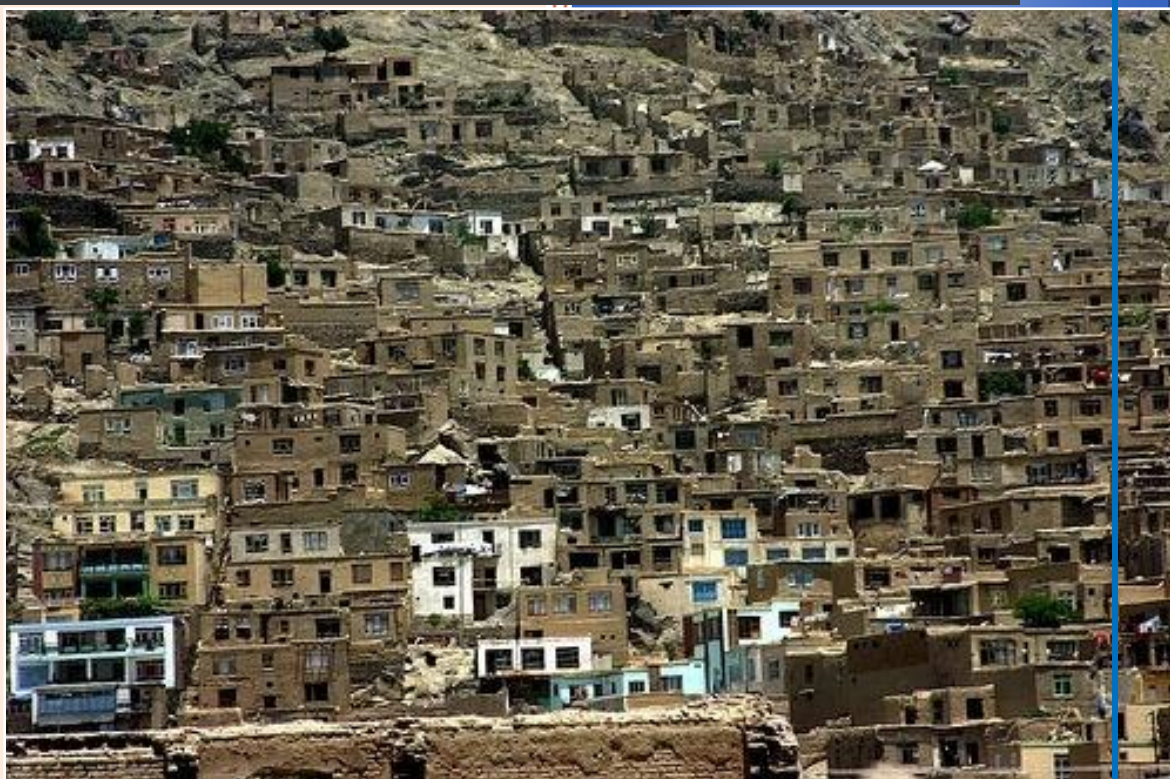




2012

Afghanistan: Final Assessment



High Office of Oversight &
Anti-Corruption
Assessment

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Acronyms

ACU:	Anti-Corruption Unit
AGO:	Attorney General's Office
CAO:	Control and Audit Office
FinTRACA:	Financial Transaction and Reports Analysis Center of Afghanistan
GIAAC	General Independent Administration Against Corruption
GoIRA :	Government of the Islamic Republic of Afghanistan
HOO:	High Office of Oversight & Anti-Corruption
IARCS:	Independent Administrative Reform and Civil Service Commission
IHRC:	Afghanistan Independent Human Rights Commission
IWA:	Integrity Watch Afghanistan
JJAARAC:	Parliamentary Commission on Judicial and Justice Affairs, Administrative Reform and Anti-corruption (JJAARAC Commission)
MCTF:	Major Crimes Task Force
MEC:	Independent Joint Monitoring and Evaluation Committee
NACS:	National Anti-Corruption Strategy
NATO:	North Atlantic Treaty Organization
NDS:	National Directorate of Security
NGO'S:	Non-governmental organizations
OAA:	Office for Administrative Affairs
UNCAC:	United Nations Convention against Corruption
UNDP:	United Nations Development Programme
UNODC:	United Nations Office against Drugs and Corruption

