



On Nigeria

2019 Evaluation and Learning Synthesis Report – For Public Use



MacArthur
Foundation

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ACRONYMS AND ABBREVIATIONS

ACJ	Administration of criminal justice (law)
ACJA	Administration of Criminal Justice Act
CLE	Continuing Legal Education
CSO	Civil society organization
DISCO	Electricity distribution company
EFCC	Economic and Financial Crimes Commission
FCCPC	Federal Competition and Consumer Protection Commission
GenCO	Electricity generation company
HGSF	Home Grown School Feeding Program
LGA	Local government area
NERC	Nigerian Electricity Regulatory Committee
OCDS	Open contracting data standard
PACAC	Presidential Advisory Committee Against Corruption
SBMC	School-based monitoring committee
SUBEB	State Universal Basic Education Board
UBEC	Universal Basic Education Commission

EXECUTIVE SUMMARY

Since 2015, the MacArthur Foundation’s On Nigeria strategy has sought to reduce corruption by supporting Nigerian-led efforts that strengthen accountability, transparency, and participation. Its theory of change builds on Jonathan Fox’s “sandwich theory,” which leverages the interplay between a push from below, by which citizens demand change (“voice”), and a squeeze from above to encourage public and private institutions to develop and enforce laws and regulations (“teeth”).

As of January 2020, the On Nigeria strategy has made 138 grants (totaling \$66.8 million) that are a proving ground to develop and test a range of tactics and entry points for addressing corruption. Corruption is complex and ever-evolving, and progress toward the goal of reducing it will most certainly not be linear nor simple. Thus, On Nigeria reflects a multilayered strategy, comprising five areas of targeted programming, or modules—the Home Grown School Feeding (HGSF) Program, the Universal Basic Education Commission (UBEC) Intervention Fund, Electricity Distribution, Criminal Justice, and Media and Journalism; and three cross-cutting areas—behavior and social norm change, civil society pressure for government accountability, and election-related efforts.

The goal of this paper is to provide the latest information from the ongoing evaluation of On Nigeria, facilitate learning, and serve as one input to determine the next stage of programming. The evidence presented explores the strategy’s progress to date, the validity of its theory of change, and status of windows of opportunity in the strategy’s landscape.

What Are We Learning?

Evidence on the strategy’s progress to date shows:

- **On Nigeria tactics to leverage and increase civil society and media “voice” actors’ efforts have demonstrated “proof of concept” and results.** Across all On Nigeria modules and cross-cutting areas, “voice” actors have played an increasingly visible role in demanding accountability, advocating for reforms, engaging citizens in anticorruption issues, monitoring public projects and legal compliance, and publishing more reporting on corruption and anticorruption issues (with some improvement in investigative reporting quality). This increased pressure has contributed to a number of responses from “teeth” actors in all five modules, particularly in the HGSF and Criminal Justice.
- **On Nigeria’s efforts have strengthened the policy framework at the federal and state levels, bolstering emerging corruption response mechanisms, and demonstrating substantial momentum toward legal and regulatory outcomes.** The Government of Nigeria continues to make progress on its anticorruption agenda through adoption of laws and policies, while the federal Administration of Criminal Justice Act (ACJA) and state-level adoption of Administration of Criminal Justice laws has improved the legal framework that underpins the criminal justice sector’s ability to respond to corrupt acts. Meanwhile, nascent government corruption response systems in education programs (HGSF and UBEC) and by the Nigerian Electricity Regulatory Commission (NERC), particularly the use of sanctioning, have strengthened “teeth” in On Nigeria’s target sectors. This progress in policy reform has

enjoyed support from champions at the federal level and in some states, but overall implementation has been slower at the state level and within electricity distribution companies (DISCOs). Transparency and prevention systems tend to be more idiosyncratic in each module, with the most promising systems tailored to each module's most prevalent corruption risks.

- **On Nigeria's cohort model has strengthened collaboration among grantees within modules and cross-cutting areas for effective harmonization of activities and tools, leveraging of complementary roles, and sharing of lessons learned.** The MacArthur Foundation's regular convening and support of grantee cohorts has facilitated progress in cross-grantee collaboration. However, there remains untapped grantee collaboration potential *across* cohorts and *across* different categories of actors (civil society, media, and government). Collaboration between civil society and the media is growing in areas where the MacArthur Foundation works directly.
- **On Nigeria's efforts have increased capacity for anticorruption work across sectors and systems.** The MacArthur Foundation's support to grantee anticorruption-related skill building has strengthened grantees, and grantees talk about anticorruption work with a higher degree of sophistication than 3 years ago. Grantees have focused a significant amount of their efforts within the modules on building the skills of community, legal, and media actors. This area of skill building is hard to summarize because skills are specific to the individual modules, but the increase in "voice" actions and momentum toward "teeth" outcomes indicate an improvement in the overall capacity.
- **There is a clear line of sight to long-term outcomes and impacts for the Criminal Justice module; a potential line of sight for the HGSF, Media and Journalism, and the strategy overall; and still an inadequate line of sight for the UBEC and Electricity modules.** Many of the short-term milestones the On Nigeria team identified as important to demonstrating the viability of the strategy in the long term have been reached, particularly for Criminal Justice, Media and Journalism, and the HGSF modules. The Electricity and the UBEC modules have had less success in achieving their milestones. Grantmaking for most cross-cutting areas of the strategy was initiated only in 2018, so these areas are still too early in implementation to adequately assess progress or line of sight.

Findings about the validity of On Nigeria's theory of change show:

- **The strength of the theory of change is its multifaceted nature, which aligns to the multidimensional nature of corruption.** Evidence indicates that On Nigeria's theory of change—based on its articulation of the sandwich theory—is a valid approach for confronting corruption in Nigeria, joining the push from below ("voice") with the squeeze from above ("teeth"). Sustainable long-term change will depend on the interplay of "voice" and "teeth," and signs of this change have emerged in the HGSF, UBEC, and Media and Journalism modules. However, much of the progress to date has been focused in either the "voice" or "teeth" sides of the sandwich. The theory of change itself has gaps in the areas of spread

needed for change at a larger scale, the role of norms for those who work *in* the system, and the link between anticorruption work and better governance.

Information collected on the status of windows of opportunity in the strategy’s landscape shows:

- **The window of opportunity is still open—and perhaps even more open for MacArthur Foundation’s investment.** The On Nigeria strategy has effectively leveraged the opportunity opened by the Buhari administration’s taking office in 2015, along with the existence of Nigeria’s robust civil society and diverse media landscape, the implementation of a new program (HGSF) to “bake in” transparency, the privatization of the electricity sector, and the passage of the federal ACJA. On Nigeria has contributed to and can leverage a growing coalition of anticorruption reformers that spans multiple types of actors: government, civil society, and the media.
- **There has been some evolution in the landscape since 2015, and evidence suggests new risks to the windows of opportunity in the future.** Two primary risks are already evident: (1) government efforts to close the civil society and media space could impede “voice” actors’ and grantees’ ability to act; and (2) the 2023 elections, with their inherent political maneuvering, will influence government and other actors, and a new administration could be hostile to the anticorruption agenda. If the coalition of anticorruption reformers continues to grow, the window for effecting change could open even wider, with additional partners to work with. On the other hand, if the government pursues actions that further tighten the civil society and media spaces, the window of opportunity could close rapidly.

Conclusions

The evaluation of On Nigeria to date highlights some important learning for future consideration:

- **The On Nigeria program has contributed to increased accountability and transparency in several targeted geographies, sectors, and systems, and most windows of opportunity remain open.** Our analysis suggests traction and momentum for a range of tactics and entry points, indicating a *potential* for a line of sight to national, strategy-level impact. The pathway to impact and the success of the strategy will require sustainability of current gains, and spread to other geographical and programming areas. The windows of opportunity remain open for continued investment in most modules and the strategy overall, but potential new risks have emerged to the civil society and media space.
- **The On Nigeria theory of change is largely valid, but gaps remain for fully achieving the strategy’s overall goals.** The On Nigeria strategy’s most important gap to date is a lack of articulation of how the modules and cross-cutting areas should complement each other and contribute to the ultimate goal of reducing corruption in Nigeria. On Nigeria has successfully demonstrated models for community engagement (“voice”) activities, but in their current form, these models are too intensive to achieve spread; there is a need for new models and tactics that can translate engagement from a target sector to all sectors, and from target geographies to the national level.

- **Adjusting the theory of change to address inconsistencies and gaps before new grantmaking occurs will enable On Nigeria to fully align grantmaking with the strategy.** Inconsistencies and gaps in its current form call for greater alignment of strategy, tactics, and desired outcomes with the overall goal, before the next period of work begins. Theories of change of modules that continue in the next phase of the strategy merit adjustments to strengthen the sandwich theory’s “voice” and “teeth” dynamics and leverage successes. Cross-cutting areas (behavior and social norm change, civil society pressure for accountability, and election-related efforts) are currently without fully articulated theories of change. Given that cross-cutting grants represent almost half of the overall On Nigeria grant funds, any areas continuing into the next phase should have full theories of change developed to enable effective programming, as well as assessment of progress and line of sight to impact. Additional theory of change adjustments include: (1) building in more explicit pathways and tactics for spread and institutionalization; (2) addressing the behavioral norms of those who work within the system; and (3) articulating the interplay of this anticorruption work with Nigeria’s broader evolution toward good governance, in particular the strength of electoral institutions and rule of law.
- **As On Nigeria continues with its design-build process related to spread and behavior change, there are still unknowns and unanswered questions, and the windows of opportunity will require continuous monitoring.** One of the most important questions, now that On Nigeria has demonstrated initial traction, is how best to expand and institutionalize the “voice” and “teeth” efforts of its first phase. Questions relate to the breadth and depth of behavior-change work needed to influence social norms, particularly because there is still limited evidence available on progress in citizens’ norms and behaviors related to corruption and accountability—demanding services, being intolerant of corruption, and not engaging in corruption—or their perceptions of anticorruption wins. The windows of opportunity need continued monitoring to ensure appropriate recalibration and adaptation of the strategy to changes in the context, including the evolution of Nigeria’s accountability ecosystem—that important web of relationships among “voice” and “teeth” actors that influence participation and transparency.
- **In this pause-and-reflect moment represented by the strategy review, the evaluation and learning evidence to date points to the need for some recalibration of the current strategy.** There is sufficient progress toward the initial milestones to suggest On Nigeria has traction, but also enough challenges to indicate that the strategy’s current articulation is not sufficient to show the line of sight to its ultimate goal. Coming after two rounds of evaluation data collection (2018 and 2019) and an average of 3 years of implementation experience, such a recalibration is well timed to take advantage of substantial learning from experience and evidence. On Nigeria has achieved initial progress in an area of high priority for Nigerians, but that progress is still fragile and could easily be lost. With a longer term commitment, On Nigeria could consolidate its early gains to alter Nigeria’s trajectory toward sustainably reducing corruption.

INTRODUCTION

This paper summarizes evaluation and learning evidence gathered through 2019 for the John D. and Catherine T. MacArthur Foundation’s Big Bet On Nigeria. The evidence explores progress to date, as well as changes in the landscape On Nigeria operates in (i.e., assumptions underpinning the strategy’s theory of change, the status of windows of opportunity, the relevance of chosen entry points for the MacArthur Foundation’s efforts, and other relevant contextual factors). The goal of this paper is to provide the latest information available to inform the MacArthur Foundation’s ongoing learning and decision making about the strategy.

This paper sets out to answer three overarching questions:

1. Does progress to date demonstrate momentum and provide a line of sight to significant, meaningful, and sustainable long-term outcomes and impact?
2. Is the theory of change valid and adequate to reach the intended impacts?
3. Does the landscape suggest continued windows of opportunity for progress toward On Nigeria’s intended outcomes and impacts?

This paper provides a high-level synthesis of information to answer these questions in the *What We Are Learning* section, which is supported by the visual evidence available in **Annex 1**. Before addressing these questions, this *Introduction* reviews the On Nigeria theory of change and the strategy’s implementation to date. The *Overview of On Nigeria’s Evaluation and Learning Framework* outlines the evaluation design, sources of evidence underlying the responses to these questions, and their methodology. The paper closes with *Learning and Conclusion*.

On Nigeria and Its Theory of Change

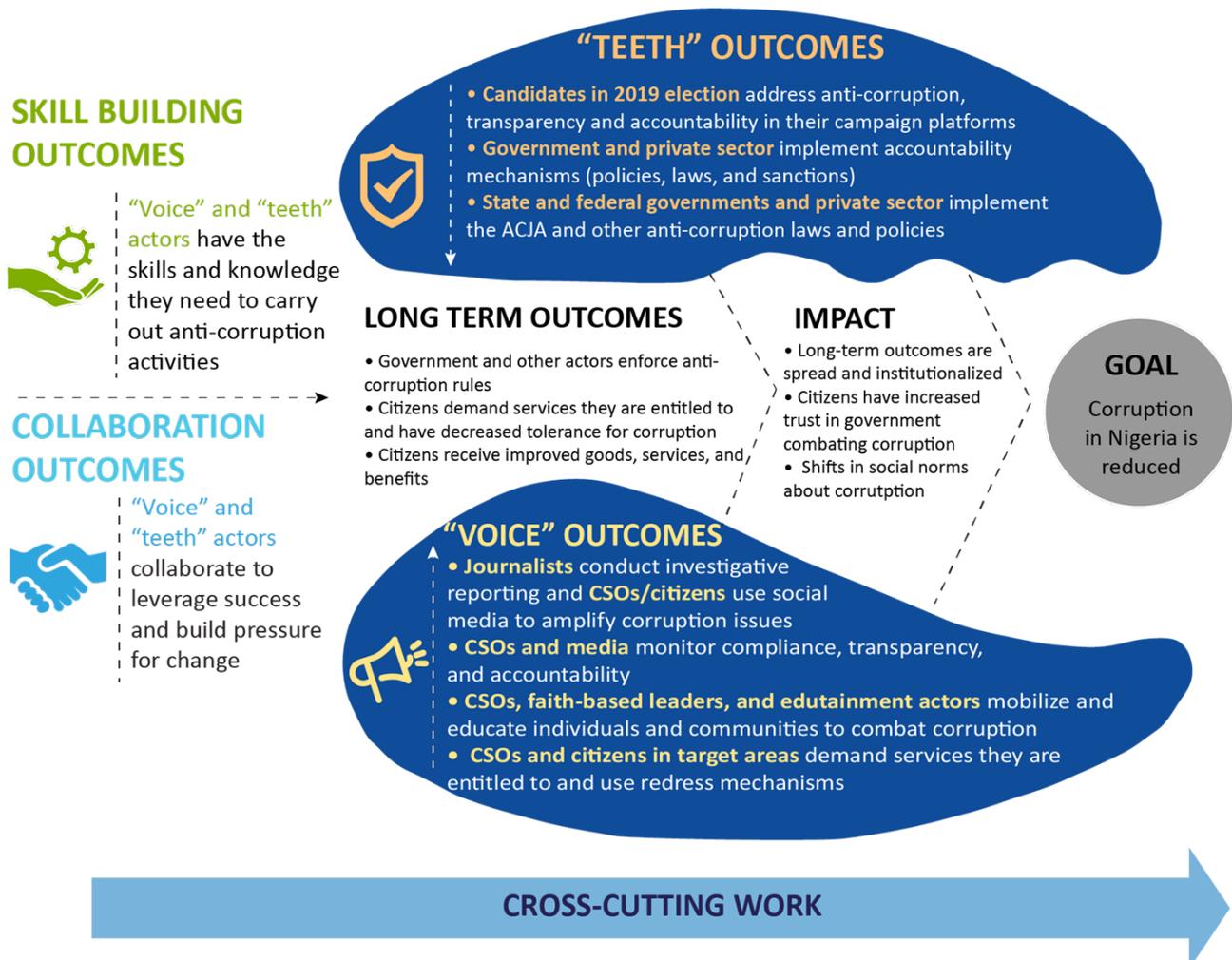
Since 2015, the MacArthur Foundation’s On Nigeria has invested in endeavors to reduce corruption in Nigeria by supporting Nigerian-led efforts that strengthen accountability, transparency, and participation.

Corruption, impunity, and lack of accountability in Nigeria have far-reaching impacts on access to and quality of public services, the well-being of Nigerians, and overall development. The On Nigeria strategy builds on Jonathan Fox’s “sandwich theory,”¹ which recognizes the interplay between a push from below and a squeeze from above to effect change and counteract resistance from vested interest. The push from below is the “voice,” which represents citizens’ actions to demand change and develop local solutions to combatting corruption. The squeeze from above is the “teeth,” which represents the efforts of government and other high-level actors to develop and enforce laws and regulations, including implementing systems for transparency, monitoring compliance, and using incentives to discourage corruption and sanctions to punish it. The On Nigeria theory of change harnesses the “voice” of Nigerian citizens and the “teeth” of Nigerian public and private institutions, and combined with skill building and collaboration approaches for “voice” and “teeth” actors, intends

¹ Fox, J. 2015. *Social Accountability: What Does the Evidence Really Say?* World Development 72 (August): 346-361.

to address the problem of corruption in Nigeria. **Exhibit 1** summarizes the theory of change and these four complementary approaches to achieving long-term outcomes and impact. See **Annex 2** for the full theory of change graphics for the strategy and each module, listing all outcomes, impacts, and associated measures. Note that cross-cutting areas are currently represented at the strategy level of the theory of change.

Exhibit 1: On Nigeria’s theory of change



Corruption is complex and ever-evolving, and progress toward the goal of reducing it will most certainly not be linear. Thus, On Nigeria reflects a multilayered strategy, including five specific areas of programming (modules) and several cross-cutting activities. Three modules operate in two exemplar sectors—**Education** (Universal Basic Education Commission [UBEC] Intervention Fund and the National Home Grown School Feeding Program [HGSF]) and **Electricity** (electricity distribution)—to demonstrate results of strengthened transparency and accountability in ways citizens can see and feel in their daily lives through an improved flow of services. These sectoral modules focus on targeted geographies to demonstrate what can be accomplished and inform the design of future work. Two additional modules address systems-level areas: **Criminal Justice** to strengthen the system’s legislative framework and its corruption response, and **Media and Journalism** to investigate corruption and amplify anticorruption efforts. Finally, a series of **cross-**

cutting activities build on and complement the modules. These cross-cutting activities are grouped into three categories: (1) behavior and social norm change activities by entertainment and faith-based organizations, (2) civil society organizations' (CSOs') work to build pressure for accountability, and (3) elections-related efforts.

Both globally and in Nigeria, reducing corruption has no single proven pathway—each country that developed control of corruption took its own path to get there. Other countries and prior work in Nigeria provided examples of anticorruption initiatives the MacArthur Foundation could draw from, but also indicated that no single approach would address it and any endeavor would need to be context specific. On Nigeria, in its first 3 years, is a proving ground to develop and test a range of tactics and entry points, which reflects the MacArthur Foundation's design-build approach. While its ultimate goal aspires to contribute to lasting change at the national level, this initial period of work has sought to understand whether, how, and under what circumstances the MacArthur Foundation might be able to add value and contribute to progress in support of that goal.

