In the Fog of War: Ukraine's Fight Against Corruption in the Midst of Russia's Invasion

Larry Cooley, Phyllis Dininio, Eka Tkeshelashvili, Ellen Yount

Two years ago, many Americans could not have located Ukraine on a map. Today, names and images of small Ukrainian towns, progress and setbacks on the battlefield, and personal stories of displaced and devastated Ukrainian families are featured daily across newspapers, podcasts, social media, and televisions across America. Beside them are the dramatic stories of resilience and bravery by countless Ukrainians, providing glimmers of hope to a global audience.

Alongside the military battles, Ukraine continues to wage a less visible battle—a battle against corruption, which dates to the 2014 Revolution of Dignity. Like everything else in Ukraine, that conflict has been forced to adapt to radically and constantly evolving and uncertain circumstances. While it might be tempting to shelve this quiet battle for another day, Ukraine—with the support of the U.S. Agency for International Development (USAID)—has doubled down on this fight as well.

This article—written from the perspective of experts at MSI, A Tetra Tech Company, and USAID's implementing partner for supporting anti-corruption efforts in Ukraine for [more than 25 years](1)[1]—explores why and how they have decided to do this despite uncertainty about the war and how the country will be rebuilt. It is written from Tetra Tech's perspective as a third party working to support a range of Ukrainian anti-corruption organizations under the auspices of the USAID-funded project, [Support to Anti-Corruption Champion Institutions](2)[2] (SACCI).

The Role of Anti-Corruption in Ukraine Before, During and After the War

Ukraine's fight against corruption, and international donor support for that effort, started well before the current conflict. It began against a backdrop of longstanding and pervasive corruption that placed the country near the bottom of virtually every index. Despite these considerable efforts and some notable progress prior to the war, Ukraine was still ranked as Europe's third most corrupt country by [Transparency International](3)[3].

When Russia invaded Ukraine in February of 2022, both the Ukrainian and the U.S. governments quickly recognized that unprecedented quantities of military and humanitarian aid were likely to flow into the country from a variety of official and less official sources for an indeterminant period, and that this would likely be followed by a lengthy period of reconstruction.

1 https://www.thinglink.com/scene/1050024436536705027

2 https://www.msiworldwide.com/projects/preserving-gains-against-corruption-ukraine-during-wartime

3 https://www.transparency.org/en/cpi/2021

They also understood that proper management of these funds would, at some point, shape the willingness of these and other partners—including donors, international development institutions, and the private sector—to support Ukraine financially[4]. And both governments realized that any practices they instituted needed to be adapted to a context where nothing was predictable, discretion at the field level was essential, and excess bureaucracy was a luxury they could not afford.

When war broke out, USAID's decision to expand rather than curtail its support for Ukraine's fight against corruption reflected an understanding by USAID's leadership of these realities and the need for anti-corruption efforts to occupy a prominent position alongside other USAID priorities, including the provision of housing and helping Ukraine to meet its energy needs in the face of Russia's attacks on numerous energy grids.

Since 2017, the USAID SACCI team has worked closely with government agencies including the National Agency for the Prevention of Corruption (NACP), the Anti-Corruption Policy Committee of the Parliament, the Ministry of Health, and the State Property Fund of Ukraine; and with civil society organizations, including Transparency International Ukraine, the Association of Legal Clinics of Ukraine, White Collar Hundred (WCH), and Slidtstvo. With a strong team of Ukrainian and regional experts in place, and an established foundation of trust with these organizations and with USAID, SACCI provided atypical levels of flexibility to pivot, and pivot again, as needed to meet new and emerging needs amidst the war.

This foundation of trust-based relationships allowed USAID and Tetra Tech to amend civil society organizations' (CSO) scope agreements quickly to incorporate new functions such as:

- Helping document damage to civilian objects;
- Collecting stories of impact of the Russian invasion on civilians; and
- Communicating about developments on the ground.

It also permitted the NACP to redirect attention to providing access to databases for:

- Tracing assets of individuals connected to the war effort;
- Assessing corruption risks in the delivery of humanitarian aid; and
- Providing corruption risk mitigation recommendations.

By late March, Ukrainian anti-corruption agencies and champions had begun to find their place in this new context. They focused on enhancing accountability in the delivery of humanitarian aid, as well as developing practical measures to augment anti-corruption procedures that were, of necessity, loosened in the war's earliest days. Building on relationships established through prior engagement with capable and trusted Ukrainian partners, USAID and Tetra Tech were able to make these changes with unusual pace and flexibility even when obliged to work remotely from the United States, Poland, and Georgia. This took place despite the fact that Ukrainian team members, like others in the country, were enduring unexpected missile attacks, energy and food shortages, and the daily emotional and mental distresses of displaced colleagues, friends, and families.

In addition to the development and implementation of systemic safeguards, Ukrainian and USAID officials and the SACCI team identified the need to bolster rather than walk away from the array of civil society organizations and protections that had been a focal point for anti-corruption efforts prior to the war. Specific activities focused on ensuring the continuity of key organizations and initiatives, including Transparency International Ukraine, the Institute of Applied Humanitarian Research (IAHR), and the Association of Legal Clinics. While investigative journalism moved its primary focus to documenting war crimes and damage to civilian targets, and whistleblower activities shifted to focus on war-related issues, both continued to receive active support from the project.

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[4] From a U.S. perspective, we already begin to see these debates unfolding in the U.S. Congress – and in some cases, becoming the subject of campaign debates.