1. Introduction

1.1. Background¹

It is impossible to discuss anti-corruption in Afghanistan without a corresponding discussion of Dr. Azizullah Lodin². Dr. Lodin hails from a Pashtun tribe in the vicinity of Herat, Afghanistan. He attended Kabul University and received his baccalaureate degree in Political Science and Law in 1964. Subsequently, he attended the University of Koln in Germany where he received his PhD in Economics in 1975. The next year Dr. Lodin was hired to serve on the faculty of Kabul University as a lecturer in the Economics Department. In 1978, following the Communist-backed *Saur Revolution*, Dr. Lodin was arrested as a political prisoner for his involvement in anti-Communist activities. He was confined at Pule-Charkhi Prison from 1978 to 1980 during which time he was brutally tortured. After his release from prison, Dr. Lodin joined the Mujahedeen in Jihad against the Soviet Union³. He was a member of the Jabha-e-Nejat-e-Milli-Afghanistan Party which was led by Sibghatullah Mojaddedi⁴. During the period, Dr. Lodin and Hamid Karzai were very well acquainted.

After the fall of the Taliban, the newly anointed President Karzai recognized the excessive power and authority of local and provincial leaders such as Abdul Rashid Dostum in the North and Esmail Khan in the West⁵. To diffuse some of this power, President Karzai appointed Dr. Lodin as the Governor of Herat. Dr. Lodin then returned to his hometown of Herat as the newly appointed governor. However, Esmail Khan refused to recognize Dr. Lodin's authority and re-asserted dominion over Herat. The same night that Dr. Lodin arrived in Herat, a hand grenade was thrown into his house.

¹ Information derived from personal conversations with Dr. Lodin and has not been independently verified.

² Dr. Lodin is the Director General of the High Office of Oversight & Anti-Corruption with the rank of Senior Minister. His name is sometimes spelled (incorrectly) as Ludin.

³ For greater detail on Dr. Lodin's activities during the Jihad, please see: http://www.afghan-bios.info/tinc?key=2vB1wwzV&session_currentpage=data&session_mode=guest&formname=afghan_bios&session_sortby=field_3&userid=1310386681;125931;2&session_nextpage=data_edit&session_offset=50&session_start=951&session_dbkey=1255448607;130081;914_afghan_bios&dbkey=1255448607;130081;914_afghan_bios

⁴ Some reports indicate that Dr. Lodin was a member of Harakat Inqilab Islami Afghanistan led by Mohammad Nabi Mohammadi. These are not mutually exclusive and he may have been associated with both parties at different times.

⁵ Dostum is a leader of the Uzbek community while Ismail Khan is a leader in the Tajik community.

By morning of the second day, Dr. Lodin was back in Kabul blaming Esmail Khan for the grenade attack and commencing a campaign against Esmail Khan that extends to this very day. President Karzai (who could not afford, politically, to battle Esmail Khan) then appointed Dr. Lodin Presidential Advisor for Western Afghanistan, specifically including Herat.

The General Independent Administration Against Corruption (GIAAC)

By 2003 the specter of corruption was already creeping into the new government. Therefore, at Dr. Lodin's request, President Karzai appointed him as the anti-corruption czar. The first thing Dr. Lodin did was to establish a committee to develop a plan and draft enabling legislation. Appointed to this committee, besides Dr. Lodin, were Zabiullah Esmati and Nasrullah Stanekzai. The committee drafted an anti-corruption law without any policy, strategy or outside expertise. Notwithstanding, the law was promulgated resulting in the establishment of the General Independent Administration Against Corruption (GIAAC)⁶. Upon its creation, Dr. Lodin assumed the position of Director General of the GIAAC with the rank of minister. The office was originally located in the presidential palace where most of the senior positions were filled by Dr. Lodin based upon his personal relationships. A few weeks later, the office was moved to a rented building near the University of Kabul. During its first year, until March 2004, Dr. Lodin was the Director General. During that time, the GIAAC initiated and tracked about 80 cases. Most of these cases involved enemies of Dr. Lodin including a notable case against Ismail Khan (that President Karzai quashed for political reasons). Generally, the office was ineffective and operated in an informal manner; however, Dr. Lodin supported Afghanistan becoming a signatory to the United Nations Convention against Corruption which occurred on February 20, 2004. Three weeks later Dr. Lodin was appointed as the General Secretary of the Secretariat of the National Assembly of Afghanistan and Zabiullah Esmati became the Acting DG of the GIAAC.

⁶ Law on the Campaign Against Bribery and Administrative Corruption - Official Gazette No. 838, published 2004/10/11 (1383/07/20 A.P.)

