u>Jerry Lee Lecture</u>. February 2004, Washington D.C. p. 3 y ss. Available at: ttp://www.nationalschool.gov.uk/policyhub/downloads/JerryLeeLecture1202041.pdf
- In fact, the evidence-based movement started in health policies in the National Institute for Clinical Excellence in the United Kingdom; however, this has spread to other types of policies, from education to justice and social readjustment.

the evidence of the evaluation made to the implemented policies will help the decision-making process within public administration; it will be useful to determine if the process should continue or what adjustments policies require to be taken into account for future efforts.

In current governments, evaluation should be very important so as to give information about performance, increase accountability and control results. According to I. Sanderson, there are two forms of evidence required to increase government effectiveness⁸:

- Evidence to increase accountability through achieved results.
 This evidence usually depends on performance and is obtained through indicators and objectives.
- Evidence to increase effectiveness of policies and programs.
 This type of evidence addresses how policies work on different contexts.

Both of the aforementioned types of evidence are relevant if they are available to decision-makers in every level of the public policy cycle, although they tend to be even more important in the development, formulation and implementation of a diagnosis⁹. Even though I think both types of evidence are important, the next pages will focus on the second type —evidence to increase effectiveness of policies and programs— because it helps learn how public policies change social systems and identify which variables cause change.

Different types of evidence can help the policy-making process: systematic studies or meta-studies that have transparent and specific criteria; case studies (most used evidence even though theirs results are hard to extrapolate because they are limited to particular circumstances); pilot studies (pilot studies are difficult to performed in government contexts due to their cost and time; besides, they cannot only benefit certain users – pilot users— and exclude the rest of the population like the private sector does); evidence of experts (some countries like New Zealand, Canada and the United Kingdom have very clear guidelines for the use of opinions of experts in policy-making); internet evidence; statistic models; and finally, economic evidence (studies of cost, cost-benefit and cost-efficiency).

⁸ I. Anderson, "Evaluation, Policy learning and Evidence-based Policy Making", in <u>Public Administration</u>, 81 (2002), p. 3.

W. Solesbury, "Evidence Based Policy: Whence it Came and Where it's Going", in <u>ESRC UK Centre for Evidence Based policy and practice</u>, London, Queen Mary-University of London, 2001, p. 8. Available at: http://www.kcl.ac.uk/content/1/c6/03/45/84/wp1.pdf

Regarding the types of evidence, I would like to explain two things: first of all, research does not equal evidence: a lot of studies have objectives that are not clear, un-rigorous designs and methodologies, inadequate statistics, poor data selection and conclusions that do not emerge from the data presented. Both the government and the population should become intelligent clients and demand objective studies that ensure methodological quality. If we want public policies to be based on evidence and not on ideologies or conjectures; we must demand information on cost, effectiveness, efficiency, impact and performance of public policies. However, if we want to make the most of this evidence, we must make it available to the population. Researchers and evaluators need to use a simple language that can be understood by citizens and non-specialized policy-makers.

Secondly, the human capital (experience, *expertise*, and work flexibility) is relevant elements in policy-making; nonetheless, not all the time and not everything can be based on evidence; on the contrary, this would limit the capacity to innovate. Experience and *expertise* are not evidence, they are anecdotes which do not substitute evidence; however, they are essential to distinguish when the latter is mistaken or incomplete. Evidence does not want to replace these elements, but to include them into the decision-making process as one of the most important factors in policy-making: contingencies and pragmatism, experience and expertise, discretional, resources, values, tradition and organizational culture, pressure groups and council members¹⁰.

Evaluation must be planned jointly with implementation to explain 'how much' was achieved, and also 'how' it was achieved. The aforementioned should be done through a theory that explains how the program achieved its results and tests the validity of its assumptions so as to assess if the interventions have had the desired effects. These causes and reasons make it necessary for the validity of the conjectures that led to the implementation of a policy to be proven in every opportunity. Evaluability makes it possible for us to know if it worked and furthermore why it worked.

II. Performance evaluation of anti-corruption policies

Performance Evaluation is understood as a systematic and regular measurement of obtained results compared to those that have been planned¹¹.It allows the citizens' interests and public employees' tasks to be

¹⁰ P. Davies, op. cit., p. 6.

J. C. Bonnefoy and Marianela Armijo, <u>Indicadores de desempeño en el sector público</u>, Santiago de Chile, ILPES-ONU-CEPAL, 2005; p. 13.