For example, in addition to its anti-corruption investigations, the WCH NGO, supported by SACCI, began documenting the war's toll on civilians and civilian infrastructure. SACCI also extended its grant to Slidstvo.info for investigative journalism to incorporate reporting from the frontline on local efforts to unite communities and help people in wartime.

In addition to supporting these strategic shifts, USAID encouraged SACCI to help counterparts manage a variety of time-sensitive, essential administrative tasks such as securing databases and essential registries. This included the NACP's registry of income/asset declarations of public officials, political parties' financing reports, and the registry of corrupt officials. We helped these organizations store this critical data in the cloud, and then make it operational so that staff could continue to work with the data and registries. USAID also authorized us to support other practical accommodations, which included securing data on servers, ensuring redundancy, and enabling Ukrainian staff to work remotely. And when the IAHR office in Kharkiv was destroyed, SACCI purchased laptops, Wi-Fi routers, and SSD devices for the organization.

Even amidst the continuing destruction, many in Ukraine have begun to plan for the massive rebuilding effort that lies ahead and to anticipate the country's eventual entry into the EU. A recent editorial in the Washington Post[5] stated the proposition in stark terms:

> *...the reconstruction of Ukraine will depend on more than cash and concrete, although heroic amounts of both are needed. Ultimately its fate will turn on a transformation of mind-set and governance in a nation notorious for oligarchs and endemic corruption. Even before the shooting stops, the country must launch a durable, ironclad, transparent project to transform ministries, markets, courts, businesses and institutions, raising them to Western democratic and free-market standards.*

Discussions are well underway on approaches to coordinating and managing financial support through a special Trust Fund and a Ukrainian Marshall Plan. Ukraine presented its own vision for rebuilding at the Ukraine Recovery Conference held in Lugano, Switzerland in July of this year. In mid-October, top Ukrainian and international officials took part in the G7's International Expert Conference on Recovery, Reconstruction and Modernization of Ukraine, hosted in Berlin, Germany. Donors and international development institutions at the Berlin conference reaffirmed that they are united in their commitment to Ukraine's victory and short- and long-term recovery needs, including ensuring accountability and transparency.

Echoing this sentiment, a recent Brookings blog by Josh Rudolph and Norman Eisen framed the issues this way[6]:

> *Given how valiantly Ukrainians are defending the front lines of the free world, a morally and politically difficult job will fall to the leaders of the United States and the European Union: They will have to insist on sending Ukraine hundreds of billions of dollars for recovery and reconstruction only if the aid architecture and reform agenda aggressively prioritize anti-corruption. Protecting aid money from corruption and pressing forward with reform in Kyiv is essential for Ukrainian sovereignty, the country's EU accession, and the integrity of Western tax dollars. Strong anti-corruption commitments and performance are key to Ukraine emerging from this devastating war with a modern democracy and fair economy worthy of such historic sacrifice.*

In recognition of these realities, USAID prioritized SACCI support to the Government of Ukraine in embedding efforts to limit corrupt and promote transparency into emerging reconstruction plans. And when prominent Ukrainian CSOs united into an informal coalition called RISE Ukraine to support the recovery of Ukraine and ensure its transparency and accountability, SACCI was given the green light to support members of that coalition and to support the operations of the coalition.

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[5] Build Ukraine back better, Washington Post, October 21, 2022; page A22.

[6] Ukrainian reconstruction funding must be tied to anti-corruption, Josh Rudolph and Norman Eisen, The Brookings Institution, October 24, 2022.

Emerging Lessons for Ukraine and Beyond

Russia's war against Ukraine and its people is unique in several ways, but we believe there are lessons to be learned for anti-corruption programming in other conflict settings, including:

1. The temptation to subordinate or defer anti-corruption efforts can and should be resisted lest perceived abuses directly undermine medium-term support for the war effort and subsequent reconstruction.

2. Safeguards need to focus on wartime priorities and can be designed in ways that do not impede or delay essential action.

3. Donor support for instituting anti-corruption safeguards during active conflict is more feasible where prior investments have established strong local institutions and strong interpersonal relationships.

4. Civil society activities focused on transparency and accountability are essential complements to government action.

5. Enhanced flexibility and delegation of authority are indispensable and require both active support from donor agency leaders and trusted local teams.

As the life and death struggle for the sovereignty and future of Ukraine continues, these efforts to fight corruption represent a second, less visible, battlefront in the fight for Ukraine's future. As a longtime partner of USAID/Ukraine and of Ukraine's anti-corruption champions, Tetra Tech is committed to remaining on the frontlines.

About the Authors

Larry Cooley is the Founder and President Emeritus of MSI, A Tetra Tech Company. He is an elected Fellow and board member of the US National Academy of Public Administration and prior chair of its Standing Panel on International Affairs, and he serves as current Board Chair of the Society for International Development and of World Learning.

Phyllis Dininio is the Chief of Party for the Countering Transnational Corruption Grand Challenge funded by USAID and has led anti-corruption efforts at MSI, A Tetra Tech Company, USAID, the State Department, and the World Bank.

Eka Tkeshelashvili is the Chief of Party for the USAID-funded Support to Anti-Corruption Champion Institutions project and is an active member of the Advisory Committee on Voluntary Foreign Aid (ACVFA). Eka also led the EU Anti-Corruption Initiative in Ukraine and was the Former Minister of Justice, Foreign Affairs and Prosecutor General of Georgia.

Ellen Yount is a Vice President with MSI, A Tetra Tech Company, currently based in Warsaw, Poland to coordinate Tetra Tech's contributions to Ukraine reconstruction and recovery.

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