Zabiullah Esmati was popular with the employees at the GIAAC and viewed as an honest patriot [this was in contrast to many of the returning Afghan-Americans who were viewed as corrupt]. During Mr. Esmati's term in office, he raised the ire of Sibghatullah Mojaddedi (leader of the Jabha-e-Nejat-e-Milli-Afghanistan Party) when he refused to hire a friend that Mr. Sibghatullah had recommended. Additionally, as an honest broker Mr. Esmati engaged in politically costly anti-corruption battles. For example, his allegations of corruption against Dr. Mohammad Atash, the President of Ariana Airlines who was an Afghan-American affiliated with Zalmay Kalilzad. Esmati underestimated the how deeply corruption was already entrenched into the new government, consequently, Mr. Sibghatullah Mojaddedi, Dr. Atash and others campaigned to convince President Karzai that Esmati should not be appointed as the permanent Director General of GIAAC. As a result, Mr. Esmati was replaced by Esatullah Wasefi, the quintessential Afghan-American crony.

The appointment of Esatullah Wasefi as the Director General of the GIAAC reinforced the public's perception of President Karzai's government and the Afghan-Americans who were now running much of the country including U.S. Ambassador Zalmay Khalilzad. Mr. Wasefi's father had been a Pashtun tribal leader in Kandahar and Minister of Agriculture under the former King Zahir Shah. However, Wasefi's experience in America did not build his character. He had been involved in drugs and was convicted and served nearly four years for the sale and distribution of heroin⁷. From his initial arrival in Maryland in 1979, through his conviction for drugs and eventually owing a pizza franchise, Mr. Wasefi was affiliated with the Karzai family. Therefore, upon his return to Afghanistan in 2001, President Karzai appointed Wasefi Governor of Farah Province. However, by 2006 corruption in his administration was so overt and the people so disgruntled that Wasefi was removed. In a politically inexplicable move but with the support of Sibghatullah Mojaddedi, President Karzai appointed Esatullah Wasefi as the permanent Director General of GIAAC in March 2007.

⁷ http://www.nytimes.com/2007/03/11/world/asia/11iht-afghan.4870436.html?_r=1&pagewanted=all

Almost immediately the international community withdrew its support for GIAAC. The appointment of Wasefi and the withdrawal of international support was not the cause of the GIAAC's failure; it was simply the last in a long line of problems such as an overly ambitious mandate, confusion about its roles (vis-à-vis other agencies); lack of leadership; inadequate resources; and an unclear policy and strategy. Rather than bringing energy, dynamism, and strong leadership to the anti-corruption effort as intended, the GIAAC appears to have inadvertently muddied the institutional waters giving rise to confusion and uncertainty⁸.

In contrast to the sinking anti-corruption efforts, administrative corruption throughout the government was burgeoning. The GIAAC was not only ineffective, it was becoming a focal point for all that was wrong in Afghanistan. At the same time, the international response to corruption had so far been disjointed and inadequate⁹. With the GIAAC failing, many of the international donors came together: the World Bank, UNDP, UNODC, DFID, and Norway. [Conspicuously absent from this international group was the United States who preferred to pursue a softer dialogue approach on corruption¹⁰.] The international donors produced an excellent document called "Fighting Corruption in Afghanistan, A Road Map for Strategy and Action." Under continuous international pressure, Afghanistan undertook two important steps: First, the government drafted a new anti-corruption law that they hoped to showcase at the Paris Ministerial Conference in June 2008. This law would abolish the GIAAC and create a new anti-corruption organization that would be called the High Office of Oversight & Anti-Corruption (HOO or HOOAC). Second, President Karzai established a high-level Inter-Institutional Committee to identify the root causes of corruption and suggest remedies; the result was a detailed report known as the Azimi Report (named after the Chief Justice of the Supreme Court Abdul Salem Azimi). Based upon what the President requested, the Azimi Report did an excellent job of chronicling the causes of corruption and suggesting remedies. It was not, nor was it intended to be, a strategy for implementation. An

⁸ *Fighting Corruption in Afghanistan, A Road Map for Strategy and Action*, an informal discussion paper (February 2007).

⁹ *Working Toward Common Donor Responses to Corruption*, UNODC, October 2009.