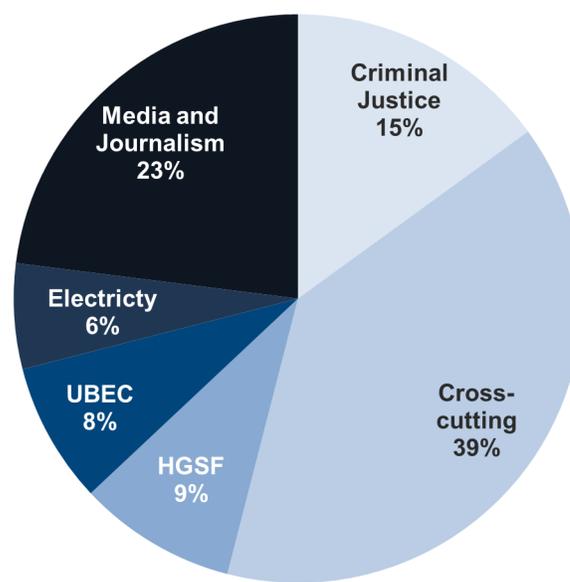
Overview of On Nigeria's Implementation

The On Nigeria portfolio contains 138 approved grants that total \$66.8 million, as of January 2020.² While the first grant began funded activities in June 2015, the Board endorsed the full strategy in September 2016. All five modules had launched by September 2017, and the majority of grants began funded activities by January 2018, including in many but not all cross-cutting areas. Consequently, the amount of time available to achieve progress across modules and cross-cutting areas varies. As of January 2020, \$48 million of the approved funding had been disbursed to grantees (72 percent); as of October 2019, grantees reported spending approximately \$20.5 million (31 percent) of the approved funds. On Nigeria's 138 grants have been made to 96 organizations, two-thirds of which were first-time MacArthur Foundation grantees. Just over three-quarters of the grants (106), which represent 82 percent of awarded funds, have been made to Nigeria-based organizations.

² On Nigeria Strategy Review Appendix – On Nigeria grants data, January 17, 2020 (PowerPoint).

As shown in **Exhibit 2**, 39 percent of the funds awarded are dedicated to cross-cutting grants, followed by Media and Journalism (23 percent), Criminal Justice (15 percent), HGSF (9 percent), UBEC (8 percent), and Electricity (6 percent). Sixty-five (65) percent of granting is dedicated to “voice” activities as the primary approach, followed by “teeth” activities (26 percent), skill-building activities (9 percent), and collaboration activities (1 percent). Almost all grants entail multiple approaches, and factoring these in, 73 percent of grants include collaboration activities. **Annex 3** provides additional detail on grants.

Exhibit 2: Funding by module (cumulative)



Through On Nigeria, the MacArthur Foundation also conducts non-grantmaking activities, including financial and technical support to grantees, as well as On Nigeria team members’ broad engagement in the Nigerian anticorruption field. These non-grantmaking activities include technical assistance opportunities for grantees to build monitoring and evaluation skills,³ training in communication and behavior change methods by experienced practitioners, and the MacArthur Foundation staff’s support and mentorship in proposal development and grant management. One of the key non-grantmaking approaches is fostering collaboration among grantees by using the “cohort approach,” whereby grantees within each of the five modules and three cross-cutting areas regularly convene to share knowledge and coordinate efforts for greater effect.⁴ Finally, the MacArthur Foundation carries out activities to foster collaboration with other donors and stakeholders in the anticorruption space; independently raise the profile of transparency, accountability, and corruption issues (“voice”); and advocate to government and private-sector actors for further “teeth” measures.⁵

³ The MacArthur Foundation offers external technical assistance to grantees for developing theories of change and monitoring and evaluation plans through a separate contract with EnCompass.

⁴ The cohort approach has evolved over On Nigeria’s 3 years of implementation. Key aspects of the approach are that each cohort of grantees: (1) writes their proposals at the same time; (2) meets at the outset to define a goal and theory of change grounded in On Nigeria’s goal and theory of change, but independent of the On Nigeria module theory of change; (3) receives their funding around the same time; and (4) agrees to share information and tools, and collaborate over the life of the project. There are currently eight cohorts, which meet quarterly: HGSF, UBEC, Electricity, Criminal Justice, Media and Journalism, cross-cutting: CSO, cross-cutting: Behavior Change, and cross-cutting: Elections.

⁵ While some non-grantmaking activities involve monetary outlays (such as training or X-grants for conferences), many are done by MacArthur Foundation staff and cannot be easily costed. Thus, no specific non-grantmaking value is reported.

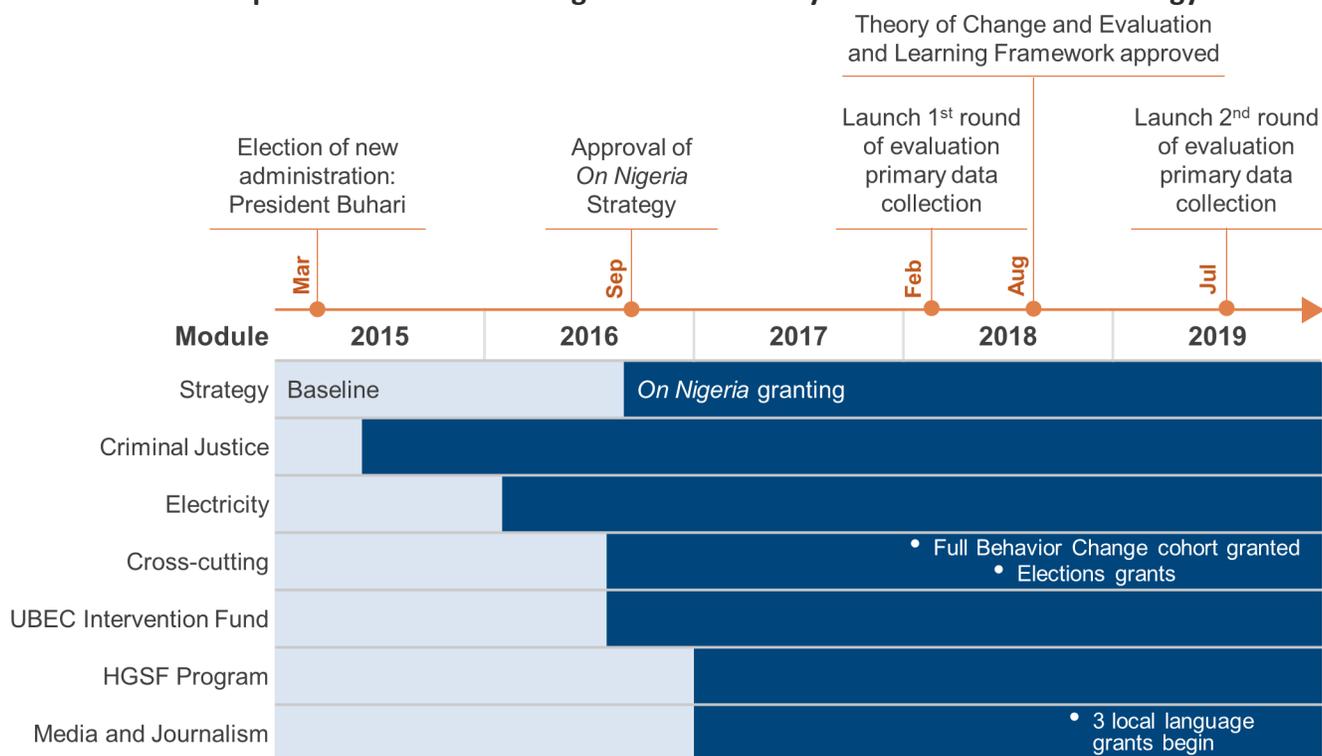
OVERVIEW OF ON NIGERIA'S EVALUATION AND LEARNING FRAMEWORK

The On Nigeria Evaluation and Learning Framework—and the results presented in this paper—reflect the complexity of combatting corruption and strategies to address it. The MacArthur Foundation has designed On Nigeria evaluation and learning activities to achieve two equally important purposes: (1) facilitate ongoing learning to inform On Nigeria decision makers, and (2) provide evidence of On Nigeria's progress toward results and contribution to change. The Evaluation and Learning Framework addresses evaluation questions related to outcomes, impacts, landscape, and feedback. See **Annex 4** for details.

On Nigeria's Evaluation and Learning Framework uses a mixed-methods, sequential design to measure progress toward outcomes and impacts at regular time intervals, and a combination of exploratory and descriptive data to answer landscape and feedback evaluation questions. The evaluation design employs seven different methods. Primary data sources include a telephone survey, media monitoring, qualitative interviews and focus groups, and feedback workshops. Secondary data sources entail document review, grantee data, and corruption indices.

The election of President Buhari in early 2015 on an anticorruption platform provided one of the initial windows of opportunity for the Big Bet On Nigeria and frames the start of the evaluation baseline period for all modules. The start of initial granting for each module bounds the end of that module's baseline period. Thus, the baseline period is specific to each module (see **Exhibit 3** below). The baseline period represents “what was,” while the period starting with On Nigeria grants represents “what is.” Secondary-source data have been compiled as far back into the baseline period as available and generally begin in 2016. The evaluation team has conducted two rounds of primary-source data collection: one in 2018 and the other in 2019 (see **Annex 5**).

Exhibit 3: Baseline periods and when On Nigeria was active by module and for the strategy overall



Data collection, sampling, and analysis have been designed to maximize evaluation rigor within the time and resources allocated. However, On Nigeria’s Evaluation and Learning Framework operates within four main design challenges: (1) the difficulty of measuring corruption concretely and objectively, because corruption is a collective term for a variety of hidden, generally illegal actions; (2) the limitations of analyzing On Nigeria’s contribution within a complex system and across various geographies in Nigeria; (3) limited availability of public, Nigerian state anticorruption monitoring data, which requires construction from press releases and grantee sources; and (4) lack of baseline data for some measures.⁶

⁶ The first round of primary data collection under the Evaluation and Learning Framework took place in 2018, almost 2 years after the end of the overall strategy baseline, and up to 3 years after the end of the baseline period for some modules. Primary data collection required a fully articulated theory of change with corresponding measures; neither of these were available prior to initial granting. Baseline data available include media monitoring data starting in 2016, some secondary-source data, and reconstructed baseline through qualitative data collection.

WHAT WE ARE LEARNING

Evaluation evidence is intended to facilitate learning and serve as one input to determine the next stage for On Nigeria. This section starts with findings for the overarching strategy, followed by findings for each module. Each section aims to address the following three questions:

1. Does progress to date demonstrate momentum and provide a line of sight to significant, meaningful, and sustainable long-term outcomes and impact?
2. Is the theory of change valid and adequate to reach the intended impacts?
3. Does the landscape suggest continued windows of opportunity for progress toward On Nigeria’s intended outcomes and impacts?

In March 2018, the On Nigeria team identified a set of milestones for the progress for each module they hoped to reach by 2020, based on the interim and long-term outcomes from the module theories of change. These milestones highlighted the most important areas of progress the team felt were necessary to demonstrate the viability of the pathways to change and gain initial traction toward impact. Data on progress related to these milestones will be referenced in the module sections below, and the milestones defined in 2018 are presented in text boxes for each module.

Strategy

Does progress to date demonstrate momentum and provide a line of sight to significant, meaningful, and sustainable long-term outcomes and impact?

Progress measured to date suggests that On Nigeria has contributed to several pockets of significant and meaningful accountability outcomes in targeted geographies, sectors, and systems, as shown by the data referenced in module-specific sections below. Across all modules and cross-cutting areas of work, “voice” actors have played an increasingly visible role in demanding accountability, advocating for reforms, engaging citizens in anticorruption issues, and monitoring projects and legal compliance, while the media publish more and somewhat higher quality reporting on corruption and anticorruption issues. This progress provides “proof-of-concept” for tactics designed to leverage civil society’s voice, particularly related to increasing advocacy and monitoring, and demanding the transparency and accountability needed to ensure Nigerians receive the services they are due in education and electricity. The effects of this increased “voice” have been manifested in “teeth” actors’ responses, particularly in HGSF and Criminal Justice, but also in Electricity, UBEC, and Media and Journalism. Many cross-cutting areas of the strategy, such as behavior change (for which granting started in 2018) are still too early in implementation and data are too limited to assess progress even on interim outcomes.

There are variable levels of meaningful progress with regard to accountability in On Nigeria’s target sectors and geographies, with HGSF showing the most promise, UBEC being in-between, and Electricity struggling the most.

An improving policy framework at the federal and state levels has bolstered corruption response mechanisms broadly, demonstrating substantial momentum toward “teeth” outcomes. The Government of Nigeria continues to make progress on its anticorruption agenda by putting into effect laws and policies, while adoption of the federal Administration of Criminal Justice Act (ACJA) and state Administration of Criminal Justice (ACJ) laws has improved the legal framework that underpins the criminal justice sector’s ability to respond to corrupt acts. Meanwhile, nascent corruption response systems in education programs (HGSF and UBEC) and by the Nigerian Electricity Regulatory Commission (NERC), particularly the use of sanctioning, have strengthened “teeth” in On Nigeria’s target sectors. This progress has enjoyed support from champions at the highest levels of government, but implementation at lower levels of the bureaucracy has been slower, especially within states and electricity distribution companies (DISCOs). Progress with regard to transparency systems that can prevent corruption from occurring in the first place varies by On Nigeria’s modules, with HGSF showing the most promise and electricity struggling to make progress toward outcomes due to sectoral challenges. This progress shows that in contrast to corruption response mechanisms, the transparency and prevention systems tend to be more idiosyncratic to each module, with the most promising systems tailored to the most prevalent corruption risks faced in each module. These systems are discussed in detail in each module’s section below.

There has been meaningful progress in strengthening the criminal justice system (through expansion of ACJ laws in almost all states), while strengthening of Media and Journalism has been slower but appears steady.

Grantees have focused a significant amount of their efforts within the modules on building skills of community, legal, and media actors. This area of skill building is hard to summarize, because much of it is specific to the separate modules and the strategy-level theory of change did not originally articulate skill-building outcomes at the overarching level. However, important skill-building work for the broad anticorruption movement has occurred among grantees as a result of the MacArthur Foundation’s non-grantmaking efforts, and grantees talk about anticorruption work with a higher degree of sophistication than 3 years ago.

Exhibit 4: Three most useful non-grantmaking collaboration activities

Source: 2019 grantee survey

Sample: 66 grantee organizations

	Cohort-Based Approach to Grantmaking
	Cross-Cohort Grantee Convenings
	Connecting Grantees to Other Key Actors in Anticorruption

Collaboration stands out as an area where progress in the first 3 years has been particularly dependent on non-grantmaking activities (**Exhibit 4**). The cohort model, in particular, has strengthened collaboration among grantees within modules for effective harmonization, leveraging

complementary roles, and sharing lessons learned. At the same time, collaboration is more limited across cohorts and particularly limited across different categories of actors (civil society, media, and government). Collaboration between civil society and the media is growing in areas where the MacArthur Foundation works directly; more broadly, evidence indicates a lack of collaboration in areas where the MacArthur Foundation does not work.

At the long-term outcome level in target states and the impact level nationally, insufficient time has passed to detect evidence of changes in citizens’ norms related to corruption and accountability—demanding services (**Exhibit 15, Exhibit 16**), being intolerant of corruption (**Exhibit 17, Exhibit 18**), not engaging in corruption themselves (**Exhibit 19**), and their perceptions of anticorruption wins (**Exhibit 63**). Broader evidence suggests media report substantially more on corruption allegations than anticorruption wins (**Exhibit 12**).

On Nigeria’s work to date in developing and testing a range of tactics and entry points relevant in the Nigerian context means sustainability of current gains, and spread to other geographical and content areas are important for the ultimate success of the strategy. However, at present, it is too early to evaluate sustainability and spread, leaving these elements of the strategy relatively untested; this could be an area for focused investigation in 2020. Based on the evidence at the strategy level, the five modules, and the cross-cutting areas, there is a potential line of sight to national strategy-level impact: There are several areas of productive work that can contribute to getting to national-level impact, but given the gaps in the current theory of change and measurable progress, there is not a clear line of sight to this impact at present.

Exhibit 5: Strategy level of progress related to outcomes and impacts

Level of Theory of Change	Progress on Strategy Outcomes				
	(numbers represent outcome numbers as seen in Annex 2)				
Interim – Skill Building	1				
Interim – Collaboration	2				
Interim – “Voice”	3	4	5	6	
Interim – “Teeth”	7	8			
Long-Term Outcomes	9	10	11	12	
Impact	13	14	15	16	17
Impact/Goal	18				

- # Substantial progress: Clear signs of movement since the beginning of On Nigeria
- # Moderate progress: Some momentum visible since the beginning of On Nigeria
- # No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- # Unable to measure change from previous periods (data not available)
- # No primary data collected specifically for this outcome
- # No outcome

Is the theory of change valid and adequate to reach the intended impacts?

Progress to date provides good evidence of the validity of On Nigeria’s sandwich strategy in the Nigerian context. It demonstrates that concomitant pushes from both “voice” and “teeth” actors,

collaborative efforts, and a narrowing space for corrupt practices provide a viable pathway for change, and the MacArthur Foundation can influence these drivers. The ultimate goal of On Nigeria’s endeavors is to reduce corruption by supporting Nigerian-led efforts that strengthen transparency, accountability, and participation. On Nigeria’s hypothesis is that it can demonstrate that corruption is not inevitable by:

1. Reducing citizens’ everyday experiences with and exposure to corruption in electricity distribution and two federal programs in the education sector
2. Using the current government’s anticorruption campaign as a springboard for a larger national movement
3. Helping citizens see progress in the fight against corruption

Many of the assumptions in the theory of change about context remain valid. Overall, those modules where assumptions are largely holding—HGSF and Criminal Justice—have shown the most progress, while modules where validity of assumptions is more mixed have more limited progress to date—UBEC and Electricity. Of the three assumptions at the strategy level (**Exhibit 22**), evidence confirms one is valid (government adopting laws and policies that address corruption) and one is partially valid (structural barriers independent of corruption that impede service delivery can be overcome). The third assumption—government officials internalize norms of transparency and accountability—has limited data available. It should be noted that while the strategy-level theory of change has included interim and long-term outcomes for the cross-cutting areas since 2018, it does not include any explicit assumptions for this work.

To date, only HGSF has demonstrated significant results in improving citizens’ everyday experiences, but UBEC appears to show a line of sight to reducing incidences of corruption in target geographies in a way that is tangible for citizens. At present, there is not a line of sight for the Electricity module, and it is unclear whether one can be achieved through a shift in effort or whether contextual factors provide insurmountable barriers.

The strength of the On Nigeria theory of change is its multifaceted nature, which aligns to the multifaceted nature of corruption. While progress to date suggests the theoretical basis for On Nigeria’s strategy holds in the Nigerian context, putting the whole “sandwich” together, it is not enough for “voice” and “teeth” to show independent progress; they need to work together to effect sustainable long-term change. Signs of this interplay effecting change in service provision have emerged in the HGSF, UBEC, and Media and Journalism modules; in the Criminal Justice module, advocacy demands from civil society have manifested in “teeth” actors’ responses to passing state ACJ laws. Overall, however, much of the success to date has been isolated in either the “voice” or “teeth” sides of the sandwich. Ways to strengthen collaboration within the field (beyond On Nigeria grantees) may be an area where success to date could be leveraged to refine the theory of change and strengthen the sandwich dynamics. On Nigeria’s theory of change was not fully articulated until after much of the granting had occurred. Refining the theory of change for the next period of work, before granting occurs, will allow On Nigeria to fully align grantmaking and the strategy. Including the cross-cutting areas only in the overall strategy-level theory of change, without individual theories of change for each area, resulted in less articulation of how they fit into the broader picture and a lack

of specific assumptions for them; addressing this gap is a key revision On Nigeria’s experience in its initial period suggests.

Learning from the field during the past 3 years signals three additional broad areas where adjustments to the theory of change might be warranted: (1) translating momentum from module- and geography-specific areas of progress to change at a larger scale; (2) addressing the behavioral norms of those who work within the system; and (3) articulating the interplay of this anticorruption work with the broader evolution toward good governance in Nigeria, in particular the strength of electoral institutions and the rule of law (an issue routinely raised in the literature, including by Jonathan Fox).

Does the landscape suggest continued windows of opportunity for progress toward On Nigeria’s intended outcomes and impacts?