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regulated when conditioned to the allocation of resources. Thus, moving from a traditional public administration –focused on inputs, attached to rules and procedures— to an administration centered on the fulfillment of quality and quantity objectives.

The relevance of performance evaluation when proposing an evaluability analysis for anti-corruption policies emerges because this evaluation works as evidence to increase accountability (the first type of evidence described earlier). Performance measurement is important in policy-making –especially in implementation, evaluation and in budget process—because it increases the information available to managers, politicians and citizens and also because it can be used as evidence to decide about the implementation of policies. It also encourages public employees to act efficiently, since their performance will determine their resources. This reduces –but does not eliminate— control over supplies and procedures and therefore imposes new controls over the programs' outputs and outcomes¹².

This becomes relevant considering that citizens finance all government activity. Why would citizens continue to finance policies to fight corruption that have not yielded results? The resources allocated to any policy are the point of convergence between public administration, finances and politics; the administration's presumptions, goals and priorities for a given period of time expressed in figures. In other words, it is established how the taxpayers' resources will be spent, reflecting not only strategy and priorities, but the population's demands also. J. Mejía mentions that a public administration that favors results over procedures improves organizational performance and achievement of objectives¹³.

Performance evaluation increases efficiency, effectiveness, and accountability and promotes strategic planning, as well as decision-making decentralization by bringing public administration closer to the citizens. Performance management is more than policy evaluation; it is a way to integrate the entire policy-making cycle so as to distribute public resources efficiently, help the decision-making process within the organization and align objectives with the tasks to be done. Maybe its main contribution is that it provides more information to policy-makers, politicians and citizens;

D. P. Moynihan, "Managing for Results in State Government: Evaluating a Decade of Reform", in <u>Public Administration Review</u>, January-February 2006, p. 79.

J. Mejía Lira, "Evaluation as a tool for a results-oriented management. Evaluation practice in the Mexican public field", in 8th International CLAD Congress on State Reform and Public Administration, Panamá, November 2005, p. 3.

reducing the uncertainty inside and outside organizations. On the following section I will describe its relevance for each political actor¹⁴:

- a) Public employees: Gives them greater flexibility in their tasks and makes them responsible for their results, which improves performance by encouraging them to do a better job by recognizing it as their own, besides it forces them to direct their evaluations towards efficiency, effectiveness and relevance.
- b) Politicians: Increases the information on how to distribute resources to where they are needed or to make the most of them. It shows them the cost of opportunity to allocate resources to one program or another. Allows them to come up with new actions (such as civil service laws) to hire public employees because of their technical capacity.
- c) Citizens: Allows them to compare results and consequently punish or reward politicians. Increases transparency and accountability by making goals and achieved results to be public. Furthermore, through citizen evaluation and monitoring mechanisms on the administration's performance; it increases the general population's participation and makes them be directly involved in the improvement management process.

From the previous paragraphs we can conclude that the use of a performance evaluation system will ensure information is available to evaluate individual public employees, as well as entire areas and achieved goals¹⁵. Information yielded from performance systems can be used to assess the feasibility of conducting an evaluation of different levels. Moreover, a result-based management system would help political evaluation because:

- 1. It includes initial and monitoring indicators, standardized to compare programs.
- 2. Each indicator is tied to specific goals.
- 3. It creates reports that compare results and goals.

D. Arellano, "Dilemas y potencialidades de los presupuestos orientados a resultados: límites del gerencialismo en la reforma presupuestal", in 6th International CLAD Congress concerning State Reform and Public Administration, Buenos Aires, November 2001, p. 4 y K. Willoughby y J. E. Melkers, "Implementing PBB: Conflicting Views of Success", in Public Budgeting & Finance, 20 (2000), p. 56.

See also the article by Miquel Salvador, included in this issue of RAP

4. Uses information for accountability and decision-making. Reports on results should be used to modify the allocation of resources.

This information will be an input when conducting an evaluability analysis and an evaluation on public policies and will be particularly relevant in anti-corruption policies, since these are not limited to a specific area within public administration and indirectly require differences in implementation and areas to be identified to detect areas for improvement and areas for success. From a strategic point of view, as long as performance evaluation systems are comprehensible and used in the decision-making process; citizens can know how their taxes are being used, politicians can assess the quality of services and public employees can identify the best programs, organizations and individuals and those that need to be improved 16.