¹⁰ *Ibid.*

integral member of the Committee from its inception was Professor Yasin Osmani, a Presidential Advisor who was not tainted by allegations of corruption. Therefore, when the GIAAC was abolished it was a logical choice to name Osmani as the Director General of the HOO, a position he assumed in December 2008. Initially, the HOO got off to a good start. Good employees were retained and the international community, especially USAID contributed significant resources. Unfortunately, the mistakes of the GIAAC were once again repeated. Office rent that was otherwise available free of charge in a government building, exceeded \$18,000 per month in a sweetheart deal. Civil servants were paid \$200 - \$500 per month while local national “experts” hired by USAID through the Asia Foundation were paid ten times that amount. It was not long before the excitement of the new beginning wore off and the shadowy figures who had been with the GIAAC begin to seep back into the office. There was still no policy or strategy and enforcement and prevention was based upon ad hoc initiatives. Consequently, the HOO (like the GIAAC before it) was largely ineffective. One notable event, however, was the publication of the *Anti-Corruption Strategic Plan 2011 – 2013*. By the time it was published in December 2010, it was too little, too late. The flow of corruption had turned into a flood and ineffectiveness of the HOO had to be addressed. Therefore, in February 2011, Professor Osmani was forced to step down and Dr. Lodin, the nominal creator of the GIAAC, was once again appointed as the head of anti-corruption activities for Afghanistan¹¹. [This assessment began six months after Dr. Lodin assumed his position as Director General of the High Office of Oversight & Anti-Corruption.]

¹¹ Professor Osmani was subsequently appointed as the Chairman of the Joint Independent Monitoring & Evaluation Committee (MEC). However, this Assessment is devoted solely to the HOO so no discussion of the MEC is provided.

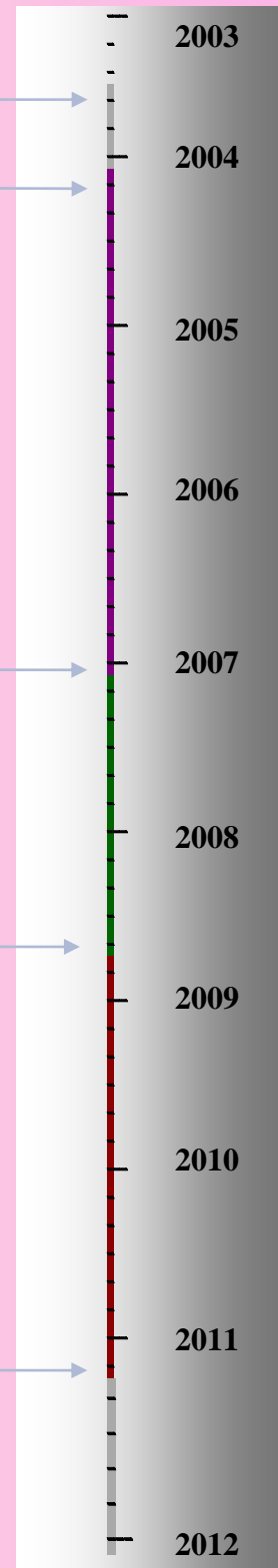
**Dr. Azizullah Lodin appointed to lead anti-corruption effort
Appointed as Director General of the GIAAC**

**Zabiullah Esmati becomes Acting Director General of the
GIAAC when Dr. Lodin accepts new position in March 2004**

**Esatullah Wasefi becomes permanent Director General of the
GIAAC in January 2007**

**Professor Osmani becomes the first Director General of the
HOOAC in August 2008.**

**Dr. Lodin appointed Director General of the HOOAC in
February 2011.**



1.2. Context of Assessment

The situation in Afghanistan finds that at the higher levels of government, the opportunity for illicit income from corruption is so great that there is tremendous competition by all factions to acquire key positions in order to maximize income. More simply put, there is extreme pressure to exploit corruption for institutionalized financial purposes. The organizational structure and operations of the major power structures have grown so dependent upon the income from corruption, that corruption is now necessary to sustain the political status quo. The atmosphere of institutionalized corruption also spawns independent actors at lower levels that permeate all social strata. As a consequence, the cost of corruption on the poor is continuing to mount and will eventually overcome their ability to pay. The result, evidenced in recent studies, indicates that the Afghan people now prefer Taliban governance over the Afghan government as a direct result of government corruption¹². Ironically, corruption fed by international spending, helps fund the insurgency. This is the environment under which anti-corruption initiatives must operate: diminishing security and unabated corruption.

2. Assessment Process

2.1. Framework

The needs assessment is a structured analytical process designed to assess and evaluate various dimensions of capacity within the broader institutional context. In certain instances it also includes an assessment of the capacity of specific units within the system. The needs assessment framework for the HOO is based on the concept paper proposed and adopted by UNDP in February 2012 and agreed upon in consultative meetings with stakeholders.