Evidence suggests that the window of opportunity is still—and perhaps even more—open, because there is now a coalition of anticorruption reformers that spans multiple types of actors: government, civil society, and the media. While Buhari’s candidacy made anticorruption a top priority and opened On Nigeria’s initial window of opportunity,⁷ there is now something that might be considered the beginnings of a movement. The Buhari administration was not the only element of the window of opportunity in 2015: Nigeria’s robust civil society and diverse media landscape were also key contextual factors to the successes On Nigeria has achieved since. Still, the appearance of corruption on the political agenda in a way never seen before was a decisive change in context in 2015, and it coincided with Nigeria’s first democratic transfer of power.⁸ At the same time, opinion polling in 2015 from multiple sources indicated Nigerian citizens’ interest in corruption spiked from one among many priorities to their most important priority. In the time since then, corruption has returned to a more historically normal level for Nigerian citizens as one of their top three priorities (**Exhibit 21**).

Evidence suggests that the enabling conditions necessary for the On Nigeria’s strategy to advance are present in some areas and more questionable in others.

Within this broad context, windows of opportunity vary across the modules, and evidence suggests that the enabling conditions necessary for the On Nigeria strategy to advance are present in some areas and questionable in others. For HGSE, Criminal Justice, and Media and Journalism, the enabling conditions at present appear to be mostly favorable for continued MacArthur Foundation’s investment. The Electricity module faces more contextual challenges; the viability of the electricity sector itself inhibits efforts to increase transparency and accountability in electricity distribution. For

⁷ Other initial windows of opportunity related to specific modules and included the 2013 privatization of the electricity sector, 2015 signing of ACJA, and the launch of HGSE program.

⁸ Nigeria, in 1999, returned to electoral democracy, but the 2015 elections represented the first where power peacefully passed from an incumbent party to the opposition at the federal level.

UBEC, the situation is somewhere in between, with some political will but limited functional transparency (through open contracting systems).

There has been some evolution in the landscape since 2015, and the risks to the window of opportunity in the future could be different. The two primary risks that arise from the evidence at present are: (1) closing of the civil society space, because this would impede “voice” actors’ and grantees’ ability to act, and (2) the elections in 2023, both because of the inherent political maneuvering that will happen inside parties and the possibility of an administration that is hostile to the anticorruption agenda.

This suggests that there remains a viable entry point to continue this work. If the coalition of anticorruption reformers were to grow, the window for effecting change could open even wider as a result of existence of additional partners to work with. On the other hand, if the government pursues actions that further tighten the civil society and media space, the window of opportunity could close rapidly.

Specific Module Findings



National Home Grown School Feeding (HGSF) Program

The HGSF program represented a key feature of President Buhari’s 2015 campaign. It has a dual goal to provide school lunch for 10 million public primary school students and support local agriculture. The federal government launched HGSF in December 2016 as a reboot of an earlier program from the 2000s, which had failed in part due to perceptions of rampant corruption and poor service delivery. By 2016, the older program was only functioning in a few states; however, it had managed to run more successfully in Osun State since 2006, which formed the basis for the national program redesign. HGSF program meal delivery involves a supply chain that spans numerous government officials, local farmers, aggregators (those providing food to cooks), cooks, and school personnel, which creates multiple opportunities for corruption.

Because the HGSF module targeted a “new” program, On Nigeria’s goal was to keep corruption from taking root, rather than rooting it out. In the strategy’s first 3 years, On Nigeria’s HGSF module sought to demonstrate that community monitoring by “voice” actors in target schools combined with “teeth” actions by government officials could create the accountability needed to ensure corruption did not hamper children from receiving meals, as outlined in milestones shown in the box below. Grantees’ community monitoring efforts focused on engaging parents and community-based organizations in target schools in select local government areas (LGAs) in Kaduna and Ogun; in total, grantees targeted 322 schools in Kaduna (8 percent of schools) and 140 schools in Ogun (9 percent).⁹

⁹ Sources: EnCompass calculated state coverage rates using school lists On Nigeria grantees provided. For Ogun State, a list of all primary schools by LGA from the Ogun State Universal Basic Education Board provided the denominator.

Meanwhile, their advocacy to LGA, state, and federal officials sought to secure transparency, corruption-prevention measures, and sanctions in response to corruption, and to spread proven transparency and accountability practices to other schools. As of January 2020, On Nigeria had made 13 grants totaling \$5.7 million to nine CSOs, eight of which began their initial funded activities in September 2017 (the remaining one organization began work at the beginning of 2017); 71 percent of approved funds have been paid.

On Nigeria’s efforts since 2017 to reduce corruption and improve access to quality meals in the HGSF program have contributed to the momentum among “voice” and “teeth” actors needed to achieve interim and long-term outcomes in target states. In Kaduna and Ogun, there is clear evidence of progress in interim outcomes. “Voice” actors at the target schools—civil society and community-based organizations, school-based management committees (SBMCs), school personnel, and parents—are actively engaged in monitoring and demanding HGSF service delivery (**Exhibit 23, Exhibit 24**).

A broad range of HGSF actors, including government, CSOs, and community monitors, collaborate in these target schools to improve HGSF monitoring and service delivery, although collaboration between civil society and the media remains more limited. Federal and state officials have exercised their “teeth” functions by pursuing states’ and vendors’ accountability via sanctions (or threat of sanctions), and putting in place systems that prevent opportunities for corruption, such as direct payment systems, open publication of menus (consistent with principles of open contracting), and the use of signed registers to track meal delivery and quality (**Exhibit 25, Exhibit 26**).

At the long-term outcome and impact levels, a range of actors along the HGSF supply chain use accountability and transparency systems to ensure appropriate flow and use of HGSF funds (**Exhibit 27**). Overall, there has been evidence of substantial political will and collaboration between “teeth” and “voice” actors to achieve quality HGSF service delivery. Complaints (**Exhibit 28**) and perceptions of corruption generally appear minimal, and parents indicate satisfaction with meal quality and quantity, not only in Kaduna and Ogun states, but across Nigeria (**Exhibit 29**). Citizens’ perception of and tolerance for corruption are relatively low, particularly in Ogun state (**Exhibit 30**).

There is evidence that On Nigeria has contributed to this progress on both the “teeth” and “voice” sides of the equation. Several transparency and accountability measures have been “baked into” HGSF from the beginning, with help from a MacArthur Foundation grantee that supported program design and rollout at the federal level. In the schools where grantees work, local actors’ participation in monitoring and demand has elicited responses from school-, LGA-, and state-level officials that led to programmatic improvements to support meal quality (**Exhibit 31**).

What On Nigeria hoped to achieve in HGSF by 2020

(1) HGSF officials have and use systems to increase accountability and transparency in the flow and use of HGSF funds; (2) CSOs actively monitor and document whether eligible students are receiving meals meeting timing, consistency, and quality standards; (3) actors along the HGSF chain use and participate in accountability systems; (4) corruption-related kinks in the system are being resolved; and (5) journalists report on HGSF in Kaduna, Ogun, and other states

Exhibit 6 visually summarizes the extent of progress for all HGSF outcomes and impacts, based on measures outlined in **Annex 2**. This snapshot illustrates substantial progress across “voice” and “teeth” outcomes, and emerging progress toward long-term outcomes, which collectively result in On Nigeria being on track for most of the five milestones it set for 2020. This progress suggests substantial momentum to module-level long-term outcomes and a potential line of sight to module-level impacts, where some progress is already measurable.

Exhibit 6: HGSF level of progress related to outcomes and impacts

Level of Theory of Change	Progress on HGSF Outcomes			
	(numbers represent outcome numbers as seen in Annex 2)			
Interim – Skill Building	1	2	3	
Interim – Collaboration	4	5	6	
Interim – “Voice”	7	8	9	10
Interim – “Teeth”	11	12	13	
Long-Term Outcomes	14	15	16	17
Impact	18	19	20	21

- # Substantial progress: Clear signs of movement since the beginning of On Nigeria
- # Moderate progress: Some momentum visible since the beginning of On Nigeria
- # No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- # Unable to measure change from previous periods (data not available)
- # No primary data collected specifically for this outcome
- No outcome

All the explicit assumptions underlying the HGSF module relate to causal links in the theory of change and external context. Evidence suggest these assumptions generally hold (**Exhibit 32**): (1) there is political will at state and federal levels to address governance and prevent corruption in HGSF, (2) states have signed on and rolled out the program, and (3) government actors in target states and at the federal level have shown responsiveness to civil society monitoring and advocacy. Evidence is mixed regarding the assumption that state and school officials have adequate skills to manage the program effectively, but progress toward outcomes indicates that this mixed assessment has not been so strong as to inhibit program management.

The Buhari administration’s support for a new program offered a window of opportunity to “bake in” transparency, accountability, and civil society’s engagement in the HGSF program. The government of Nigeria has continued to support the HGSF program and expanded it from a single state in December 2016 to 19 states in 2017, and 35 states by October 2019. The HGSF program has been able to maintain reasonably strong accountability policies and tools throughout this expansion. In the target states of Kaduna and Ogun (where evidence is available), the landscape continues to present some challenges. There have been reports of political interference, and cooks and others along supply chain being shortchanged. There was a multi-month break in meal delivery in many states in early 2019, while the National Bureau of Statistics verified the number of enrolled pupils and cooks engaged at different schools; evidence from target schools indicates this break caused confusion at the community level. As the program is set to transition from the Vice President’s office to the Federal Ministry of Humanitarian Affairs, Disaster Management, and Social Development, it will be important to consider how the transparency and accountability successes—particularly on the

“teeth” side—can be consolidated and institutionalized. In addition, the President’s recent budget proposal could foreshadow cuts to this program (or cuts to other National Social Investment Programs). However, these challenges do not appear severe enough to have prevented the On Nigeria strategy from advancing toward outcomes envisioned in the HGSF module.

Learning to date in the HGSF module suggests that the theory of change provides a valid pathway to change in areas of direct intervention. Under the conditions of a high-profile new federal program that enjoys substantial political will, implementation of anticorruption systems through “voice” actors’ advocacy and technical assistance to “teeth” actors is feasible. In combination with funding for community monitoring, this makes it possible to achieve the dynamics of the sandwich to *prevent* corruption from taking root; this is distinct from leveraging sandwich dynamics to root out *existing* corruption, and is an important learning unique to the HGSF module. “Voice” progress shows that tactics to increase community-level action for monitoring and demanding services are effective in participating schools, while “teeth” progress demonstrates that tactics to engage the government in anticorruption measures can also be effective. The HGSF experience includes models of several specific anticorruption systems that could be spread to other programs with MacArthur Foundation’s support: direct payment of vendors, open publication of menus, and the use of signed registers to track program information. Importantly, the interplay between “voice” and “teeth” forces demonstrated by officials’ responses to civil society’s demands shows that virtuous collaboration is possible to achieve. It is not yet clear whether this dynamic is scalable to non-target areas that do not enjoy direct funding for community monitoring, nor whether “teeth” actions alone would be sufficient to limit corruption in non-target areas without community monitoring. This suggests that On Nigeria needs to seek adjustments in the module’s theory of change and its tactics that can scale community-level “voice” action beyond current target schools.

It is possible that HGSF experience further points to the importance of targeting programs where there is an initial threshold of political support to limit corruption. It is not known what would happen in the absence of continued MacArthur Foundation’s investment; nonetheless, progress to date shows that many anticorruption systems are nascent, and the current level of engagement by education CSOs in accountability work is a relatively recent phenomenon. This suggests that the HGSF experience has value for that specific education program, expansion of strategies for building community momentum in other sectors, and exploring how best to tell the story of anticorruption success in collaboration with media and journalism actors. However, the HGSF module and its theory of change would benefit from more explicit “voice” and “teeth” tactics that will support institutionalization of progress at the level of long-term outcomes.

UBEC Intervention Fund

The Universal Basic Education Commission (UBEC) administers the Universal Basic Education Intervention Fund program to accelerate infrastructure renewal and teacher development in public primary and junior secondary schools. Nigeria established the UBEC Intervention Fund in 1999, but the fund did not become operational until passage of the 2004 Universal Basic Education Act. The fund is financed through a dedicated 2 percent of the federal government’s Consolidated Revenue Fund. To participate in the Intervention Fund, states must develop a state action plan that details the

specific infrastructure and furniture projects they will use the funds for, contribute 50-percent matching funds for identified projects, and provide a detailed accounting of funds used in the previous year. Upon receipt of funds distributed by UBEC, each state's State Universal Basic Education Board (SUBEB) hires contractors to carry out the specified infrastructure projects.

Through its UBEC module, On Nigeria sought to demonstrate that community monitoring by “voice” actors in target schools in combination with “teeth” actions by government officials could create the accountability needed to make sure planned infrastructure and furniture projects are completed to standard and on time. This is outlined in the milestones in the box shown on the right. On Nigeria focused only on the infrastructure and furniture (and not teacher development activities) to allow for monitoring of tangible accountability of spending communities could more easily verify. Grantees' community monitoring efforts focused on engaging parents and community-based organizations in target schools in select LGAs in Kaduna and Lagos states. Cumulatively to date, grantees have targeted 96 percent of the schools in the 2014–2016 Kaduna state basic education action plan (which represents 160 out of 4,670 total schools in the state, or 3.4 percent) and 88 percent of the schools in the 2015–2017 Lagos state basic education action plan (20 out of 1,366 total schools in the state, or 1.5 percent).¹⁰ At the same time, grantees' advocacy to LGA, state, and federal officials sought to secure transparency, corruption prevention measures, and sanctions in response to corruption, and to spread proven transparency and accountability practices to other schools. Two grantees have supported piloting and rolling out of another grantee's Budeshi platform as an open contracting data standard (OCDS) system.¹¹ As of January 2020, through On Nigeria, the MacArthur Foundation has made 16 grants, totaling \$5.1 million to 11 organizations (one government entity and 10 CSOs). Three grantees began work in 2016 and the rest in September 2017; 70 percent of approved funds have been paid.

What On Nigeria hoped to achieve in UBEC by 2020

- (1) UBEC/SUBEBs have and use systems to increase accountability and transparency in the flow and use of UBEC resources (particularly the OCDS);
- (2) CSOs actively monitor and document whether resources are reaching the intended schools;
- (3) actors along the UBEC supply chain use/participate in accountability systems;
- (4) UBEC responds to citizens' reports, and sanctions SUBEBs and vendors for inappropriate use of funds;
- (5) journalists report on UBEC in Kaduna, Lagos, and others states;
- (6) schools receive UBEC-funded resources, as laid out in state action plans operationalized in 2018–2019

¹⁰ Sources: EnCompass calculated the proportion of schools covered using information On Nigeria grantees provided; these figures are cumulative over the total period of intervention (because infrastructure projects represent one-off occurrences). The total number of schools in Lagos is based on figures On Nigeria grantees provided; the total for Kaduna is based on school lists in the Ministry of Education's Kaduna State Annual School Census Report 2013–2014.

¹¹ OCDS systems aim to increase transparency by disclosing data regarding all stages of the contracting process, which allows for analysis of contracting data by a wide range of users. See: <http://standard.open-contracting.org/latest/en/>. The Budeshi platform tracks public funds from budget appropriation through the bidding processes to contract awards, and eventually, will include contract implementation information.

On Nigeria’s efforts to reduce corruption and improve flow of UBEC intervention funds have contributed to some progress toward interim outcomes and momentum for long-term outcomes. Since the start of On Nigeria, “voice” actors in target schools in Kaduna and Lagos states—including civil society and community-based organizations, such as SBMCs, parent-teacher associations, and school officials—demand quality services from the SUBEB and contractors with the help of grantees. They track project delivery, and demonstrate a strengthened understanding of how to monitor UBEC projects and demand promised resources (**Exhibit 33, Exhibit 34**). School and community groups at target schools have increased collaboration among themselves and with other civil society groups to amplify and leverage activities. UBEC has increased its monitoring of SUBEB projects and used its sanctioning power (or the threat of sanctions) with non-compliant SUBEBs (**Exhibit 35, Exhibit 36**). Government’s progress in implementing OCDS systems is still limited; only Kaduna State actively works to implement a version supported by an On Nigeria grantee (**Exhibit 37, Exhibit 39**). Thus, there is continued weakness in transparency at the state level. There is evidence of willingness to roll out an OCDS system in Ekiti State, which has signed on the Open Government Partnership with its commitment to open contracting. More broadly, SUBEB’s monitoring and response behavior remains mixed, and appears stronger in Kaduna than in Lagos.

At the long-term outcome level, these results have meant that there is improved accountability in the flow of allocated funds in target states (**Exhibit 38**) and citizens in targeted states report seeing more projects initiated and completed, but parents perceive that corruption still hinders program implementation (**Exhibit 40, Exhibit 41**). While it appears that the government is improving the flow of funds, the influx of funds from Paris Club¹² rebates and direct implementation of projects by UBEC make it difficult to interpret the cause of this perceived improvement. There is not yet measurable progress toward impact; similar to results in target states, nationally, most parents feel that corruption hinders the UBEC Intervention Fund program (**Exhibit 40**).

There is evidence that On Nigeria has contributed to increased transparency and accountability in the UBEC Intervention Fund through its funding of the grantee-developed Budeshi system (for open contracting data), more active monitoring by civil society (CSOs, parents, and school committees), and grantee and media efforts to increase knowledge about how the program works. However, the government does not yet appear sufficiently invested in implementing open contracting data systems; currently, the only data in the Budeshi system are historical data grantees entered. As a result, progress to date is not sufficient to realize the intended results, absent a system for transparency on contracting with UBEC and state-matching funds. This suggests the MacArthur Foundation needs to adjust its On Nigeria tactics or pathway to change to advance the adoption of open contracting systems within this module.

Exhibit 7 visually summarizes the extent of progress for all UBEC outcomes and impacts, based on measures outlined in **Annex 2**. This snapshot illustrates generally strong progress in interim outcomes

¹² In 2018, the federal government announced a decision to use Paris Club refund money to supply the missing state counterpart funding that had prevented a number of states from fully accessing the UBEC Intervention Fund. Applying 70 billion Naira from the refund cleared the backlog of state counterpart funds for 26 states and led to heightened activity in the program in 2019; however, implementation of infrastructure projects has not yet begun at the community-level.

for skill building, collaboration, “voice,” and “teeth.” However, long-term outcomes show only moderate progress, and there is no progress in impacts. Of On Nigeria’s five milestones for 2020, only one is fully on track (school-based monitoring); the others show some but not yet sufficient results to generate the ultimate goals On Nigeria’s UBEC module aspires to. This suggests there is some momentum toward module-level long-term outcomes, but evidence does not indicate they can be fully achieved without a functioning OCDS system as articulated in the current strategy. This might require broader government pressure than within a single program. Within this context, there is not a clear line of sight to achieving the impacts, because there is not yet a comprehensive model supported by evidence that could be scaled to other states.

Exhibit 7: UBEC level of progress related to outcomes and impacts

Level of Theory of Change	Progress on UBEC Outcomes			
	(numbers represent outcome numbers as seen in Annex 2)			
Interim – Skill Building	1	2	3	
Interim – Collaboration	4	5	6	
Interim – “Voice”	7	8	9	10
Interim – “Teeth”	11	12	13	14
Long-Term Outcomes	15	16	17	18
Impact	19	20	21	22

Substantial progress: Clear signs of movement since the beginning of On Nigeria

Moderate progress: Some momentum visible since the beginning of On Nigeria

No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation

Unable to measure change from previous periods (data not available)

No primary data collected specifically for this outcome

No outcome

Evidence related to the explicit assumptions underlying the UBEC theory of change has been mixed (**Exhibit 42**). Political will and responsiveness to grantees do exist at the national level, but have been a challenge for grantees at the state level. Management capacity (including for monitoring) is not fully available to run the program efficiently. There is some initial evidence of resources being assigned at the federal level and in Kaduna State to operate Budeshi as a government OCDS system, but to date, resource assignment has mainly been in the form of training government officials at the federal and Kaduna State level. In Kaduna State, a MacArthur Foundation grantee handed over Budeshi to the state government to serve as its open contracting portal in July 2019, after entering historic data as part of a training exercise. The Kaduna OCDS platform now provides procurement information of each pilot ministry, department, and agency for public access, and data input on Kaduna’s OCDS platform (118) has exceeded the grantee’s target. However, this handover has given rise to other questions of official ownership of the portal and overlap with existing (but unused) government OCDS systems. Meanwhile, Lagos State has resisted OCDS adoption. Grantees have found ways to use existing systems, such as bills of quantity, to promote accountability in the interim, but these fixes are harder to access and more resource-intensive to use.