The responsibilities concerning the monitoring and evaluation of public employees' performance in the implementation of policies to fight corruption are established in the same anti-corruption documents; although there are some operational and coordination problems among agencies to do so. A department can carry out this responsibility or ministry that directly reports back to the head of the federal public administration, thus, it should have enough authority to make other ministries obey.

III. Public Policy Evaluability

Evaluability is defined as the extent to which a program can be evaluated, that is, to what point information can be obtained regarding their contents and objectives and verifying their expected results. This should not be confused with policy evaluation, which is "the effort to bring together and analyze information concerning essential aspects of politics so as to know if the policy has achieved programmed goals" 17. Evaluability, as seen in the previous definition, has two parts:

- 1. The first part refers to the formulation of a public policy: the clarity of objectives and goals, the presence of indicators to measure if they have been achieved, the way to use them and their relevance to know if the policy was successful.
- 2. The second one concerns execution and policy results: if there is any available information, if it can be obtained or if it is relevant or appropriate.

¹⁶ J. Mejia Lira, *loc. cit.*, p. 3.

¹⁷ J. Bertok (ed.), Public Sector Integrity: A Framework for Assessment, Paris, OECD, 2005, p. 24.

Combining these two aspects leads to clearly defined data of execution and results, the policy will be more evaluable; if the objectives are dark and it cannot be proved how the program was executed or what the results were, it will be less evaluable (see Figure 1).

Let me return to the difference between evaluability and evaluation. Generally, the first precedes the second one because it is a qualitative analysis –or if a high level of technical terms is required, also qualitative—about the possibility of evaluating a program. It can also be said that the conclusions of a feasibility analysis would say if an evaluation is justified, possible and will yield useful information. On the other hand, an evaluation is a measurement of results and impacts of a program. To design an evaluability analysis –step taken before an evaluation—a decision has to be made as to which analytical model of public policy evaluation will be taken into account¹⁸:

- 1.- <u>Goal evaluation</u>: this evaluation regards institutional change in the private sector, which is a slow process over time. The process is made up of different phases from formulation to implementation of reforms. These phases in practice are not clear, they overlap each other.
- 2.- <u>Result evaluation</u>: in this evaluation, institutional change is a dependent variable, thus, it must be explained as a result of administrative reforms that are independent variables while changes and goals of new policies are dependent variables (improvement in efficiency, output increase, better performance, etc.).

Even though it is not one of the most used tools in pre-evaluation, I will use the logical framework matrix (it is usually used only in project planning), because it allows to identify and link actors involved in the problem, define the appropriate solution to solve it through objective and alternative analysis. The logical framework matrix is used to analyze the vertical and horizontal logic of the project through objectives, variables, indicators and available information; in other words, it must reflect the current situation of the program, thus, determining the extent to which it can be evaluated 19.

H. Wollmann, "Public Sector Reforms and Evaluation: Trajectories and Trends. An International Overview", Special issue of the <u>International Journal of Political Studies</u>. September 2001, pp. 16 y 17.

Many programs and public policies, particularly those focused on fighting corruption, have not been designed taking into account the logical framework method. When analyzing their evaluability, including the logical framework matrix, it is necessary to perform a reconstruction exercise of the different levels of the program's objectives and of their results' indicators to measure the level of achievement.

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The steps of the logical framework are: 1) analysis of the involved ones, 2) problem analysis, 3) objectives analysis, 4) alternatives analysis, 5) logical framework matrix.

Hierarchy of objetives	Logical framework matrix			
	Narrative summary	Performance indicators	Sources and means of verification	Risks and conditions
1. Aim (impact)				
2. Purpose (Results)				
3. Component (Goods and Service)				
4. Activity (Actions and Processes)				

Source: author's elaboration based upon H. Camacho, et.al. El enfoque del marco lógico: 10 casos prácticos. Madrid, Fundación CIDEAL, 2004.

The aim (impact) is the superior level objective to which the project contributes. The purpose (results) is the specific contribution to the solution of the diagnosed problem or the concrete objectives of the project. The components (goods and services) are the goods and services that the program produces or provides to fulfill its purpose and the activities are the tasks that have to be done to achieve the components. External factors can be assumptions, design and implementation risks of the project.

Here, I will use the matrix to analyze the evaluability of the formulation or design of the program, so as to take advantage of its double logic. In the first place, **vertically**: it explains how the objectives of different levels are linked together; reading the matrix from the bottom up means the inferior activities have to be carried out to reach the top levels (results, purposes and aims). Secondly, **the horizontal axis**: shows that it is not enough to follow the activity-objective chain, necessary conditions (assumptions) have to exist and measurements that make it possible to determine if each level has been completed.