¹² The “State of the Taliban-2012”, <http://www.gq.com/news-politics/big-issues/201203/nato-report-state-of-taliban-afghanistan#ixzz26lIhQYm>

2.2. Dimensions of Capacity

National Anti-Corruption Policy (Vision)	An national consensus on the goals, models and strategy that the country will employ to achieve its anti-corruption objectives
National Strategy	A clear demarcation of roles and responsibilities in carrying out the National Policy
Comprehensive Legal Framework	Comprehensive legislation that provides both authorizing and enabling legislation
HOO Organizational Strategy	A clear strategic plan on how the HOO will carry out its mission as defined in the National Strategy
Leadership Development	Development of both management and leadership skills within the HOO
Institutional Development	Development of each department and unit of the HOO using both BPM and best practices
Technical Assistance	Provision of international experts to train and a develop local professionals and staff
Infrastructure Development	Provision of the buildings, equipment and supplies necessary to complete assigned mission
Interoperability	Based upon the National Strategy, the development of organizational skills to work cooperatively with all ministries and departments that have an anti-corruption component

2.3. Approach and Methodology

This assessment included document review, field study and focus groups within the High Office of Oversight. The Senior Policy Advisor was embedded within the HOO during the contract periods from the beginning of September 2011 to the end of November 2011 and from the middle of January 2012 to the end of April 2012. During this period, all referenced documents in this Assessment and in the Final Report were analyzed as well as all documents held by the HOO to include documents created or provided by USAID, UNDP, DFID, GIZ, and ISAF.

At the time of this Assessment the HOO had 473 authorized employees (including 15 high-level officials and 97 service staff). Its headquarters was located in Kabul with six regional offices. Dr. Azizullah Lodin is the Director General. Mr. Amin Khuramji is the Deputy Director General of Policy and Oversight and Mr. Abdul Razaq “Zalali” is the Deputy Director of Administration and Finance.

3. Findings

The High Office of Oversight & Anti-Corruption has exceptionally competent and intelligent professionals at nearly all levels of the organization. In another positive sign, the HOO has also begun to work more cooperatively with other Afghan agencies—the AGO, NDS and the MOI. The HOO has also reached out internationally to develop regional relationships in Indonesia, Vienna and Iran; however, anti-corruption expertise within the HOO remains problematic. Most importantly, the organization’s leaders require masters-level management training—including organization and delegation. Ethical concerns in some areas of the operation also remain a leadership challenge. Consequently, as an anti-corruption organization, the HOO does not yet meet minimum international standards.

Dr. Lodin is an Afghan patriot with a lifetime of dedication to his country. As the chairman of the High Office of Oversight & Anti-Corruption, he has proven to be a concrete thinker who is operationally focused and prefers prosecution over process. Based upon experience and observation, Dr. Lodin is not corrupt and it would be highly unlikely that he would ever be involved in contract fraud as was recently alleged¹³. On the other hand, Dr. Lodin intertwines his political interests *and* the political interests of the President with the overall interests of Afghanistan. That is, he views them as one-and-the-same (i.e. what is good for President Karzai is good for Afghanistan). During his term as the Chairman of the Independent Election Commission, this intertwining of interests caused great angst in the international community.

Recently, Dr. Lodin made some high-profile allegations concerning at least four ministers and approximately 140 corruption investigations have been announced concerning other high ranking government officials. While the focus of the leadership has been on operations, the HOO has continued to flounder as an organization.

¹³ Kabul News September 5, 2012, “The Defense Committee accuses Azizullah Lodin, head of the High Office of Oversight and Anti-Corruption, of accepting a bribe from the Five Star Company.”