On Nigeria has focused its efforts in UBEC on *rooting out* corruption in an existing program by increasing transparency and accountability in the flow of UBEC Intervention Fund resources. Transparency—and therefore, the ability to hold actors accountable—is predicated on the availability

of information regarding these resource flows through the fund's chain. There continues to be a window of opportunity for this kind of transparency, particularly for OCDS systems (like Budeshi), even if the government is not yet fully invested in operationalizing them and grantees have to enter further contracting data. However, at present, the lack of this information appears to be one of the main contextual constraints. An additional result of the influx of funds from Paris Club rebates adds a further layer of complexity to the UBEC Intervention Fund, creating possible confusion that complicates transparency. Civil society is active and invested organizationally and emotionally (not just financially) in the education sector, and since 2015, has extended that investment to the anticorruption movement. Led by grantees, civil society has developed models and tools for engaging citizens in community monitoring, as well as relationships with government. Kaduna State has signed onto the Open Government Partnership, which led to its commitment to adopt Budeshi as an OCDS system; importantly, the key driver for OCDS adoption in Kaduna was taken at the state government level and applies to all ministries, not just the SUBEB. It appears that contractors, SUBEB officials, and other resistant actors continue to collude on contracts for financial or political gain.

Learning to date in the UBEC module suggests that the theory of change is a partially effective pathway to change in areas of direct community-level intervention, but that “teeth” components related to transparency systems have been harder to achieve; consequently, long-term outcomes and scale might be more difficult to attain. “Voice” progress shows that tactics to increase community-level action for monitoring and demanding services are effective in participating schools, but it is not yet clear whether this dynamic is scalable to schools that do not receive direct On Nigeria grantee support for community monitoring (both in Kaduna and Lagos, and beyond these target states) or to other UBEC program areas (i.e., teachers’ professional development). At the beginning of On Nigeria’s UBEC work, there was substantial misunderstanding about basic tenets of the Intervention Fund program, even within the government education structures; this proved challenging to initial community monitoring. The role of the LGA varies from state to state—and LGA to LGA—but has also emerged as a critical step in the service delivery chain. These are all areas where evaluation data suggest a need to revise the UBEC strategy to provide a clearer line of sight to module-level impacts. Future sectoral work should build in explicit tactics and time to achieve formal clarification of how the program officially operates, before grantees launch community monitoring programs.

In contrast to the federally centralized and high-profile HGSF system, UBEC offers two important lessons about the nature of change in Nigeria’s federal system. First, despite not being a central focus of the administration, within the overall context of the Buhari administrations anticorruption drive, political will can still be tapped into at the federal level. Granting to a “teeth” actor at the federal level helped bring an almost 20-year old program into the anticorruption drive and increased contact with “voice” actors through On Nigeria’s cohort model; for future work, this implies that strategic grants to a government entity can help forge strategic alliances that are essential to the sandwich strategy.

Second, the UBEC module shows the outsized importance of state government in Nigeria’s federal system and suggests that in the future, On Nigeria could do more to engage states and create allies

at multiple levels of government, both for the UBEC module and On Nigeria more broadly. Kaduna's example shows that state-level momentum can be generated at the level of the state administration, not only within the target ministries of the particular program concerned (SUBEBs, in this case). Experience from Kaduna and Lagos also shows that trust-building at the state level can be slow: grantees built their relationships with SUBEBs over the course of years, and progress did not come without pushback.

It is not known what would happen in the absence of continued MacArthur Foundation's investment. However, because corruption prevention systems are still nascent and not yet institutionalized, and overall progress remains tenuous, the results achieved appear fragile. This would suggest that the UBEC module would benefit from an additional focus on institutionalization and sustainability tactics that can consolidate gains. The UBEC module is unique within On Nigeria in that it works to combat procurement corruption, which is one of the key types of corruption in Nigeria. The work to date with Kaduna's open contracting portal, linked with possible states' commitment to the Open Government Partnership and open contracting, indicates potential for both institutionalization and spread, with a shift in tactics and leveraging of other cohorts' efforts (particularly the civil society cohort) to address procurement corruption more broadly, not only in the context of basic education. As in HGSP, the tactics for community engagement in project monitoring provide models for citizens to participate directly in the anticorruption movement, which the On Nigeria strategy could use elsewhere to reinforce an accountability ecosystem.



Electricity Distribution

Nigeria's electricity sector has had a complex and troubled history. As of 2016, the World Bank estimates that only 59 percent of Nigerians had access to electricity,¹³ and even for those who are active customers, service is uneven and generation is far short of demand. In 2013, the Nigerian federal government attempted to resolve some of these issues by privatizing the power sector—selling the electricity generation companies (GenCOs) and DISCOs to private owners. However, the privatization process itself has been criticized as corrupt, favoring insiders who lacked financial capital and technical expertise.¹⁴ There are 11 DISCOs in total, which collectively cover Nigeria; these private operators distribute electricity to customers in catchment areas (most of which cover multiple states). As such, DISCOs serve as the final link in the electricity supply chain. NERC, established by the Electric Power Sector Reform Act in 2005, is an independent body responsible for managing key electricity tariffs, policies, and standards in Nigeria, including regulation of generation, transmission, and distribution activities.

¹³ World Bank. *Access to electricity (% of population)*. Sustainable Energy for All Database. Accessible at: <http://data.worldbank.org/indicator/EG.ELC.ACCS.ZS>. These data come from the 2015/6 Living Standards Measurement Survey, which is a household survey. The 2018 national telephone survey puts electricity access at 92 percent.

¹⁴ Punch. 2019. *Breaking the power sector gridlock*.

Through its Electricity module, On Nigeria sought to demonstrate that support to strengthen customers' use of redress mechanisms by "voice" actors, combined with "teeth" actions by regulators inducing electricity distributors to be accountable to customers and provide transparently priced electricity, could create a virtuous cycle where customers have decreased tolerance for corruption, as outlined in the milestones shown in the box on the right. As of January 2020, the MacArthur Foundation, through On Nigeria, has awarded 11 grants totaling \$4.3 million to seven organizations, including federal regulators, the association of DISCOs, civil society, business analysts, and media organizations; initial funded activity start dates were between February 2016 and September 2017. Grantees' work supporting customers' capacity to exercise their rights and use redress mechanisms focused on specific local districts within the target Abuja and Benin DISCOs. At the national level, grantees' advocacy and regulation worked to advance "teeth" functions by expanding metering, improving customers' complaint response mechanisms, and issuing new regulations. Sixty-five (65) percent of approved funds have been paid to date.

What On Nigeria hoped to achieve in electricity module by 2020

(1) NERC regulations mandate transparency and accountability, and targeted DISCOs increasingly implement new guidelines on billing, metering, and information on progress; (2) targeted DISCOs, customers, CSOs, and consumer advocacy organizations engage in constructive dialogue and resolve complaints; and (3) customers in target DISCO catchment areas access electricity through meters and use their awareness of the customer's rights to get redress

Within the Benin and Abuja DISCO catchment areas, there are pockets of progress and some momentum toward productive dynamics among DISCOs, their customers, and CSOs. A range of electricity actors, including DISCOs, Federal Competition and Consumer Protection Commission (FCCPC), and CSOs use collaborative tactics, such as town halls, to create constructive dialogue. Citizens' awareness of their rights related to electricity distribution and redress mechanisms appears to be increasing (**Exhibit 43**). In target areas, "voice" actors—grantees, CSOs, media, and customers—both actively monitor and use redress mechanisms to demand services customers should be receiving (**Exhibit 44, Exhibit 45**). Alongside these efforts, the federal government (particularly NERC and FCCPC) has been very active in developing policies (**Exhibit 46**) and enforcing accountability through sanctions (**Exhibit 47**) to improve DISCO operations and transparency. Targeted DISCOs have implemented some policies aimed at improving their own transparency and accountability (**Exhibit 48**). Prepaid metering of all customers is intended to improve cost transparency; rollout began slowly and accelerated over the past year, but remains incomplete (**Exhibit 49**). Nevertheless, customers' perceptions of price transparency appear to have declined in the target Abuja DISCO and nationally between 2018 and 2019 (**Exhibit 50**). Nationally, citizens perceive an increase in overall electricity sector corruption, although perceptions within target DISCOs did not substantially change.

Exhibit 8 visually summarizes the extent of progress for all Electricity module outcomes and impacts, based on measures outlined in **Annex 2**. This snapshot illustrates substantial progress in skill building, "voice," and federal regulators' "teeth" actions, but only moderate progress for collaboration and

DISCOs’ “teeth” actions. Long-term outcomes and impact show moderate or no progress. This mixed progress reflects the levels of achievement of On Nigeria’s three 2020 milestones: although there is some movement on each, none is fully on track. The pockets of success in “voice” and federal regulatory action could be leveraged in the future, but the electricity sector’s broader context has impeded generating momentum toward the module’s long-term outcomes. Consequently, there is no clear line of sight to achieving the module impacts, because there is not yet a comprehensive model supported by evidence that could be scaled to other DISCOs.

Exhibit 8: Electricity distribution level of progress related to outcomes and impacts

Level of Theory of Change	Progress on Electricity Outcomes			
	(numbers represent outcome numbers as seen in Annex 2)			
Interim – Skill Building	1	2	3	
Interim – Collaboration	4	5	6	
Interim – “Voice”	7	8	9	10
Interim – “Teeth”	11	12	13	14
Long-Term Outcomes	15	16	17	18
Impact	19	20	21	22

Substantial progress: Clear signs of movement since the beginning of On Nigeria
Moderate progress: Some momentum visible since the beginning of On Nigeria
No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
Unable to measure change from previous periods (data not available)
No primary data collected specifically for this outcome
No outcome

The Electricity module had more assumptions than any other module due to the complexity of the electricity sector and the fact that service delivery (distribution) is dependent on many other parts of the electricity supply chain and the sector’s structure. Of the nine assumptions evidence was available for, only the one that key sector actors discuss ways to improve provision of information on metering, tariffs, and DISCO performance holds (**Exhibit 51**). Five assumptions have mixed levels of confirmation, related to adequacy of meter supply in country, effective DISCO rollout of meters, and the existence of feasible plans for big-picture solutions to the electricity sector’s issues (including generation of adequate power, transmission capacity, and DISCO viability). Three assumptions do not hold: (1) DISCOs have an adequate infusion of capital, (2) cost-effective tariffs exist, and (3) consumers refrain from illegally bypassing DISCO connections. These three assumptions are critical for DISCOs’ financial viability, which is an assumed necessary precursor to improving transparency and accountability in the sector.

Electricity supply is a key citizens’ concern, and the sector’s restructuring offered a window of opportunity to create momentum in the fight against corruption. However, sectoral concerns loom large in this module, and challenges in making headway, in part, stem back to a flawed privatization process. In electricity distribution, challenges and inhibitors continue to persist in infrastructure (generation, transmission), shortages of meters (although this is slowly being resolved), structural issues related to electricity pricing, and certain actors’ (including consumers, DISCOs, and government officials) resistance to change. The new Siemens plan (which is only a high-level memorandum of understanding at this time) might offer a new window for sectoral improvements

and the enabling conditions On Nigeria can leverage. However, it was developed with limited consultation among key actors in the sector, and many problems the Power Sector Recovery Plan (2017–2021) was not able to effectively address will need to be resolved as the plan advances.

Learning to date in the Electricity module shows that too few of the theory of change assumptions hold to provide a valid pathway to change. Even under the condition where improving service delivery in the sector is a top citizens' priority, the contextual challenges are too deep for the theory of change to function as intended. Despite this, an important learning from On Nigeria's 3 years of experience in the Electricity module is that even in this challenging context, some aspects of the sandwich are still able to take root—as in UBEC and HGSF, “voice” tactics focused on service delivery have proven effective in engaging citizens in transparency and accountability through concrete actions in target areas. There is a risk that citizens' engagement could backfire if they become disillusioned with the broader anticorruption movement due to negative experiences in the electricity sector, a “known unknown” to watch for; while this risk is not unique to the Electricity module, evidence suggests that its probability to occur is higher in this sector. Similar to the UBEC module, On Nigeria's experience in the electricity sector has shown that partnering with “teeth” actors is an effective tactic to facilitate regulatory reform. Ultimately, however, without improved DISCOs' compliance and responsiveness to enable complaint resolution mechanisms to function fully, the virtuous cycle intended by the sandwich strategy cannot be achieved, which limits the attainment of long-term outcomes.

Experience in the Electricity module is illustrative of the web of overlapping interests—both corrupt and more broadly—that are the very reason rooting out existing corruption is challenging. The Electricity module, in combination with HGSF and UBEC, could point to the minimum threshold of political (and in this case, private sectors') will necessary to reform a sector and address corruption. To this end, it is notable that major actors within the government, such as the military, have been resistant to broad sectoral reform (paying for electricity), while the private electricity sector is much more concentrated than private-sector interests in UBEC and HGSF (which involve numerous, but smaller scale vendors). If the MacArthur Foundation is to continue On Nigeria efforts in the electricity sector, it will be necessary to reframe the strategy to operate realistically in the current context, and identify clearly what overall strategy-level outcomes and impacts it would support. Regardless of the MacArthur Foundation's future strategy in Electricity, evaluation evidence from this module, along with that of the other sectoral modules, suggests the next phase of On Nigeria work should include tactics to institutionalize promising “teeth” measures and share promising customer “voice” tactics, whether to support spread (if staying in the sector) or sustainability (if exiting). The most promising progress in the module—customers' demand for accountability—should not be abruptly abandoned, but nurtured to transfer to other outlets. On Nigeria's work in the electricity sector demonstrates how cross-cutting CSO cohort grantees have affected government and private-sector responses to corruption alongside electricity cohort grantees working on “voice” activities at the community and DISCO levels.



Criminal Justice System

President Goodluck Jonathan signed the ACJA into law in 2015, with sweeping provisions aimed at improving and harmonizing the criminal justice system, narrowing the loopholes for ill-intentioned actors to avoid prosecution and conviction. Among the many ACJA elements, four in particular support the fight against corruption through criminal prosecution in the courts (see box). Although the ACJA does not explicitly address corruption within the criminal justice sector, strengthening the capacity of the criminal justice system in general and the four essential ACJA elements in particular can significantly boost the system's ability to efficiently and effectively investigate and prosecute corrupt acts across all sectors.

Four Essential ACJA Elements for Anticorruption

1. Use of qualified legal practitioners only in prosecuting criminal cases
2. Regulations limiting interlocutory appeals
3. Speedy dispensation of trials
4. Inclusion of state-level Criminal Justice Monitoring Committee

On Nigeria's efforts in the Criminal Justice module rest on this bedrock. In its first 3 years, On Nigeria's work on criminal justice has sought to demonstrate that policy advocacy can positively contribute to the legal framework, and a more effective criminal justice system, in turn, can better respond to corrupt practices, as outlined in the milestones shown in the box above. To this end, grantees have sought consideration of state-level ACJ laws that include the ACJA's four essential anticorruption elements. Grantees work to advance implementation of these laws everywhere by strengthening judges' and prosecutors' capacity to try cases according to ACJA standards, and playing a critical "voice" role by monitoring ACJA compliance, including in the courtroom. Alongside the system-strengthening work focused on the ACJA architecture, grantees also provide technical support to anticorruption agencies in developing and enforcing complementary laws, policies, and practices that directly target corruption through the criminal justice system.

As of January 2020, the MacArthur Foundation has made 14 grants totaling \$10 million to nine CSOs through On Nigeria's Criminal Justice module. These figures include On Nigeria's first grant in June 2015, which provided support to the Presidential Advisory Committee Against Corruption (PACAC), among other government agencies and CSOs. Grantees, with the exception of this first grant, began their initial On Nigeria activities between January 2016 and August 2017. Seventy-five (75) percent of approved funds have been paid. The timing of the launch of the Criminal Justice module means it has had approximately 4 years to make progress, placing it at the longer end of the spectrum for On Nigeria's five modules. Additionally, the MacArthur Foundation's previous human rights portfolio in Nigeria (initiated in 2000) supported criminal justice system reform, including advocating for adoption of the ACJA from 2006 until its passage in 2015. On Nigeria's Criminal Justice module built on these earlier efforts and included four experienced grantees from the human rights portfolio.¹⁵

¹⁵ These grantees are Legal Defence and Assistance Project, Centre for Socio-Legal Studies, CLEEN Foundation, and Nigerian Bar Association.

Progress related to harmonization of the criminal justice system through state-level adoption of ACJ laws has been substantial, with On Nigeria's efforts contributing to an increase in the number of states that adopted a state ACJ law from 3 in 2015 to 29 by 2019; all of these laws have included the majority of the essential, unifying, and progressive elements, although most state laws leave some gaps around these elements. At present, only 7 of Nigeria's 36 states remain to adopt an ACJ law, and of these, 4 have a draft bill under consideration (**Exhibit 52**). "Voice" actors actively monitor ACJ compliance through courtroom observations (**Exhibit 53**), while the federal government and some states are beginning to monitor compliance with ACJ laws through monitoring committees that include civil society (**Exhibit 54**). The federal government continues to adopt and implement complementary anticorruption laws and policies linked to criminal justice (**Exhibit 55, Exhibit 56**).

Evidence of how these laws play out in the courts is still limited. However, there are early indications of criminal cases in general being prosecuted more rapidly in Ondo, and to a lesser extent Lagos (**Exhibit 57**). There is also some emerging evidence that corruption-related cases are prosecuted more rapidly and fairly, including resolution of a number of high-profile corruption cases. Meanwhile, the courts have upheld critical ACJA anticorruption aspects in rulings in litigation that tested those aspects, and grantees have been parties to some of the most notable cases.

There is evidence of On Nigeria's contribution. Grantees have advocated for state-level ACJ laws, educated legislatures on ACJ principles in response to requests, and are key civil society partners in compliance monitoring; some evidence further suggests that laws are of higher quality as a result of grantees' work. Grantees and other organizations provide training and promote awareness on the ACJA for public, media, and criminal justice actors, and there is some evidence of increased knowledge and skills among legal practitioners (**Exhibit 58**). There is also corroboration that grantees work to integrate sensitization and learning into mandatory legal training curricula through the inclusion of grantee-produced ACJA training manuals into Continuing Legal Education (CLE) curriculum, as well as facilitation of ACJA learning through the development of a nationwide CLE e-Learning system. Further, there is evidence that On Nigeria has contributed to the progress in complementary laws and policies, most notably the recent rules for Federal Capital Territory High Court; for other complementary laws, evidence is not conclusive as to whether progress is contextual or has benefited from On Nigeria's contribution.

What On Nigeria hoped to achieve in Criminal Justice by 2020

(1) early indications that corruption-related cases are prosecuted more rapidly and fairly (including resolution of a number of high-profile corruption cases); (2) more state assemblies consider adopting an ACJ state law (evidenced in debate and consideration in their legislatures); (3) an increasing number of states implement an ACJ state law with the essential, unifying, and progressive elements; (4) more judges, legislators, and legal practitioners are trained in and adhere to ACJA standards; and (5) courts uphold critical ACJA anticorruption aspects in strategic litigation that tests those aspects

Exhibit 9 visually summarizes the extent of progress for all Criminal Justice outcomes and impacts, based on measures outlined in **Annex 2**. This snapshot illustrates substantial progress at all levels of the theory of change other than impact (where robust data are not available), including in long-term outcomes. On Nigeria has fully reached three of its 2020 success outcomes and appears on track toward the remaining two.¹⁶ While there is still significant path to walk to full and effective implementation of both the federal- and state-level ACJ laws, this progress suggests substantial momentum toward module-level long-term outcomes and a clear line of sight to module-level impact.