Because of this, the logical framework matrix allows us to identify problems in projects –i.e. if they have multiple objectives that are not clearly related to the project's activities or if indicators to know if they are being executed successfully or not were included- and lets us know what kind of outputs

the program must produce to deem it successful; this gives evaluators an objective basis to compare implementation with planning.

To analyze the evaluability of execution and results, I will analyze the available information concerning these two phases of the programs life. The required data can be obtained from primary sources (measurements done by the interested party to obtain the information) or secondary ones (consult measurements and conducted studies). Secondary sources of information are less expensive and therefore the preferred ones; if these are not found it is necessary to work with primary sources to collect and generate data (this will increase the cost of the process and it will take more time). The truthfulness and the possibility of verifying the existent data must be considered.

The feasibility analysis of the evaluation should also consider who is asking for the evaluation, type of exercise evaluation (cost-benefit, cost-efficiency, multi-criteria of the performance of public employees or of the organization), its future use (if the elements provided by the evaluation will be taken into account in the decision-making process or will they be ignored) and what obstacles could appear during the evaluation (reluctance exhibited by public employees to be interviewed and provide information, political infeasibility to institutionalize a systematic evaluation system during the project).

Both aspects of an evaluability analysis –regarding formulation on one hand and execution and results on the other- are depicted in the following graph:

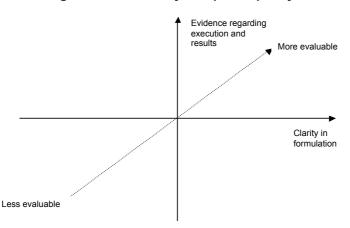


Figure 1: Evaluability of a public policy

Source: Developed with the assistance of P. Estrada, based upon M. S. Trevisan and Y. M. Huang, "Evaluability assessment: a primer", in <u>Practical Assessment, Research & Evaluation</u>, Vol. 8 (2003), No. 20. Available at: http://PAREonline.net/getvn.asp?v=8&n=20

To explain more clearly the procedure I have followed to analyze the feasibility of evaluating anti-corruption programs, I will consider five tasks that are recommended²⁰:

- 1. Study the history, design and operation of the program.
- 2. Observe the program in action.
- 3. Determine the capacity to collect, manage and analyze information regarding the program.
- 4. Analyze the program's probability of achieving objectives and goals.
- 5. Determine if an evaluation will or will not help the program or its stakeholders, understood as users of the system.

IV. Anti-corruption policies and their evaluability

Performance measurements of the public sector, according to M. Schacter, have been focused on what the government has done and not on the results achieved²¹. I propose this evaluability model to take another step forward in measuring government results, particularly anti-corruption policies. A comprehensible performance system must account for its instruments and the evidence of its impact. Thus, indicators must not measure used resources (*inputs*) and developed activities (*outputs*), but their impact outside the organization.

To determine the information needed to evaluate an anti-corruption policy, I base my work on the *Public Sector Integrity. A framework for Assessment* published by the Good Governance Committee of the OCDE in 2005. According to this document, the problem when evaluating integrity and anti-corruption policies lies in the definition of its criteria and not of its procedures²². The steps proposed to evaluate these types of programs are:

- 1. Define the evaluation's purpose.
- 2. Define the evaluation's subject.
- 3. Organize the evaluation operationally: Internal or external? When is it going to be done? How much money is going to be spent on it?

Juvenile Justice Evaluation Center-Office of Juvenile Justice and Delinquency Prevention, Evaluability Assessment: Examining the Readiness of a Program for Evaluation, Washington, DC. Available at http://www.jrsa.org/jjec/about/briefing_evaluability-assessment.html.

M. Schacter, <u>Means, Ends, and Indicators: Performance Measurement in the Public Sector.</u> Canada, Institute on Governance, 1999, p. 2.

²² J. Bertok, *op. cit.*, p. 22.

- 4. Establish the evaluation's methodology.
- 5. Integrate the evaluation's results on the cycle of policies.

According to the considerations mentioned earlier, to analyze the feasibility of an anti-corruption policy, two axes are required: *i) clarity in the formulation and ii) execution and results evidence*. By evaluating these axes, I will be able to do a comprehensive analysis regarding the evaluability of this policy — as mentioned earlier. On one hand, I will identify the necessary information to design and evaluate the policy. On the other hand, I will also identify the information necessary to evaluate the way the program was implemented and its results.