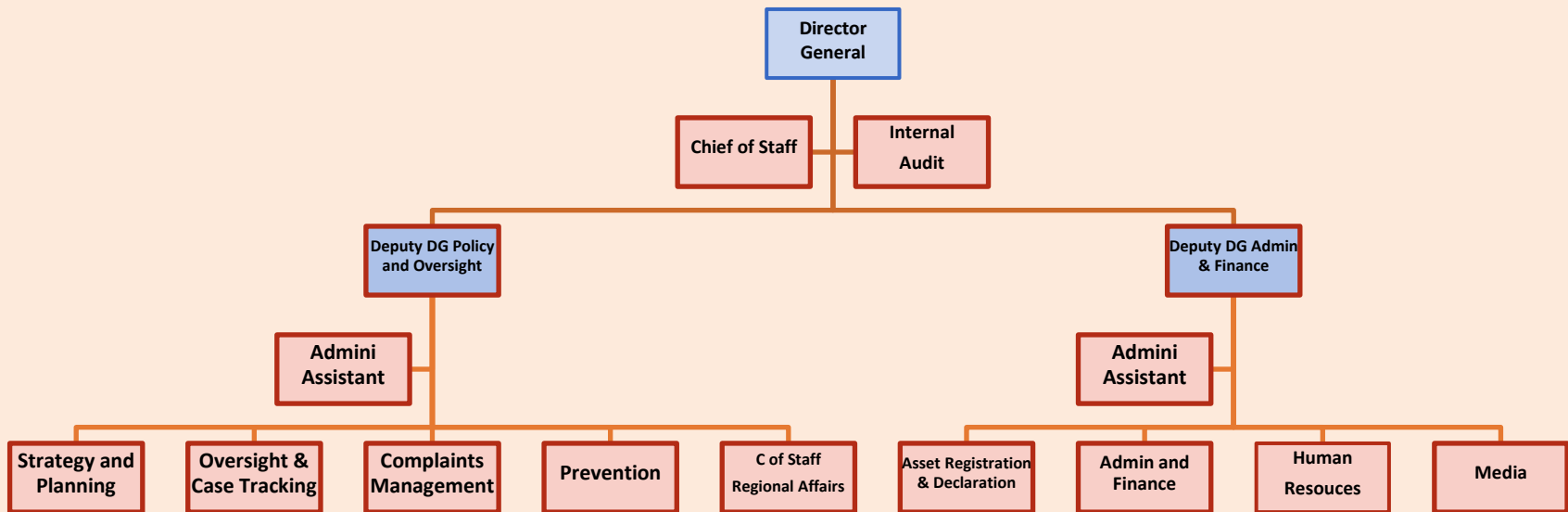
As a general rule, anti-corruption agencies such as the HOO are systematic, process-oriented organizations. To address the escalating administrative corruption within the government, however, Dr. Lodin has taken a more autocratic approach. Consequently, within the donor community, the HOO has lost credibility and many donors simply want to abolish the HOO as they did the GIAAC before it. The one notable exception is the Economic Cooperation Organization (ECO) who, through the Iranian General Inspection Organization, are expanding their ties with the High Office of Oversight¹⁴.

From an operational perspective only a few of the individual departments of the HOO function remotely near an international standard even though many of the senior leaders and managers are well educated and competent. That said, a cabal of ethical challenges remains as a growing and persistent problem and there are no less than three on-going investigations concerning forged academic credentials among senior staff.

Reporting to Dr. Lodin are two Deputy Director Generals with the rank of Deputy Minister: Mr. Khuramji (DDG Policy and Oversight) and Mr. Abdul Razaq “Zalali” (DDG Admin & Finance). Mr. Khuramji is perhaps the best trained of the senior management. He attended the University of Kabul majoring in Law. Following the rise of the Taliban in September 1996, Mr. Khuramji fled to Iran where he earned a degree in Islamic Philosophy from the religious howza in Qom. Thereafter, he received a traditional Bachelor of Arts degree in History from the Free Islamic University in Tehran and a Master of Arts degree in International Relations. Mr. Zalali, on the other hand, has more than 25 years of government experience in the Ministry of Aviation—under the Soviet government, the Taliban and then under the current Republic. Mr. Zalali was recruited to the HOO in 2008 as the Director of Administration & Finance. In 2010, Mr. Osmani elevated him to Deputy Director General. Mr. Khuramji, came to the HOO in 2010.

¹⁴ See *Anti-Corruption In the Economic Cooperation Organization: A Confluence of Security, Intelligence and Investigation* by Jeffrey Coonjohn 2012. This initiative is led by Dr. Lodin and Mr. Zalali within the HOO.

Whereas Dr. Lodin finds his political support in President Karzai, Mr. Khuramji is aligned with 1st Vice President Marshal Fahim and Mr. Zalali is loosely allied with 2nd Vice President Karim Khalili. Together with the department directors, these men make up the senior management and leadership of the HOO.



Chief of Staff Abdullah Hafiz Behrose

Strategy and Planning Department: Director Mohammad Amini

Oversight & Case Tracking Department: Director Sayed Mohammad Sapand

Complaints Management Department: Director Abdul Zahid Abdul Wahid (aka Wahidullah Zahid)

Prevention Department: Director Ehsanul Haq Ehan

Chief of Staff for Regional Affairs: Vacant

Asset Registration Department: Director Nader Mohseny

Admin and Finance Department: Director Muhebullah Halili (aka Mohebullah Helili)

Human Resources Department: Director Zabihulla Sarwary

Internal Audit Department: Director Ms. Nasreen Salehe

Brief Departmental Overview:

Human Resources: With the assistance of the international community, the Human Resources Department has a modicum of authenticity. There are job descriptions for most positions, there are hiring criteria and there is a hiring process which is in accordance with the national civil service regulations. The hiring process is mostly documented and can withstand a cursory audit. Underneath the veneer, however, there remain deep rooted issues. First, there are no “published” vacancy announcements, per se. All job announcements are pinned to a bulletin board outside the HR Office. There is no corresponding announcement on radio, TV, internet or in the newspapers. Since the public does not have access to the HOO, all announcements are conveyed by word of mouth. This method of announcing jobs is done in large part to affect the pool of potential candidates. Hiring is still based largely on familial relationships, ethnic affiliations or business arrangements. Despite a basic ability to operate within letter of the law, the adulteration of HR processes and procedures remain a leadership challenge.