Exhibit 9: Criminal Justice level of progress related to outcomes and impacts

Level of Theory of Change	Progress on Criminal Justice Outcomes (numbers represent outcome numbers as seen in Annex 2)				
	1	2	3	4	5
Interim – Skill Building	1	2	3	4	5
Interim – Collaboration	6	7	8		
Interim – “Voice”	9	10	11	12	
Interim – “Teeth”	13	14	15		
Long-Term Outcomes	16	17			
Impact	18				

Substantial progress: Clear signs of movement since the beginning of On Nigeria
Moderate progress: Some momentum visible since the beginning of On Nigeria
No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
Unable to measure change from previous periods (data not available)
No primary data collected specifically for this outcome
No outcome

The assumptions undergirding the Criminal Justice module theory of change mostly hold, shedding light on the context that has underpinned this progress (**Exhibit 59**). Legislative bodies request CSOs’ technical assistance and support, and other partners support complementary aspects of the criminal justice system. Assumptions related to states adopting ACL laws with all the essential elements and the federal government passing other criminal justice-related anticorruption laws hold only in part.

The passage of the ACJA in 2015 provided a window of opportunity for further harmonization of the criminal justice system in Nigeria. Within the criminal justice system, there is a continuing strong momentum related to expansion and implementation of the ACJ laws at federal and state levels, and to date, the courts have upheld the law. Of the seven states still without an adopted ACJ law, only three do not have a draft bill under consideration. However, these landmark laws, both federal and state, are encountering resistance from those who benefit from the status quo. The largest inhibitor in the present landscape is resource limitations, which continue to hamper full implementation. There are large backlogs in Nigeria’s understaffed courts, and key criminal justice actors outside courts lack the resources and capacity needed to implement other provisions of the ACJA in full.

¹⁶ The recent surge of states that have adopted an ACJ law means that many states have just gotten to the inception stage of implementation.

Corruption within the criminal justice sector itself remains a key contextual factor that is unchanged since the strategy's inception.

Learning to date in the Criminal Justice module suggests that the theory of change provides a valid pathway to changing the legal framework under the condition of a broad appetite for reform and a robust civil society that shares a common focus on the legal priorities. Strong progress in this module may reaffirm learning from HGSF regarding the importance of identifying areas of intervention that meet a certain threshold of political will to reform. The progress in Criminal Justice module has been achieved through “voice” tactics by civil society grantees pressuring “teeth” actors to change laws, which shows that changing “teeth” systems does not necessarily require granting to “teeth” actors (although granting to “teeth” actors has proven beneficial, as evidenced in the UBEC module). The module further demonstrates that the MacArthur Foundation can make progress in a wide number of states simultaneously when there is a clear federal model to build on.

At the same time, On Nigeria's ability to support simultaneous implementation in a correspondingly large number of states remains less tested, and will be an important area of learning in the future. Given the scale of the sector and general level of rule of law in Nigeria, achieving consistent (universal) implementation is also an enormous task. Consequently, the strategy would benefit from specificity in defining what implementation looks like in practical terms. Given the extent and rapid pace of progress in legal reform in recent years, this attention to implementation should include a focus on institutionalization to consolidate these gains for sustainability. The size of the sector also points to the need to develop spread strategies for courtroom monitoring and skill-building activities, which would provide a clearer line of sight to achieving sustainable national impact beyond court rooms and training participants who directly benefit from grantees' activities.

Now that ACJ adoption has been secured in most states, the timing appears appropriate to revisit the module's bounds as states and the Federal Capital Territory move into ACJ law implementation. While the connection between the Criminal Justice module-level outcomes and impacts and the overall goal of reducing corruption is clear, further defining these boundaries would strengthen the causal logic from module-level change to national-level reductions in corruption. At present, for example, grantees' courtroom monitoring of ACJA implementation includes all types of criminal cases and is not focused on corruption trials. Finally, while future On Nigeria focus might be more on implementation and legal aspects more narrowly related to corruption, there are still some gaps in state ACJ laws, particularly among the states that passed the laws earlier. Making explicit On Nigeria's tactics for helping address those gaps is important to continue harmonizing and ensure a common state-level framework that minimizes loopholes, and ensures the full weight of ACJ laws to impede corrupt actors from avoiding punishment. While spread has been mostly achieved for the state ACJ law adoption, it will be important to include tactics for spread of best practices related to ACJ law implementation.



Media and Journalism Field

Nigeria has a vibrant media ecosystem. It includes public and commercial media, and a nascent but growing independent media whose history is inextricably tied to political struggle. There are more than 100 locally and nationally distributed news publications, with the most powerful being privately owned.¹⁷ While the Constitution of Nigeria guarantees freedom of expression and the rights of the press to “uphold the responsibility and accountability” of government, the media’s capacity to serve as a watchdog and create a truly free press in Nigeria is still limited, hindered in part by political and business conflicts of interest by media owners themselves.¹⁸ The rise of social media and digital technologies, especially the dramatic growth of smartphone use—from 23 million smartphones in 2015 to 53 million smartphone connections in 2018¹⁹—has created new distribution channels that are only beginning to be explored. Digital platforms allow new independent media outlets to operate at the lower costs of online publishing.

On Nigeria’s work in media and journalism has sought to demonstrate that skill building for the field could increase the quantity and quality of corruption-focused reporting, and that media reporting could stimulate positive action by “teeth” actors. This work emphasizes the media’s key role in the creation and amplification of content related to corruption issues and anticorruption efforts in On Nigeria’s other modules and more broadly. On Nigeria focuses on strengthening “voice” by increasing independent, data-driven journalism, including high-quality investigative journalism and local language reporting, as outlined in the milestones shown in the box on the right. Grantees seek to do this by building journalists’ capacity through training and hands-on learning and mentorship opportunities, and providing funds and competitions to support and expand investigative reporting. Activities also seek to foster collaboration between civil society and the media to create a virtuous cycle where (1) the media investigate and report on wrongdoing (discovered either through independent inquiry or tip-offs by CSOs and whistleblowers), while (2) civil society takes up those reports by advocating for “teeth” actors to play their role, and (3) media report on CSOs’

What On Nigeria hoped to achieve in Media and Journalism by 2020

(1) more journalists trained in investigative reporting and capable of writing about education, electricity, and anticorruption, transparency, and accountability; (2) more journalists conducting, and media houses supporting, high-quality, data-driven investigative reporting; (3) more corruption-related reporting in local language media; and (4) civil society using investigative reporting to put pressure on government and private-sector actors to take action on corruption, transparency, and accountability; success will also mean government officials take action in response to media coverage related to corruption issues and subsequent CSO pressure

¹⁷ Freedom House. *Freedom of the Press Nigeria Report: 2015*.

¹⁸ The Paris-based *Reporters Without Borders*’ annual freedom index ranked Nigeria’s press 111 out of 180 countries, and the U.S.-based organization *Freedom House* deemed the Nigerian media only “partially free.”

¹⁹ For 2015 figures, see: *IT Pulse. Nigeria ranked 17th in global smartphone use*. June 4, 2015. For 2018 figures, see: *GSMA. Spotlight on Nigeria: Delivering a digital future*. February 2019.

anticorruption wins, amplifying them to contribute to changing social norms. Finally, On Nigeria grantees and non-grantmaking work have explored business models that can support the sustainability of independent media.

As of January 2020, On Nigeria’s Media and Journalism portfolio includes 29 grants totaling \$15.3 million to 18 organizations. Of these, seven are independent media outlets, eight are organizations that support the media, and three are outlets focused on reporting in Nigerian languages. The grants to the independent media outlets and organizations that support the media are national in their focus, while the grants to the Nigerian language outlets are centered on specific languages rather than target geographies. The majority (nine) of these organizations began funded activities in January 2017; the three focused on content in Nigerian languages began work in October 2018. To date, 49 percent of approved funds have been paid; this statistic is lower than other modules because it includes the recent round of renewal grants.

On Nigeria’s efforts in media and journalism inherently focus on the “voice” side of the sandwich, where there has been strong progress in the production of corruption and anticorruption reporting. The reporting has increased in volume, which has been sustained at a higher level in 2019 than at any time since 2016 (**Exhibit 60**). The volume of investigative reporting by grantee media outlets has grown substantially from 2016 to 2018; while it started from an extremely low baseline, this movement provides a critical “proof of concept” regarding the MacArthur Foundation’s ability to generate traction in the media and journalism field (**Exhibit 61**). On Nigeria has used two primary tactics to support reporting: direct funding to media outlets and training by grantee organizations that support the media (but do not directly produce it). Almost all investigative reporting—and all high-quality reporting—has been produced by On Nigeria *media outlet* grantees, which clearly indicates the MacArthur Foundation’s contribution to this progress. Grantees have also trained a substantial number of journalists in investigative techniques, and to report on education, electricity, anticorruption, transparency, and accountability. However, evidence does not show direct results of these training activities—substantially less quality investigative reporting has been produced by individuals grantees *trained*. This evidence suggests that the most efficient tactic to support quality investigative journalism may be directing funding to outlets, a setting where journalists have organizational support beyond training. There is evidence of government officials and private-sector actors taking some actions in direct response to corruption-related media coverage, particularly since 2017; however, the responses were not always positive (**Exhibit 62**).

Collaboration between On Nigeria civil society and media organizations includes training, CSO amplification of media reports, and collaboration on corruption-related reporting. Evidence shows collaboration between media and grantees has increased since the beginning of On Nigeria (**Exhibit 11**), but varies across modules—robust activity with Criminal Justice grantees, increasing activity with UBEC and Electricity in 2018, and limited activity with HGSP (**Exhibit 20**). For the media’s collaboration with civil society more broadly (beyond On Nigeria grantees), evidence indicates that it is largely limited to skill building. The observation that collaboration is the strongest among organizations that are On Nigeria grantees points to the MacArthur Foundation’s contributions and

the convening role it has played. Grantees from all modules also use social media to push out corruption and anticorruption content.

A stable majority of citizens consider radio, television, newspapers, and social media to effectively cover issues to combat corruption (**Exhibit 64**). However, the majority of news stories relate to corrupt acts, (**Exhibit 12**) and available evidence does not show any increase in citizens’ awareness of anticorruption success stories (**Exhibit 63**). While On Nigeria grantees invest in their organizational capacity, evidence does not yet suggest other organizations make comparable investments, which means that changes in this module’s impact measure have yet to begin.

Exhibit 10 visually summarizes the extent of progress for all Media and Journalism outcomes and impacts, based on measures outlined in **Annex 2**. This snapshot illustrates substantial progress in “voice” and “teeth” (responsiveness to media reporting), and moderate progress in skill building and collaboration. On Nigeria is on track for all five milestones it set for 2020, with the exception of the local language reporting, where grants are too recent for robust evaluation to enable a determination. Even though outcome evidence from these grants is not yet available, it is not clear whether these grants align with the milestone’s goal to increase reporting: of the three grants, one produces dramas and another holds call-in shows; only one grantee’s proposal described producing reporting. Revision to the theory of change—or clarification from the next round of data collection regarding grantees’ activities—can ensure that activities align to intended outcomes.

Overall, this progress suggests both traction and momentum for interim outcomes, and for continued increases in investigative journalism quantity and quality. However, long-term outcomes and impact do not yet show progress, and the connections between media activity at the interim outcome level and citizens’ perceptions at the long-term outcome level are not obvious based on progress to date. Similarly, there is not a clear causal link to the impact-level change of media organizations that make the investments needed to institutionalize investigative reporting and its sustainability in Nigeria’s media market. This suggests that there is not a line of sight to long-term outcomes and impacts as currently formulated in the theory of change, but that this is less a matter of generating progress and more that of conceptualizing how causal linkages will unfold to produce change over the long run.

Exhibit 10: Media and Journalism level of progress related to outcomes and impacts

Level of Theory of Change	Progress on Media and Journalism Outcomes (numbers represent outcome numbers as seen in Annex 2)		
Interim – Skill Building	1	2	3
Interim – Collaboration	4		
Interim – “Voice”	5	6	7
Interim – “Teeth”	8		
Long-Term Outcomes	9	10	
Impact	11	12	

- # Substantial progress: Clear signs of movement since the beginning of On Nigeria
- # Moderate progress: Some momentum visible since the beginning of On Nigeria
- # No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- # Unable to measure change from previous periods (data not available)
- # No primary data collected specifically for this outcome
- No outcome

The assumptions related to the external context and causal links mostly hold for the Media and Journalism module theory of change (**Exhibit 65**). Citizens appear interested in reporting on corruption and anticorruption actions, and they have access to On Nigeria-supported media. However, independent media houses have limited organizational and financial capacity for sustainable data-driven investigative reporting.

In the media and journalism field, the enabling conditions for continued advancement of stronger investigative journalism to expose corruption and amplify anticorruption efforts appear somewhat mixed. Citizens' readiness to engage in media for social change appears high, while media outlets' resources to independently increase investigative reporting of corruption-related issues remain limited (for both salaries and investigation expenses). This occurs in a context that poses a highly challenging operating environment to journalists due to the ability to access needed information, as well as direct physical danger. The lack of consistent response to Freedom of Information Act requests, and the use of the Cyber Crime Act and other forms of intimidation reduce freedom of press, contributing to assessments that the media in Nigeria are only "partly free."²⁰ At the same time, there is substantial energy to support the sector, with other donors assisting with skill building in the media and journalism field. Despite the context's challenges, On Nigeria has shown that its direct support to the sector can produce substantive reporting on topics that are central to the anticorruption movement. This suggests that progress might remain possible even in the absence of viable business models for data-driven, investigative journalism in Nigeria, but it could remain dependent on continuing support.

Learning to date in the Media and Journalism module suggests that the theory of change provides a valid pathway to increasing the quantity and quality of reporting on corruption issues. There is hunger for and a need to strengthen collaboration with other parts of the strategy, especially in telling the anticorruption success stories that represent prevention efforts. In addition, the pathway to long-term outcomes among citizens and impact within the media and journalism field broadly need to be better articulated. More fundamentally, the module's impact-level goal of a self-sustaining independent media sector may need revisiting, in light of the Nigerian context and even global trends surrounding media independence and sustainability. The media and journalism impacts aside, in its first 3 years, the MacArthur Foundation has demonstrated that traction in its Media and Journalism module can immediately support On Nigeria's other modules and ultimate goal of reducing corruption, at the same time as it works to strengthen collaboration with other parts of the strategy and on longer term tactics to support the health of the field.

These lessons from On Nigeria's initial period suggest that the Media and Journalism strategy—and its theory of change—might need to look somewhat different from other modules. While Media and Journalism work clearly supports the sandwich dynamics of other modules and On Nigeria overall, and while specific pieces of reporting elicit "teeth" responses reflective of sandwich dynamics, the module itself also requires changes broader than the accountability processes depicted by the sandwich. Learning also suggests that the Media and Journalism module tackles a series of issues

²⁰ Source: Freedom House (2017).

that operate on very different timelines, which indicates that the theory of change may benefit from teasing out distinct timelines for three different aspects: (1) direct support for data-driven and investigative journalism; (2) investing in the future generation of journalists; and (3) development of business models that would make independent journalism in Nigeria self-sustaining. This learning could also prove useful in the future if the MacArthur Foundation enters into systems-level work in new fields.

Cross-Cutting Areas

In addition to the five modules, On Nigeria includes cross-cutting actions that reinforce and transcend the individual modules to expand the number of anticorruption champions, shift social norms and behaviors, and support the government’s ability to confront corruption broadly. This cross-cutting work includes three different areas of action: (1) civil society efforts in areas that are not module-specific to build pressure for accountability and influence government policies, (2) changing social norms related to corruption through faith-based and entertainment behavior change campaigns, and (3) support to keep corruption-related issues on the election agenda.

As of January 2020, the MacArthur Foundation had made 55 cross-cutting grants totaling \$26.3 million to 44 organizations through On Nigeria. The first grants began funded activities in August 2016, with new granting continuing in the 3 years since to explore the different areas represented under cross-cutting activities. Of the 55 cross-cutting grants, 34 correspond to the civil society area and represent \$8 million of funding; the first of these grants began in August 2016, with grants made to new organizations on an ongoing basis through September 2019. There are 15 behavior change grants, which represent \$8.9 million in funding; they all began between October 2017 and January 2018, with the exception of three grants to international organizations that support Nigerian grantees.²¹ There are four elections grantees, which represent \$4.7 million in funding; these grants had funded activity start dates in July 2018, but grantees reported only beginning activities in January 2019. To date, 68 percent of approved cross-cutting funds have been paid.

In 2018, On Nigeria adjusted the theory of change to explicitly include “voice” and “teeth” interim outcomes for the cross-cutting areas at the strategy level. Generally, cross-cutting work contributed to the strategy’s existing long-term outcomes and impacts, with one long-term outcome and one impact added in 2018. However, these three cross-cutting areas were not conceived as separate modules and, thus, do not currently have complete theories of change or full measurement frameworks. Because of the timing of the addition of cross-cutting outcomes, the first round of data collection against these outcomes only occurred in 2019. It is, therefore, not possible to draw the same kinds of conclusions as for the strategy’s five modules. Nonetheless, the following early signs of progress emerge based on 2019 data.

Civil society for government accountability: Cross-cutting CSO grantees engage a wide range of citizens in anticorruption efforts, bringing issues of corruption to light and holding government accountable. A notable example of On Nigeria’s contribution is through one grantee’s 2017 freedom

²¹ Behavioral Insights, Inc., Chatham House, and Harvard University Kennedy School of Government.

of information lawsuit that compelled the federal government to release the names of looters, which led to a subsequent spate of media reports naming culprits. The government of Nigeria is also making some progress on implementation of the National Action Plan for Combatting Corruption and National Anti-Corruption Strategy, with some states signing on to the Open Government Partnership (**Exhibit 13**). A number of laws and executive orders have been put in place to address corruption, including a law creating the Nigerian Financial Intelligence Unit; an executive order on Preservation of Suspicious Assets Connected with Corruption; and the Mutual Assistance in Criminal Matters law. Other initiatives to combat corruption, including the creation of a Federal Audit Service Commission and the Proceeds of Crime Bill, have been passed by the National Assembly, but have not yet been signed by President Buhari (**Exhibit 55**). Evaluation evidence is not clear regarding the extent to which this progress is contextual rather than something On Nigeria has contributed to.

Behavior change: “Voice” actors in entertainment have achieved broad reach with a range of anticorruption content, distributing this content through media channels that have audiences in the tens of millions (**Exhibit 14**). There is early evidence from certain grantees that some of this content influences viewers’ knowledge and intentions, but it is too soon to determine what influence it might have on behaviors.²² While On Nigeria has engaged many faith-based actors, there is limited evidence to date of these actors’ follow-on reach in their communities. The actors grantees engaged directly have been responsive to information content grantees produce, but there is not yet evidence regarding how this content influences knowledge and attitudes, let alone behaviors.

Elections: CSOs, women’s groups, youth, and social influencers raised public awareness about candidates’ commitments during Nigeria’s elections in February and March 2019. However, this set of grants (with 41 sub-grantees) only started activities in late 2018 to early 2019, and there is limited evidence of their actions at state level and after the elections. While social influencers have raised corruption issues in their public awareness campaigns since the elections, this content has not necessarily been explicitly linked to campaign promises. Anticorruption remained a central theme in President Buhari’s reelection campaign, but there is conflicting evidence about the adequacy of discussions and platforms related to transparency, accountability, and corruption. Grantees within this sub-cohort also reported conducting election monitoring and integrity work aligned to democratization support, but outside the intended scope of corruption-focused election work.