- *i)* Clarity in the formulation. In this section I will analyze the design of this public policy; thus, the first programmed task will be fulfilled. Clarity in the formulation makes reference to two variables:
 - 1. <u>Planning</u>. Understand deeply the diagnosis of the program, clear identification of the problems.
 - Objective definition. Objectives must be explicit and quantifiable
 -essential to know if it has been successful or not- and especially
 to know if those objectives are related to the problem and how
 (hence the importance of evidence-based policies).

To analyze the clarity of the formulation, I will use the first axis that talks about the formulation of the program: clarity of the objectives, their strategic link to the programs' general aim and their presentation through measurable indicators (intermediate and final).

ii) Execution and resulting evidence. In this section I will analyze the details of the program's execution and its results. Execution and result evidence in this evaluability analysis is intimately linked to the operational efficiency of the project.

As part of this evaluability analysis, a scale to identify the information available to develop it is presented; based on the model by J. S. Wholey.²³ I will use a scale from 1 to 10 as follows:

0	There is no available information.	
1-4	Regular, irrelevant or ambiguos information	
5-7	Good, relevant information, but insufficient.	
8-10	Excellent, relevant information and sufficient to evaluate the program	

^{23 &}quot;Assessing the Feasibility and Likely Usefulness of Evaluation" in J.S. Wholey, H.P. Hatry y K.E. Newcomer (eds.) Handbook of Practical Program Evaluation. San Francisco, Jossey Bass, 2004.

Diagnostic.

- a. Has the problem been identified clearly according to some type of indicator?
- b. Has a map of the involved actors (beneficiaries, government agencies, service providers) been developed?

• Formulation.

- a. Is the chosen alternative the most adequate to solve the problem?
- b. Do the proposed objectives have measurable results?
- c. Have the sub-stages of the implementation been designed clearly and are they linked to the general objective? Can it be measured if they are being implemented according to planned?

• Implementation.

- a. Is there information on the program's execution?
- b. Is the available information related to the programmed objectives?
- c. Is there any information on the program's operative efficiency in different levels: users, regulators and providers of services?

Evaluation.

a. Does the available information make it possible to conclude to what extent are the programmed objectives being achieved? Is it possible to identify what sections of the program require modifications?

Final remarks

The pre-evaluation is relevant to any public policy because it helps align its strategic objectives with the performed tasks, identify relevant actors and activities with the results. It is especially important for anti-corruption policies because they are policies that, despite their popularity, have not been thoroughly evaluated and are based on ideologies and assumptions and not on evidence that their tasks decrease corruption.

The evaluability analysis forces organizations to manage efficiently one of the most valuable resources: information. A pre-evaluation makes organizations identify, not only the definition of the problem, but also the design of the policy, what information will needed to evaluate it and what information systems should be developed to make it available. Thus, public employees have the opportunity to use the information capital that has been developed and lost when integrated to the organizational decision-making process and integrate it to the policy-making cycle.

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However, before using the evaluability model to any anti-corruption policy, its limitations have to be understood. The uses an evaluability analysis has are defined by the will to integrate its results to the public policy cycle, not only use them to determine the viability of the evaluation. If incorporated to the public policy-making, evaluability could be used to: improve the design of the policy (define, from the beginning what information will be required to decide if it was effective or not), make its implementation more effective (identify areas of opportunity in its management), and define if evaluation is possible and what it can be used for. It can even be included in the budget process as part of a performance budgeting system.²⁴

For Anti-corruption programs, pre-evaluation theories about the program's design are not developed; information about its design is extracted from documents and actors. Its major limitation probably comes from the consensus regarding the evaluation's objective between those who make the policy and those who implement it; if this is the case, even if a pre-evaluation and exhaustive evaluations are developed, its results will not be used to improve the said program when:

- The evaluators and the users of the evaluation do not agree on the performance's goals and criteria to be used.
- The program's goals are not realistic because of its design, resources or activities. If this is the case, the policy has to be changed even before it is evaluated. The planned objectives will not be enough.
- There is no information available or the cost to obtain it is too high.
- Even if policy-makers and managers knew the evaluation's results, they would be incapable of changing the program. The evaluation makes sense only if there is an interest or capacity to modify the policy.

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²⁴ J. S. Wholey, op. cit., pp. 33 y ss.

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