The *Administration and Finance* Department operates with significant oversight within the organization. Still, spending is not projected on an annual basis and is generally completed in an ad hoc fashion. As an example, in the last fiscal year the HOO purchased tens of thousands of dollars of high quality office equipment; however, at the end of the last fiscal year (ending in March) the HOO was without funds to pay employees for two months. In the HOO, there is no functional line item budget and no application of generally accepted accounting principles¹⁵. Also, within the Department, issues of professional responsibility remain a leadership challenge; despite excellent command and control from the Deputy Director General.

The *Asset Registration Department* has grown considerably over the last two years and is operating close to an acceptable standard. The Department is not immune from political interference and there are reporting lapses and systematic weaknesses; overall, however,

¹⁵ Out of necessity, a rudimentary projection budget was produced after the allocation of funds from the Ministry of Finance.

it has improved considerably in the last 18 months. The Department has established workshops, discussion materials and forms which are available to every person required to file via internet¹⁶. A functioning asset declaration and review process is operating and the Department has collected declaration forms from nearly two-thirds of those required to file. Unfortunately, systematic and internal control weaknesses are evident when discrepancies are discovered; however, those are leadership issues outside of the Department. The Department still collects and processes all forms in a non-electronic environment which is manpower intensive and an additional vulnerability.

The *Strategy and Planning* Department benefits from a strong relationship with many international organizations and is motivated to succeed. However, Department personnel have little professional understanding of strategic development and planning. Projections are based largely upon conjecture without generation of integrated line-item budgets, manning documents, or equipment projections. There has been international assistance in Strategy and Planning which has produced some tangible results; but with the challenges of the HOO, the improvements are subsumed within the organization.

The *Case Tracking & Oversight* Department is a primary focus of Dr. Lodin and is very attentive to his authority. It is operated in a very traditional manner and, despite a large number of employees, has only two or three experienced investigators. The Department is largely ineffective because of the lack of technical experience and, more importantly, challenges in professional responsibility within the Department. While evidence-based complaints are always investigated and eventually transferred to Anti-Corruption Unit (ACU) within the Attorney General's Office. They are often accompanied by an informal recommendation from the Case Tracking Department to affiliated colleagues at the ACU concerning how the case should be handled. Within the last year the Case Tracking Department completed more than 140 investigations of high-level government officials. No charges have been filed on any of the cases as of the writing of this report.

¹⁶ <http://anti-corruption.gov.af/en/page/1750>

The *Prevention Department* is intended to be instrumental in facilitating anti-corruption initiatives within the Ministries of Afghanistan through the simplification process. The Prevention Department is also responsible for public awareness and advocacy. Based upon observation and experience, the Department Director is well-intentioned and not involved in corruption. The Director, like most Afghans, received an informal education. He was awarded a degree and the title of “Judge” from an Islamic religious order. However, a provincial approach to corruption has left the Prevention Department almost completely ineffective against institutionalized, administrative corruption. Organizational structures, business process management, systems controls and control hierarchies are too complex for the Department and, consequently, they are unable to complete the mission of simplification to which they have been assigned.

When the HOO was first authorized, the *Complaints Department* was one of its early successes. However, with changes in management the Department was unable to sustain its early achievements and subsequently fell into the political quagmire that haunts the HOO. While the Department does receive and process virtually every complaint it receives, lapses in process and systematic failures contribute to the growing exploitation of vulnerabilities. The current Director is a youthful, well educated man of Pashtun decent who is very attentive to the wishes of Dr. Lodin. He is relatively new in his position, having been promoted by Dr. Lodin from a Grade 4 to a Grade 2.

The *Internal Audit Department* is headed by the only female director in the High Office of Oversight. It is also the only department that reports directly to the Dr. Lodin. As is the case with all ministerial internal audit offices, the department also must report to the Control and Audit Office (CAO). The Department operates in an officious manner, generating reports and following the guidance of Dr. Lodin. The Department cannot initiate independent investigations without the formal consent of Dr. Lodin and the informal consent of the two Deputies—so, in many instances the Department is hamstrung. The Department leadership is honest but is too acquiescent and bound by authority to be effective. Also, there are internal control weaknesses (e.g., informal consent requirements) which hamper oversight.