Lacking full-fledge, separate theories of change, these three cross-cutting areas do not have explicit assumptions independent of the strategy’s overall assumptions. In terms of windows of opportunity, the elections work was timed to begin with Nigeria’s 2019 federal and state elections, and to monitor election promises in the post-election period. The behavior change and CSO sub-cohorts tap into the broader anticorruption movement, a window that remains open (and growing, as discussed above).

Without robust data and full theories of change, it is not possible to assess the existence of a line of sight to impact in the same way as for the five modules. However, some tentative conclusions for this

²² An On Nigeria grantee conducted a baseline in November 2018 and will conduct a follow-up survey in 2020 that will provide data on changes in social norms.

work do emerge from engagement with grantees, lessons from other modules, and the limited evidence that is available (discussed above).

- It is difficult to measure work robustly without a full theory of change and corresponding set of measures, and it has been challenging for cross-cutting grantees to see how their work complements and supports other areas of the strategy, although this improved substantially after the summer 2018 introduction of dedicated cross-cutting outcomes.
- The elections grantees reveal the additional complexity of managing and measuring work of areas that rely heavily on sub-grantees, as all four of the elections grants do. While not the only On Nigeria grants with sub-grantees, the elections work is the only area where all grants have sub-grants. More data collection or reflection would be needed to better distill the specific challenges and bring forth best practices for managing grants with sub-grants, but this learning could be valuable for future work in Nigeria.
- Even without multiple rounds of evidence pertaining to the behavior change work, learning from the sectoral modules and review of the behavior change outcomes at the strategy-level of the theory of change show that the strategy might need revision—or at least specification—to develop tactics to spread change nationally. The entertainment and faith-based work represents two different models for behavior change interventions, and will likely spread through different mechanisms. Developing this spread strategy may involve articulating a hypothesis, which could be tested through future measurement.

Finally, as with other areas of the strategy that dealing with “teeth” systems, the civil society and government accountability work is now at a key moment of transition. Several laws and policies have been adopted and will now need to be implemented universally to systematically confront corruption. At the same time, prioritization of remaining gaps will help clarify the most important areas for policy advocacy to focus on in the next phase. While there is anecdotal evidence that these laws and policies are leveraged to confront corruption starting in the first Buhari administration, more systematic and transparent government monitoring of implementation would enable better public understanding of the current anticorruption movement’s successes and challenges. Support for such monitoring systems could be an area for future work by cross-cutting grantees.

LEARNING AND CONCLUSION

Learning and Known Unknowns

As the MacArthur Foundation pauses to reflect on whether and how to continue work in the Nigerian anticorruption space, several key learning and insight points emerge from the evaluation and learning evidence. In many cases, the learning may not point to specific solutions, but to a gap, where it will be necessary to bring in experience from the broader anticorruption field in other contexts, alongside evidence from On Nigeria.

The most important gap in the strategy to date is the articulation of how the different modules should complement each other and ultimately, contribute to the overarching goal of reducing corruption in Nigeria. At the time of the initial strategy and theory of change development, a conceptual sense of complementarity existed, but the different timelines for each module did not facilitate significant interactions. Consistent with the “design-build” approach, each module was in its own proving ground stage in these early years, and the most fruitful areas of complementarity between modules could not be predicted while On Nigeria was still learning how to generate initial traction in a variety of sectors and systems. As an example, the time needed to move from passage to implementation of state ACJ laws meant that these laws’ impacts on other modules’ efforts would not be felt in the first 3 years. Now, however, articulating and leveraging these linkages is necessary to develop a clearer line of sight and a stronger national, collective impact across sectors. Defining complementarity between modules and the pathways to the national impact will necessarily look differently for systems and sectoral modules. Each module cohort already has touch points for collaborating with the media and journalism field, and while evidence indicates room for strengthening this collaboration, the links between the media and anticorruption actors in civil society and the government are clearly articulated in the theory of change; so too is the way the Media and Journalism outcomes and impacts support On Nigeria’s ultimate goal. There is also a clear theoretical link to On Nigeria’s overall goal between the work of the Criminal Justice and cross-cutting civil society cohorts, but how this systems-level work can directly support work in other modules is not yet explicit.

Each of the three sectoral modules has shown promising models for engaging citizens in anticorruption work through community monitoring, as well as promise for increasing transparency and accountability within its sector, albeit with varying degrees of progress, as summarized above. As they tested different tactics and entry points, and focused on a specific aspect of service in that sector, each module and its cohort of grantees have operated in somewhat of a silo. On Nigeria is now at a point where the learning about these models can be transformed into an explicit strategy that will leverage these pockets of success and provide a clearer line of sight to reducing corruption nationally, across all sectors. As a group, these modules have demonstrated that citizens can effectively engage transparency, accountability, and anticorruption mechanisms around issues they face every day, which points to a tangible toehold for engaging rank and file Nigerians in concrete action against corruption. Meanwhile, “teeth” work has revealed several promising corruption-prevention systems that could be spread to other service delivery sectors to narrow the space for

corruption. As a grantmaking strategy, the UBEC and Electricity modules both show that granting to “teeth” actors can be an effective way to facilitate the adoption and implementation of corruption-prevention systems, while HGSF shows that when there is sufficient political will, civil society can influence corruption prevention systems through technical support and advocacy to government actors (without granting directly to a “teeth” actor).

The civil society and government accountability grantees already work with corruption-prevention systems (e.g., state participation in the Open Government Partnership and its commitment to OCDS), and could take up some of the successful systems from the sectoral modules. Building out the strategy for these cross-cutting cohorts into a fully-fledged module (or modules) with a theory of change would facilitate this leverage and collaboration by articulating a more explicit pathway toward On Nigeria’s ultimate goal. The behavior change work would also merit a full theory of change with explicit assumptions to help specify how the interventions grantees implement will spread to national changes in norms and the conditions that need to hold to make progress. Given the recent start-up of the elections grants, more evidence is needed to derive learning, but implementation evidence indicates it is important to revisit the strategy for this cohort to clarify the goals, gather more evidence, and consider how it can be leveraged more strategically in the post-election period that remains in the current grants.

In addition to the three sectoral modules’ contribution to On Nigeria’s overall goal, the strategy to consolidate gains within these modules to achieve module-level impacts also needs further articulation. For its “teeth” work, in its next phase, On Nigeria will face a new task of supporting institutionalization of nascent anticorruption systems in target states and federally to ensure sustainability. It will also need to find ways to work with more states to support spread of successful state-level systems to non-target states. For “voice” work, it is clear that the MacArthur Foundation cannot support spread to non-target areas by directly funding community monitoring everywhere. Therefore, it will need to find other avenues to spread “voice” work; this may include identifying alternative approaches for civil society grantees to support community-based organizations, developing new “voice” tactics in addition to community monitoring, and broadening the variety of “voice” actors. Ultimately, the necessary level of “voice” action to prevent and root out corruption nationally in these three modules is unknown and could be an area for future learning.

The third key learning is the strong, but challenging need to find ways to communicate anticorruption successes compellingly and more widely. Anticorruption successes do not have the same visibility and splash as results of the criminal justice system punishing corruption; it is much harder to tell the story of direct payment systems or continuous audits that prevent corruption from occurring. However, knowledge of these successes is a key part of the strategy for changing perceptions and influencing social norms. Evidence to date shows that media coverage has focused more on instances of corruption than examples of preventing it, and the field could benefit from more explicit tactics that support this kind of storytelling. Success in HGSF, where corruption appears to have thus far largely been prevented, may provide a testing ground to develop such tactics.

Finally, the anticorruption literature is clear that punishing corruption alone is insufficient to reduce it sustainably; prevention systems are also critical. Success stories around both punishment and

prevention interact to influence social norms and behaviors gradually, in ways that sustain corruption reductions.²³ The theoretical underpinning of On Nigeria’s current cross-cutting work for behavior change already exists, and while On Nigeria’s investments are too new to assess its results, it is an important part of any comprehensive anticorruption strategy and should remain in the future. At the same time, there is still significant learning to be created and promising behavior change tactics could be incorporated into sectoral work in the future.

Stepping back to consider lessons learned from the landscape, it is not possible to know the consequences for the MacArthur Foundation’s ability to maintain traction in this field if some or many of the windows of opportunity were to close suddenly. However, as Nigeria’s anticorruption movement has evolved since 2015, so too have these windows. Three important implications stand out as important trends to watch in the years ahead.

First, corruption appears to have receded slightly from Nigerian citizens’ most important priority in 2015 back to a more historically normal level of one of their top three priorities. For the government, meanwhile, the anticorruption drive remains unchanged as a pillar of the administration’s platform (as witnessed during the 2019 election campaigns). To date, this move does not appear at odds with On Nigeria’s ability to make progress and maintain momentum. Second, certain anti-democratic tendencies in the current government, represented by recent moves against the media and continuing flirtation with actions to limit civil society space, could restrict the ability of On Nigeria’s partners to operate safely and effectively. These tendencies are worrisome for society, but have not yet impeded On Nigeria; if they accelerate, they might create opportunity for parallel strategies to keep the spaces open and make the MacArthur Foundation’s role even more important. Finally, the continuing maturation of the anticorruption agenda from a priority point in a single presidential candidate’s platform to a movement may have further opened the window of opportunity On Nigeria initially seized to enter in 2015. While there is not yet a self-sustaining, resilient accountability ecosystem, the diversity of actors, connections, and alliances within the network, and increasing variety of tactics these actors use all suggest a more robust and dynamic movement that extends well beyond the leadership of President Buhari.

Conclusions

As presently formulated, On Nigeria’s ultimate goal aspires to a lasting reduction in corruption at the national level. In its first 3 years, On Nigeria has sought to understand whether, how, and under what circumstances the MacArthur Foundation can contribute to progress in support of that goal.

In its first 3 years, On Nigeria has demonstrated progress in an area that is of particular concern for Nigeria’s future. The strategy seizes upon a unique moment in time in Nigeria’s democratic transformation, which began when corruption rose to the top of the agenda, and is now garnering

²³ Lohsen, A. 2015. *Evidence-based Approaches to Reducing Corruption: A review of academic literature for the MacArthur Foundation*; Jennett, Victoria. 2006. *Categorization of Anti-Corruption Interventions*. U4 Expert Answer. N.p., 25. The MacArthur Foundation’s recent *Political Economy Analysis* commissioned for On Nigeria also reinforced the point that punishing corruption cannot alone reduce it.

sustained action and attention. On Nigeria has confronted this challenge in a way that builds on the MacArthur Foundation's existing strengths, relationships, and previous work in Nigeria.

The discussion above indicates that On Nigeria has been able to effect progress at the interim outcome level and generate momentum toward long-term outcomes in most of those geographies, sectors, and systems where the MacArthur Foundation directly funds interventions. While On Nigeria has not yet reached all its 2020 milestones in each area of work, progress toward the majority provides an initial proof of concept that the MacArthur Foundation can effectively contribute to Nigerian efforts to increase transparency, accountability, and reduce corruption.

On Nigeria has achieved these results by aligning tactics with the four approaches of skill building, collaboration, "voice," and "teeth," showing that the sandwich strategy is a viable model for the MacArthur Foundation to effect change. Progress toward the 2020 milestones across the modules indicates the sandwich strategy's capacity to be tailored for a variety of Nigerian sectors and systems. Taken together, advancement through these tactics toward the 2020 milestones validates the theory of change's underlying causal logic for interim and long-term outcomes in targeted sectors and geographies. This does not confirm, however, the validity of the theory of change for specific modules where the assumptions do not hold and for the overall theory of change to achieve the next stage of progress: national impact. One should not expect national-level impact at this stage of On Nigeria, and the evidence confirms that 3 years is not a sufficient time frame to reduce corruption in Nigeria. Yet, the validation of the basic causal logic does indicate there is a potential line of sight to impacts within the HGSF and Criminal Justice, and to a lesser extent, within the Media and Journalism and UBEC modules; still, Media and Journalism work has made unambiguous contributions to interim outcomes that support the broader strategy's impact. The learning above summarizes modifications to the strategy that could strengthen this line of sight.

Analyzing progress in the context of the evolving landscape sheds light on the circumstances under which the MacArthur Foundation can contribute to corruption reductions. Most importantly, evidence confirms that political prioritization of a government program (such as HGSF or UBEC) in general and political will for anticorruption reform in that program are particularly important for generating momentum in a 3-year time frame. On Nigeria's work in HGSF and passage of state ACJ laws aligned with strong political will and program prioritization, while the cross-cutting civil society work aligned with more general political will prioritizing the government's anticorruption fight; all showed strong progress toward long-term outcomes. The existence of this political will, however, is not a simple "yes/no" for success. Contextual challenges in the Electricity module clearly impeded progress and showed it is difficult to generate momentum if a sector's woes are extensive and reach far beyond the bounds of just corruption. Yet, "voice" progress in this module also indicates that even if corruption cannot be readily reduced, "voice" tactics could still provide a toehold for engaging citizens in anticorruption issues. The landscape in UBEC and Media and Journalism, at the same time, each lie somewhere between these two extremes, which shows that strategic engagement of influential actors can help catalyze progress in areas that are not top political priorities in the context of government's pursuing of a broad anticorruption agenda.

Importantly, citizens' attention to corruption issues underpins all progress to date, and has provided fertile ground for grantees to engage the Nigerian population in their activities. This points to broader windows of opportunity the MacArthur Foundation designed On Nigeria to take advantage of. Evidence suggests that these windows are still open for work on anticorruption—political will continues at federal level and in some states, and citizens and civil society still consider corruption a priority and are increasingly vocal about it. As is expected, vested interests create powerful forces resistant to reform, but the anticorruption movement offers multiple “voice” and “teeth” partners eager to confront anti-change forces.

There are still unknowns and questions to be answered, as the design-build process continues for On Nigeria. There remain questions related to how best to institutionalize and spread the “voice” and “teeth” efforts of On Nigeria's first phase. There are questions related to the breadth and depth of behavior change work needed to influence social norms, as well as how community engagement around a single issue will be broadened to a more expansive engagement across issues. The windows of opportunity also need to be monitored to ensure appropriate recalibration and adaptation of the strategy to changes in the context; three current trends to watch for are the prioritization of corruption moving toward the 2023 elections, the openness of the civil society and media space, and the evolution of the networks that comprise the accountability ecosystem.

Within the context of the current pause-and-reflect moment represented by the strategy review, the evaluation and learning evidence to date points to some recalibration of the current strategy. There is sufficient progress toward the initial milestones to suggest that this is a field where the MacArthur Foundation has traction, but also enough challenge to suggest that the strategy's current articulation is not wholly sufficient to achieve On Nigeria's ultimate goal. Coming after two rounds of evaluation data collection (2018 and 2019) and 3 years of implementation experience, this recalibration is timed to take advantage of substantial learning to address these opportunities based on experience and evidence. Ultimately, this initial progress has been achieved in an area of high priority for Nigerians, but it is still fragile and could easily be lost. With a longer term commitment, On Nigeria could consolidate its early gains to sustainably alter Nigeria's trajectory.

ANNEXES

Annex 1: Evaluation and Learning Evidence – Exhibits

Exhibit 11: Grantee mentions as percent of all media monitoring mentions (MJ 4.1)

Source(s): Media monitoring—conventional media

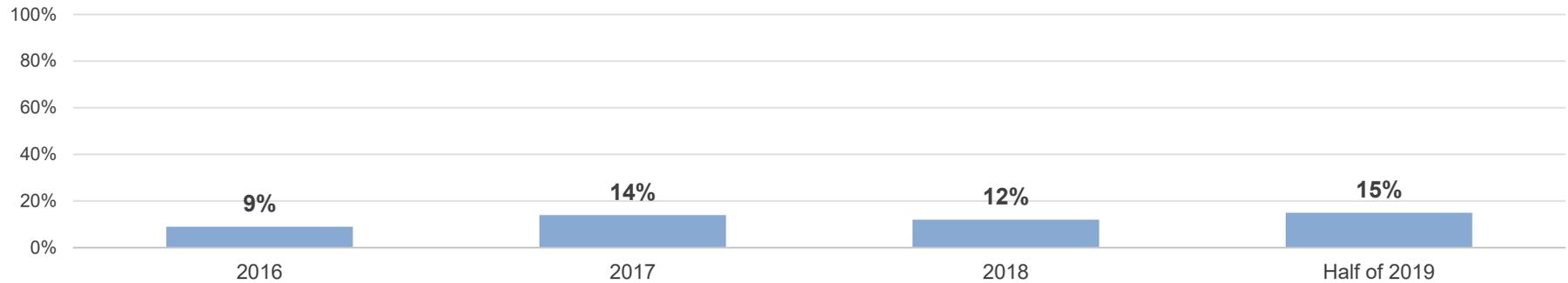


Exhibit 12: Extent of reporting that is focused on corrupt acts versus anticorruption successes (MJ 5.2)

Source(s): Media monitoring—conventional media

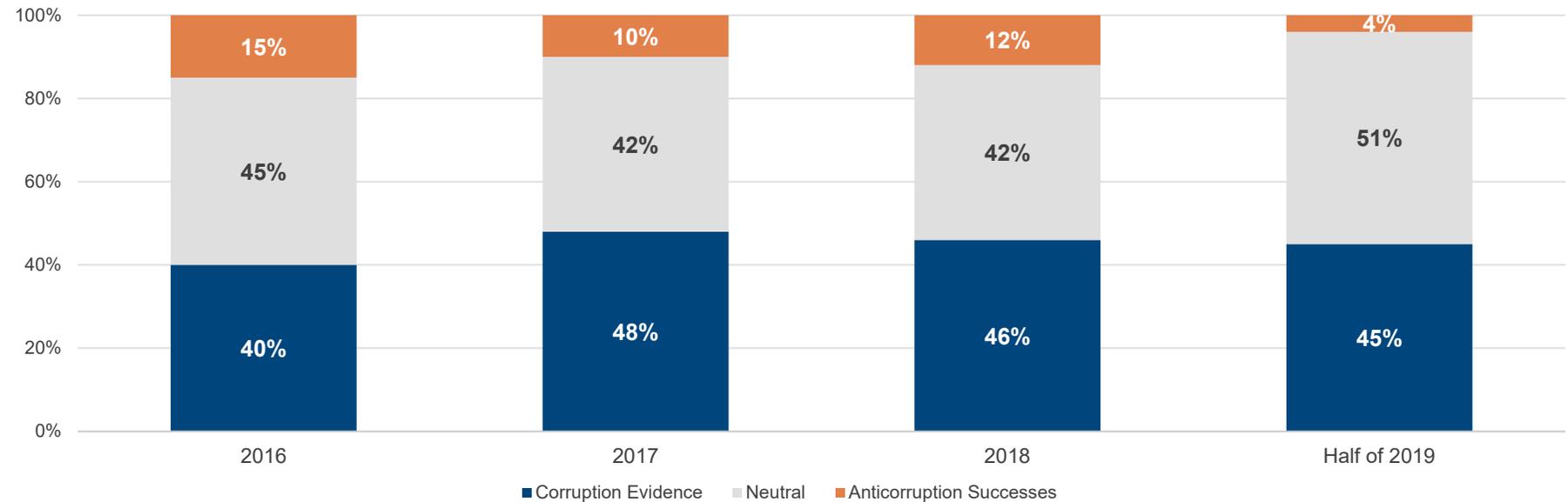


Exhibit 13: Government progress on anticorruption commitments (STRAT 7)

Source(s): Document review

Category of Commitments	Status			
	Not Started 	Ongoing 	Completed 	No Info
Beneficial Ownership Transparency	1	4		2
Preventing the facilitation of corruption		1		1
Public procurement and fiscal transparency		4		
Extractive industries		4		2
Tax transparency			3	
Preventing corrupt bidders from winning contracts	2			
Asset Recovery, Asset Return, and Transparent Management of Returned Assets		3		
Fostering Integrity in International Sports	1			
Promoting Integrity in Our Institutions	1	1		
Support Innovations in the Use of Technology to Fight Corruption		1		
Support to International System		2		

Numbers in circles refer to number of commitments assessed to be at each level

Source: ANEEJ. 2018. Implementation of London Anti-corruption Summit & GFAR commitments in Nigeria

Exhibit 14: Cross-cutting behavior change grantees' content dissemination (STRAT 5)

Source(s): Document review

Educational/Entertainment Content	Distributors' Audience
Radio Drama series in Hausa	25 million listeners
Video Vignettes on social media	2 million users
Edutainment skits*	70 million viewers

N.B. List is not comprehensive.