4. Recommendations for HOO Development

A. Develop a National Anti-Corruption Policy –

Before continuing or commencing any anti-corruption program, the HOO should facilitate the adoption of a national anti-corruption policy and strategy. This necessarily includes creation of a comprehensive sub-national policy and strategy. There are several policy considerations that must be addressed during the formative phase. For example, the policy should identify whether the anti-corruption agency reports to the president, the parliament, or the judiciary. The policy should also present a vision for anti-corruption activities at the sub-national level (i.e. provincial and municipal). Additionally, the policy should describe agency responsibilities and include a vision of how different agencies will interact. The strategy, which overarches the various agencies, should identify whether Afghanistan wants to adopt an enforcement-led strategy, a prevention-led strategy, or an intelligence-led strategy.

B. Develop Comprehensive Anti-Corruption Legislation

The HOO should facilitate the development and implementation of comprehensive anti-corruption legislation. This legislation should include both authorizing legislation, as well as enabling legislation. The legislation should reflect the national policy, and should ensure compliance with UNCAC to which Afghanistan is a signatory state.

C. Develop Institutional Anti-Corruption Strategy

The development of an implementation strategy for the HOO is imperative. This broad-based strategy will outline the priorities of the HOO in accordance with the national policy and in accordance with its legal authorities. The strategy should incorporate organizational vision; mission and values. Additionally, it should define the approach the HOO will employ to achieve clearly identified goals, objectives, and targets; and how it will allocate its resources to achieve those goals.

D. Develop Institutional Capacity Development Plan for the HOO

The fourth recommendation is the creation of an institutional capacity development plan for the HOO and all of its departments and units. After the policies, laws, and strategies have been clearly articulated, the HOO must re-organize itself to focus on core mission requirements. Re-organization however, only allocates resources. It does not build capacity. Therefore, an organization-wide effort to increase the HOO's capacity and effectiveness must be undertaken. This effort must be careful to delineate between Institutional Development, Technical Assistance, and Infrastructure Development. This phase of the operation is primarily focused on institutional development, and; therefore, takes precedence over, Technical Assistance and Infrastructure Development for the time being.

This development plan should:

- Briefly describe the specific duties, responsibilities, and functional interoperability of the unit and develop a unit mission statement
- Consider the unit's placement within the existing organizational diagram
- Develop a proposed organizational wire diagram for the unit
- Develop a proposed staffing table and staff gap analysis for the unit
- Develop a proposed staffing budget (based upon Tashkil grades)
- Develop a training plan for each position
- Develop a training budget for each position and for the unit
- Develop a travel budget for the unit
- Develop a Gantt chart to identify when the unit becomes operationally functional
- Identify equipment requirements for each position and for the unit
- Develop an equipment budget for each position and for the unit

The unit development plan should be careful to include functional interoperability, battle rhythm, process development, and standard operating procedures. For operational success, each unit must be technically and functionally competent.

E. Implement Capacity Development Plan

The fifth recommendation is the implementation of the re-organization and capacity development plan created above. This recommendation is critical to the immediate operational success of anti-corruption initiatives in Afghanistan. If done correctly, results

will be readily apparent. It is imperative that strong international guidance be provided to each unit during the implementation process. Top-level support is also crucial to ensure implementation in accordance with mission intent. Based upon the unit development plan above, in this phase of the operation the HOO must:

- a. Develop a three-year operations outline
- b. Develop unified staffing tables & complete staff gap analysis
- c. Develop a unified procurement plan and complete procurement gap analysis
- d. Develop a unified three-year training plan
- e. Develop a three-year strategic communications plan
- f. Develop a consolidated three-year budget
- g. Develop “stop-gap” plan
- h. Develop a succession plan

F. Facilitate Community-led, Non-Governmental Anti-Corruption Programs

After the 2014 withdrawal of international forces, the sphere of influence wielded by the central government will certainly diminish. It is conceivable that the government will only control select regions of the country. Other, more rural areas, may be tacitly ceded to the Taliban. To be successful with these political uncertainties requires that future anti-corruption initiatives in Afghanistan be two-pronged: one focused on developing a comprehensive framework within the central government (centered around the HOO); and, a second, equally robust one, focused on community-led, sub-national programs that are not affiliated with the government. Therefore, it is recommended that the HOO acquiesce and cooperate in the development of community-led, non-governmental initiatives at the sub-national level.

G. Publish and Implement a Zero Tolerance to Corruption Policy

As an absolute imperative, the HOO must publish and implement a zero-tolerance policy toward corruption and the appearance of impropriety immediately.