* Entertainment Grantees

Faith-based Content

50,000

pieces of advocacy material were distributed in the South-South and South-West zones to Christians and Muslims.

2,000

works by Islamic sheiks related to anticorruption issues translated and disseminated in Borno and Zamfara.

Over **350**

Pentecostal Christian leaders trained

Exhibit 15: Proportion of citizens in On Nigeria target states contacting the following to demand services (STRAT 12.1)²⁴

Source(s): EL Partner National Telephone Survey (2019)

Sample: 1,749

Over the past 12 months, how many times have you contacted one of the following groups or individuals to voice a grievance related to any type of corruption?

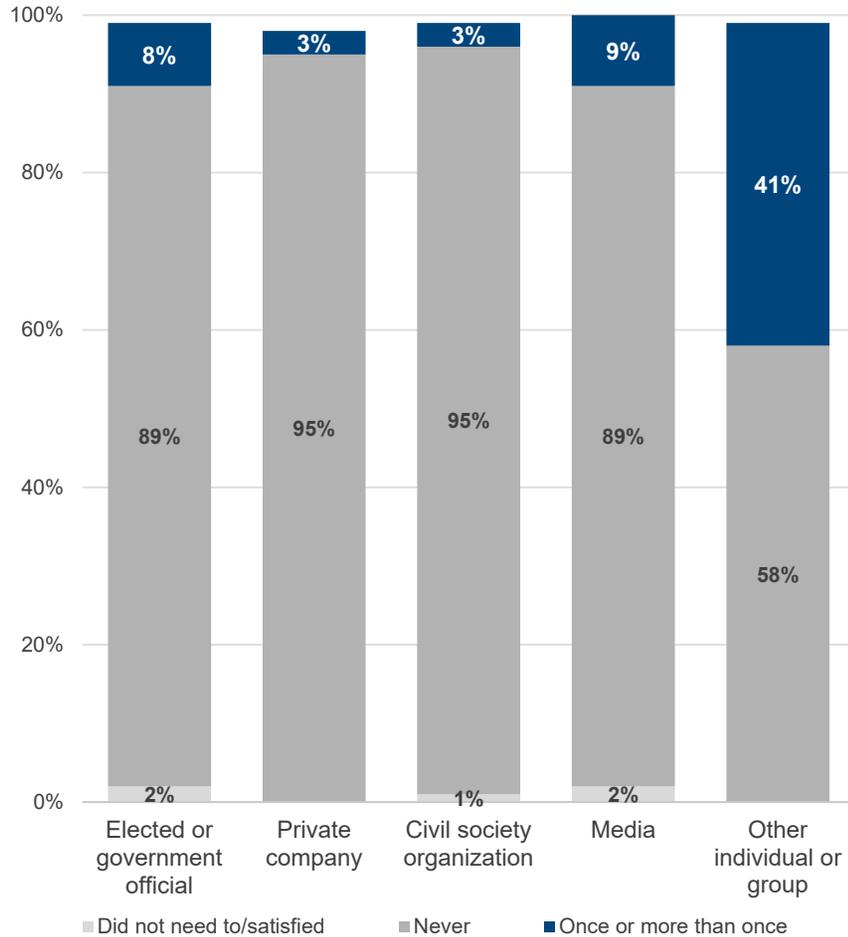
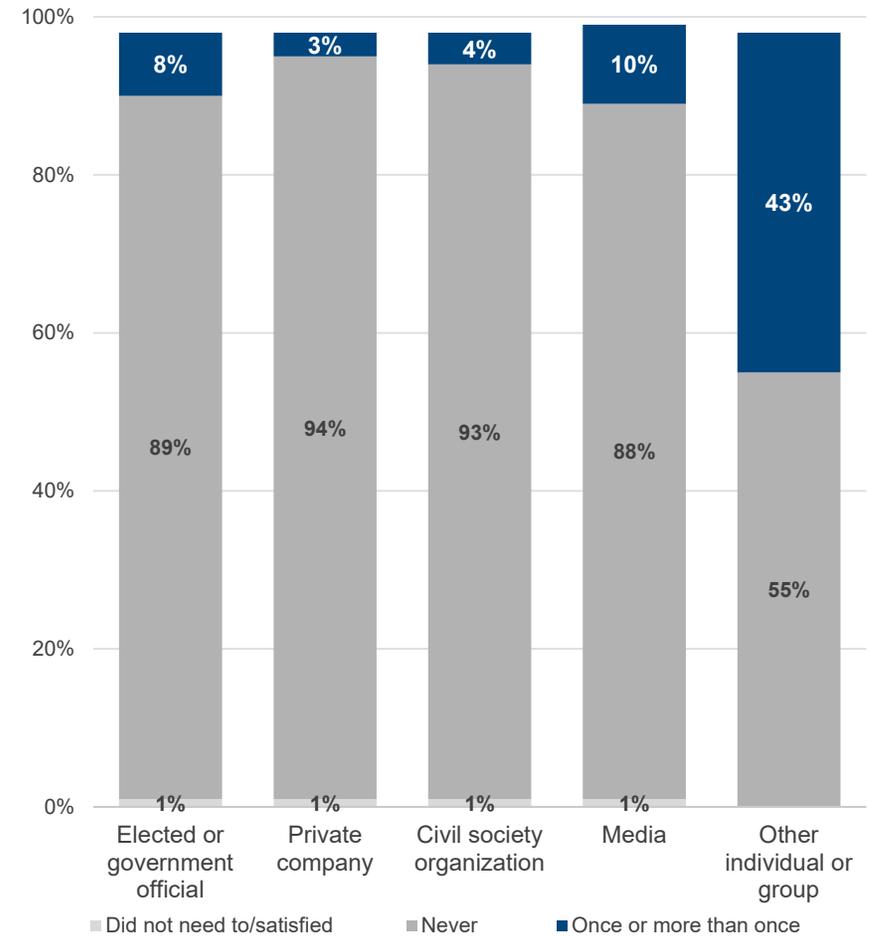


Exhibit 16: Proportion of citizens nationally contacting the following to demand for services (STRAT 17.1)²⁵

Source(s): EL Partner National Telephone Survey (2019)

Sample: 5,067

Over the past 12 months, how many times have you contacted one of the following groups or individuals to voice a grievance related to any type of corruption?



²⁴ A range of 1 to 2 percent of respondents across categories did not know.

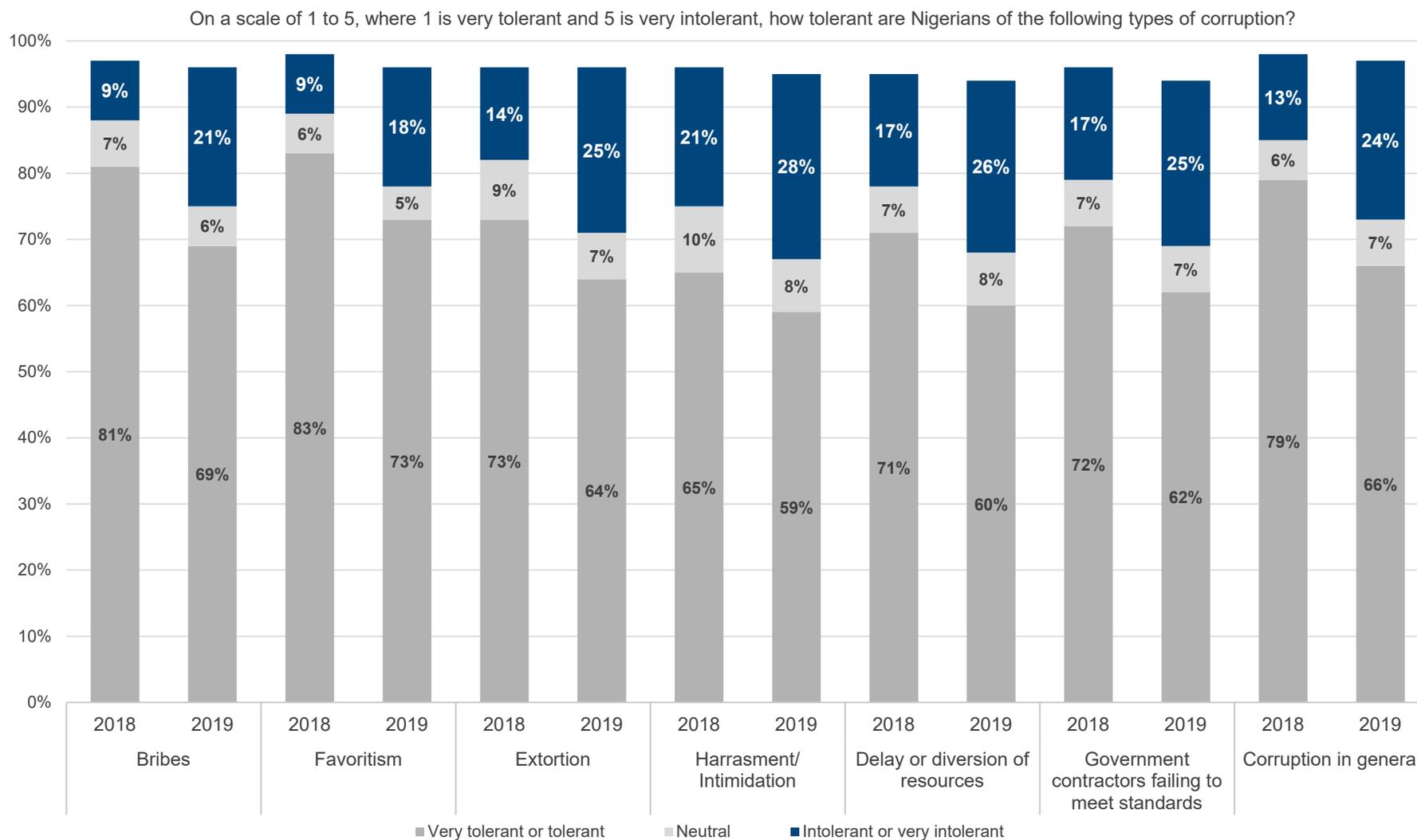
²⁵ A range of 1-2 percent of respondents across categories did not know.

Exhibit 17: Citizens indicating they lack tolerance for different types of corruption in On Nigeria target states (STRAT 12.2)²⁶

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: 2,469

Sample, 2019: 1,749



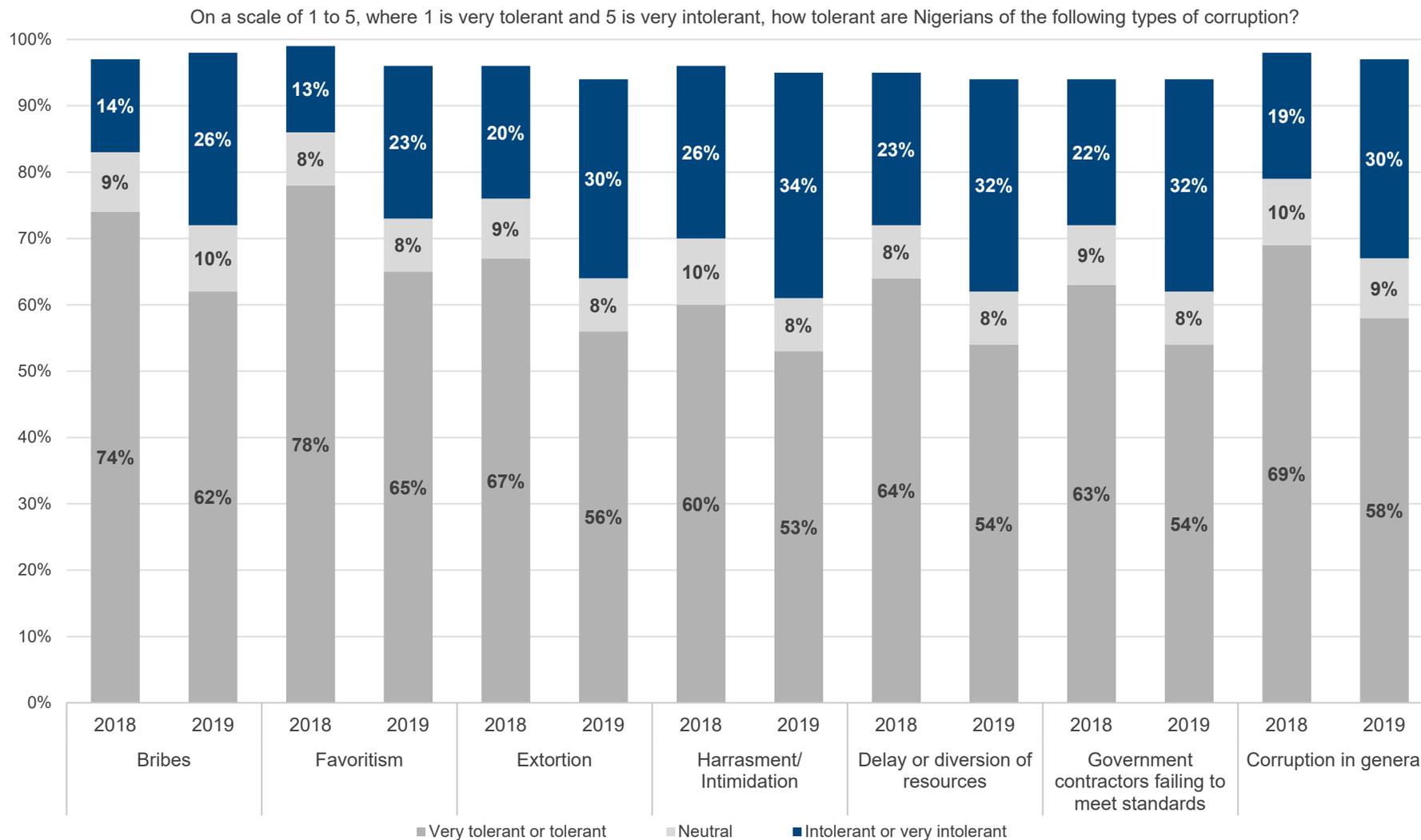
²⁶ A range of 1 to 6 percent of respondents across categories and years either did not know or refused to answer.

Exhibit 18: Citizens indicating they lack tolerance for different types of corruption nationally (STRAT 17.2)²⁷

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: 8,043

Sample, 2019: 5,067



²⁷ A range of 1 to 6 percent of respondents across categories and years either did not know or refused to answer.

Exhibit 19: Bribery rate for key sectors and overall (STRAT 14.1)

Source(s): Afrobarometer/Transparency International Global Perception Barometer (2015, 2017)

Sample, 2015: 2,400

Sample, 2017: 1,600

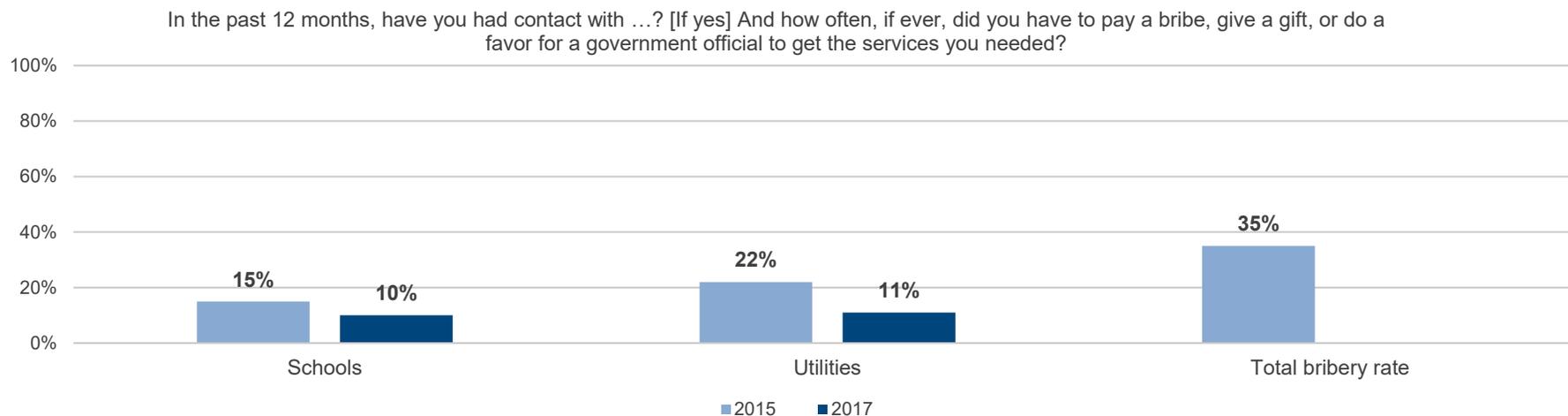


Exhibit 20: Number of grantee mentions in media reporting on corruption issues, by module (CJ 8.1, HGSF 6.1, UBEC 6.1, and ELEC 6.1)

Source(s): Media monitoring—conventional media

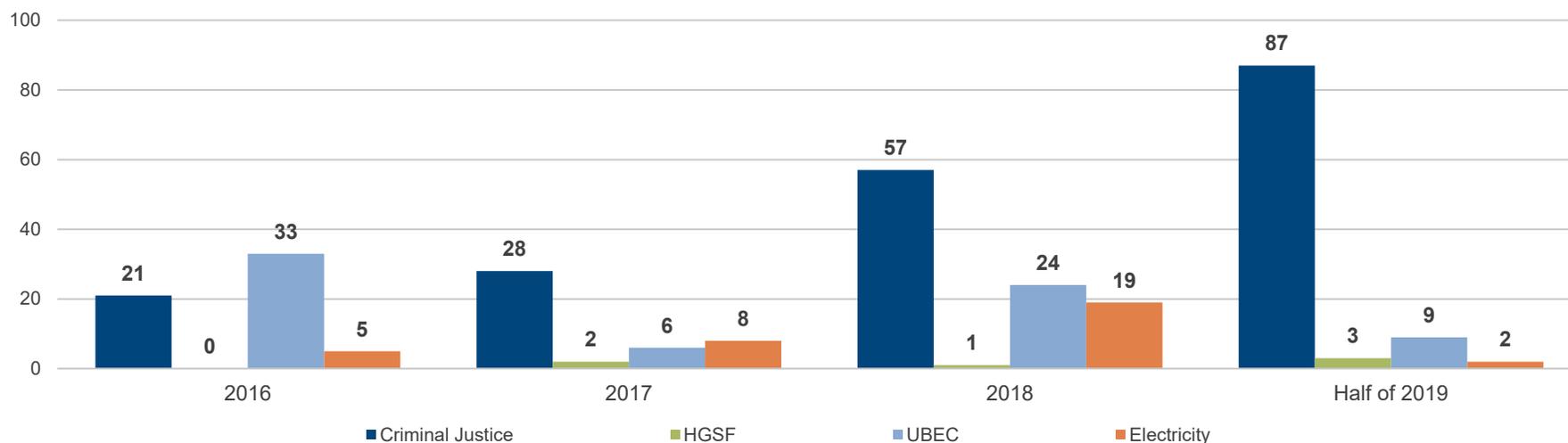


Exhibit 21: Proportion of Nigerians stating that corruption is the most important issue for the government of Nigeria to address in the next 12 months

Source(s): Gallup

Sample: 1,000 for each round of polling

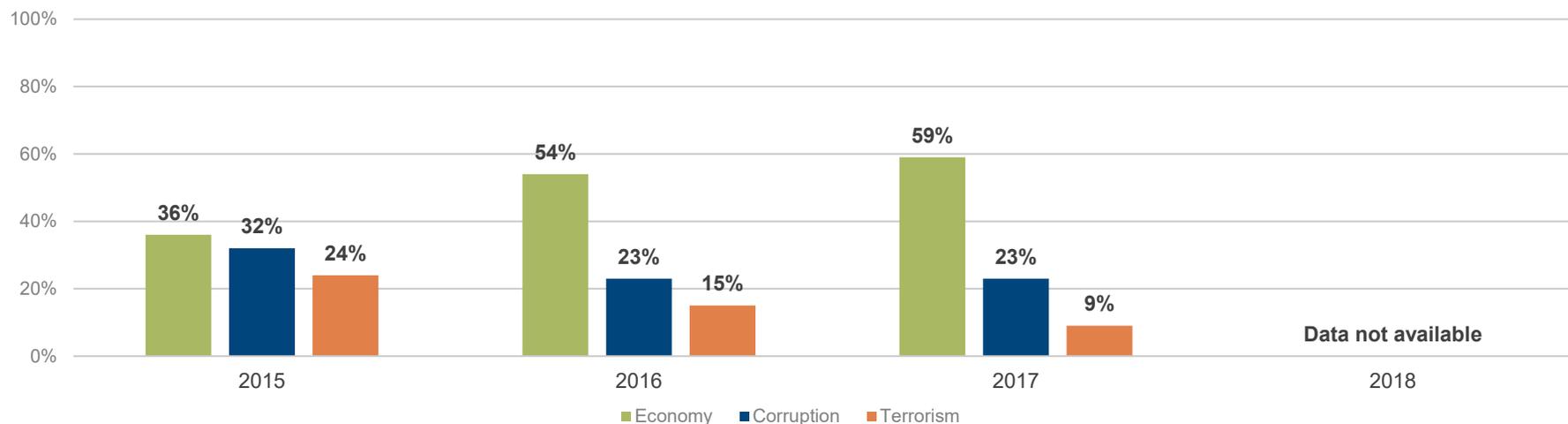


Exhibit 22: Strategy assumptions

Assumption

Level of Confirmation

Government officials are internalizing norms of transparency and accountability, and demonstrating decreased tolerance for corruption.



The federal and state governments will adopt policies and laws that address corruption (e.g., asset recovery, ACJA, and whistleblower protection laws).



Structural barriers that impede quality services and products (independent of corruption) to education and electricity programming can be overcome.



Confirmed: Mixed: Rejected: Insufficient Evidence:

Exhibit 23: “Voice” actors’ demand for HGSF services (HGSF 10.1)

Source(s): Qualitative interviews and focus groups (2018, 2019)

Sample, 2018: 14 (School and community-based groups)

Sample, 2019: 43 (Federal and state officials, school and community-based groups, others)

Themes

2018 n=14	In both 2018 and 2019, school-level actors taste and reject unsatisfactory food, demanding that vendors replace poorly prepared food and make up for missed days, and reporting issues in the program to their local HGSF officials. In 2019, several community level actors believed that their monitoring and advocacy activity had contributed to improved service delivery.
2019 n=43	
	<p>Previously, there was the issue of some children not getting the food. Thanks to God, the SBMC, and the Headmaster, we all laid our complaints to the monitoring exercise people and everyone now gets food as expected. – Parents, Kaduna, 2019</p> <p>We reported cooks that are underperforming in writing to the state. – Grantee, 2019</p> <p>Previously, even the taste was awful, and the kids [didn't] eat... but the vendors were warned of possible problems to their contract and they have adjusted. – Parents, Kaduna, 2019</p>

Exhibit 24: Facilitators and inhibitors of school-level HGSF monitoring (HGSF 10.2)

Source(s): Qualitative interviews and focus groups (2019); grantee monitoring data

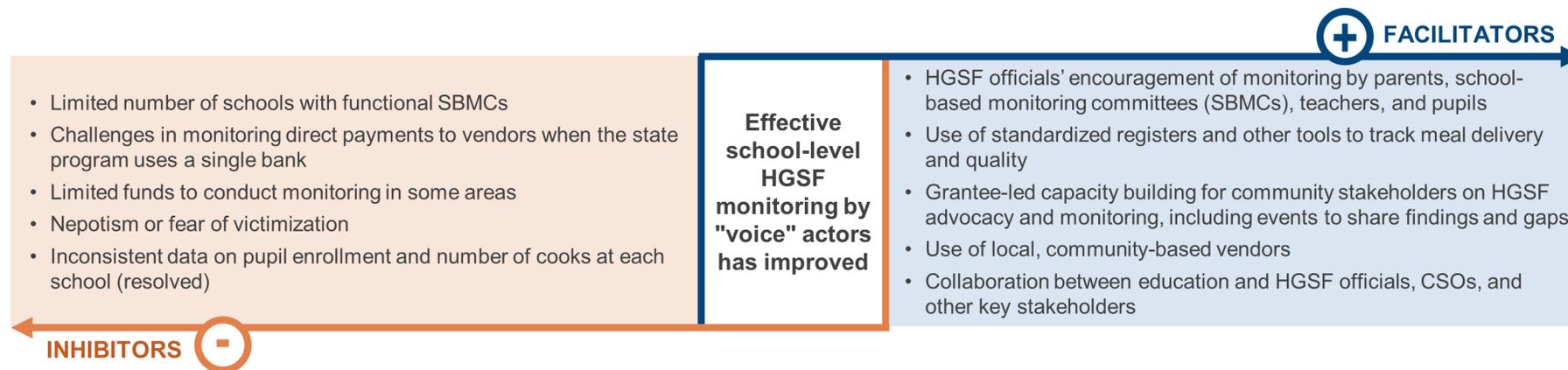
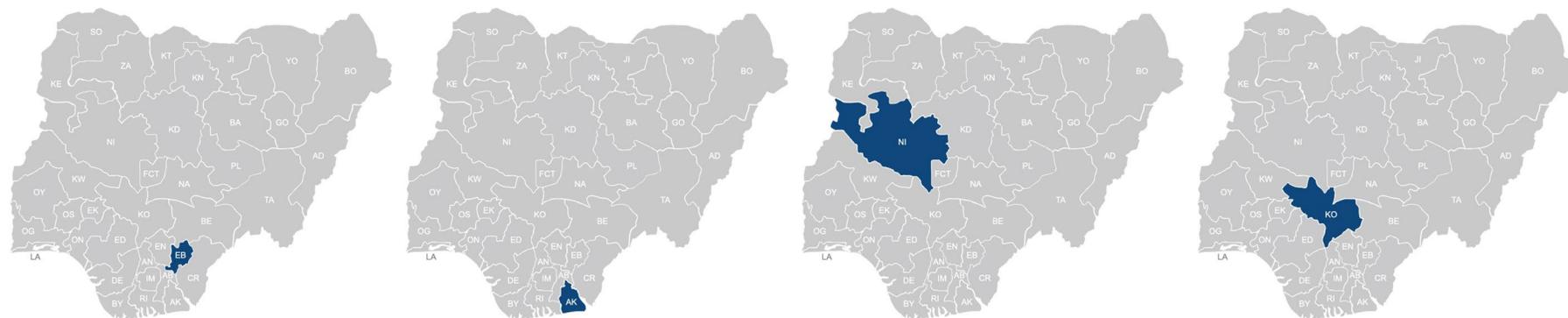


Exhibit 25: Federal sanctioning of states in HGSF program (HGSF 12)

Source(s): Grantee monitoring data



Ebonyi

Sanction	Suspension 1 year
Year	2017
Reason	Bank fraud

Akwa Ibom

Sanction	Suspension 6 months
Year	2017
Reason	Lack of capacity to run program

Niger

Sanction	Suspension 5 months
Year	2018
Reason	Project management fraud

Kogi

Sanction	Suspension 1 month
Year	2019
Reason	Project management fraud

Exhibit 26: State sanctioning of HGSF vendors (HGSF 13.1)

Source(s): Qualitative interviews and focus groups (2018, 2019); grantee monitoring data

Sample, 2018: 14 (state and federal HGSF officials, vendors and aggregators, CSOs, and school and community-based groups)

Sample, 2019: 25 (state and federal HGSF officials, vendors and aggregators, CSOs, and school and community-based groups)

Theme	Supporting Themes	 Illustrative Quotes
<p>In general, "teeth" and "voice" actors collaborate to sanction aggregators and cooks who do not fulfill the terms of their contracts.</p>	<p>Nepotism is an inhibitor of effective sanctioning, but in 2019, qualitative respondents provided several examples of government and HGSF officials and grantees sanctioning vendors despite their political connections.</p>	<p>There is this cook who was defaulting in supply. She was supplying only once in a week. When she was told that we want[ed] to see her, she boasted that her brother is an APC [All Progressive Congress] politician and nothing can be done to her. Eventually, we took it up at the state and federal levels and she was terminated.</p> <p style="text-align: right;">– Grantee, 2019</p>
	<p>Other challenges to effective sanctioning included a lack of headteacher supervision mechanisms (2018); the use of direct vendor payments that limit state sanctioning; and overlap in the actions of federal and state governments to sanction vendors, particularly in Kaduna.</p>	<p>When we have a report against an individual [vendor] directed to us at the federal [level], we still need to go through the state. The response time of the state... team has not helped so much in Kaduna, so most times we have had to take steps.</p>
	<p>Because they have direct control over aggregators, states are better able to sanction them for noncompliance than cooks.</p>	<p style="text-align: right;">– Federal HGSF official, 2019</p>

Exhibit 27: Corruption disruptors in HGSF supply chain since start of On Nigeria (HGSF 15)

Source(s): Qualitative interviews and focus groups; document review; grantee monitoring data

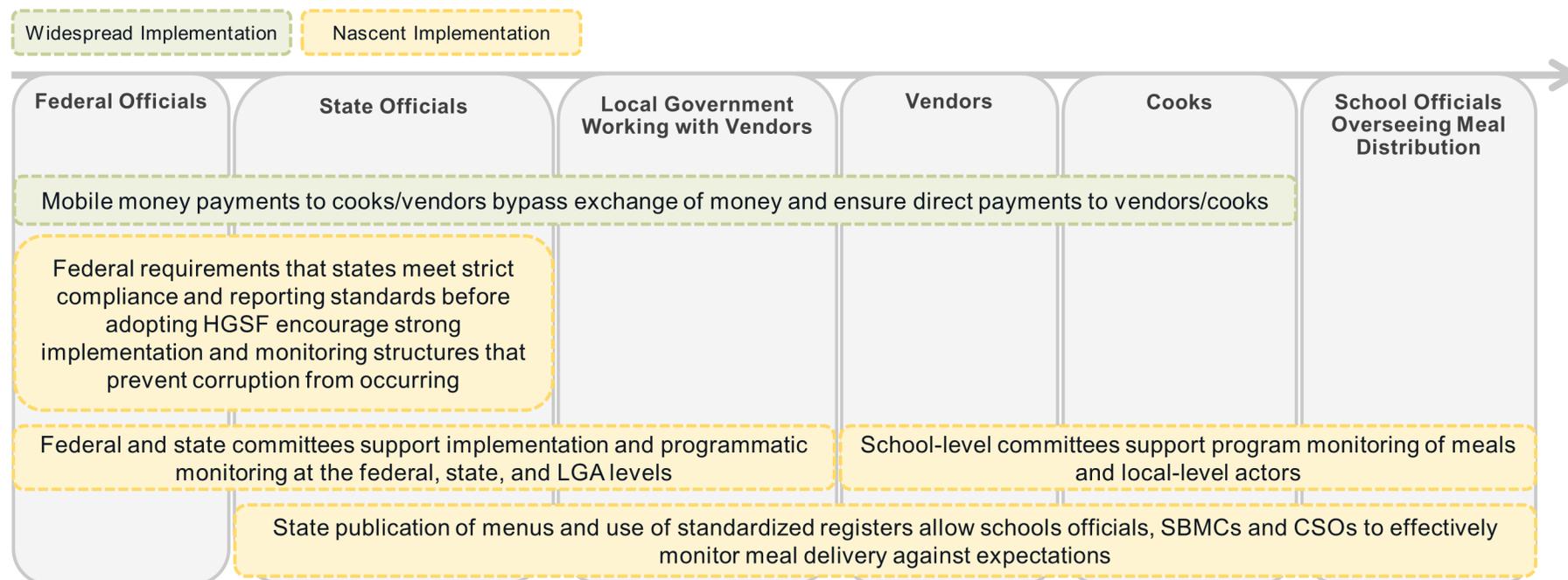


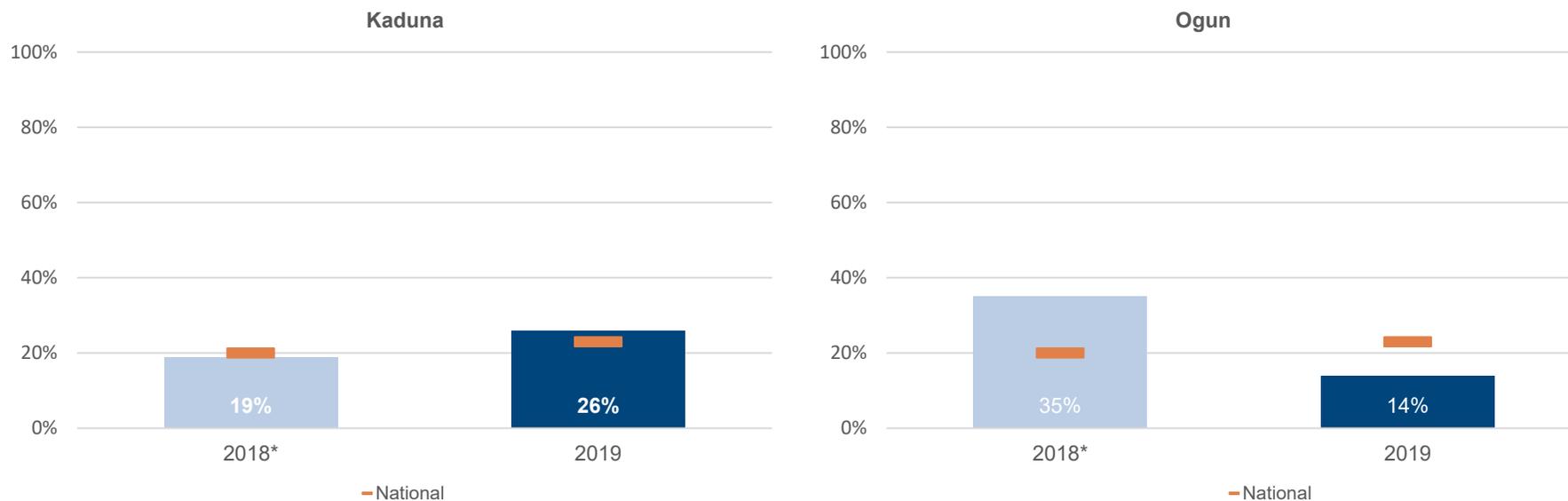
Exhibit 28: Proportion of citizens contacting an official to demand HGSF resources for their children/schools (HGSF 14 and 18)

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: Kaduna = 75*, Ogun = 33*, National = 1,290

Sample, 2019: Kaduna = 661, Ogun = 303, National = 1,538

In the past 12 months, have you ever contacted the following about an HGSF meal that was not provided to your child, or about the quality of the meals: School staff (head teacher, teacher), parent association/PTA/SBMC, other government or elected official, other? [if yes]



*Note: 2018 sample sizes are too small to be representative of the general population.

Exhibit 29: Proportion of HGSF meals that are: (1) delivered and (2) meet HGSF contract standards (HGSF 16.1 and 20.1)

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: Kaduna = 65*, Ogun = 13*, National = 1,155

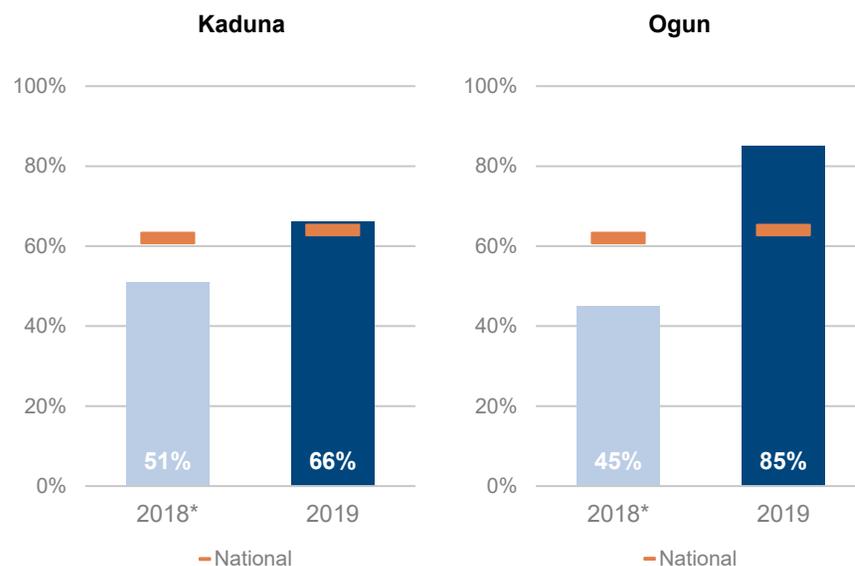
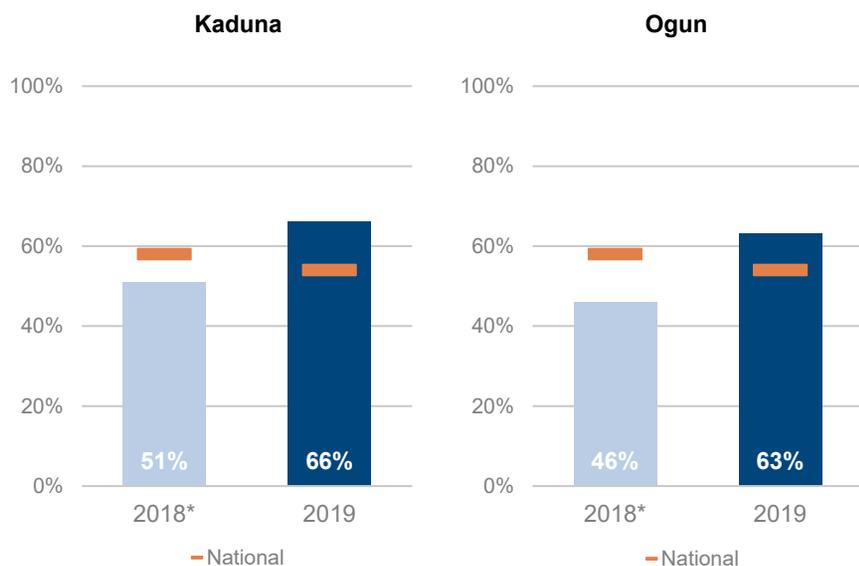
Sample, 2019: Kaduna = 661, Ogun = 303, National = 1,538

In a week, how often does your child receive the HGSF meals they are supposed to receive? (Among parents with government primary school children in target HGSF states who appear eligible for HGSF meals)

On a scale of 1 to 5, where 1 is very poor and 5 is very good, how would you assess the quality of the HGSF meals your child receives? (Among parents with government primary school children in target HGSF states who receive HGSF meals)

Proportion of parents who said meals delivered "every day" or "most days"

Proportion of parents who said meals were of "good" or "very good" quality



*Note: 2018 sample sizes are too small to be representative of the general population.

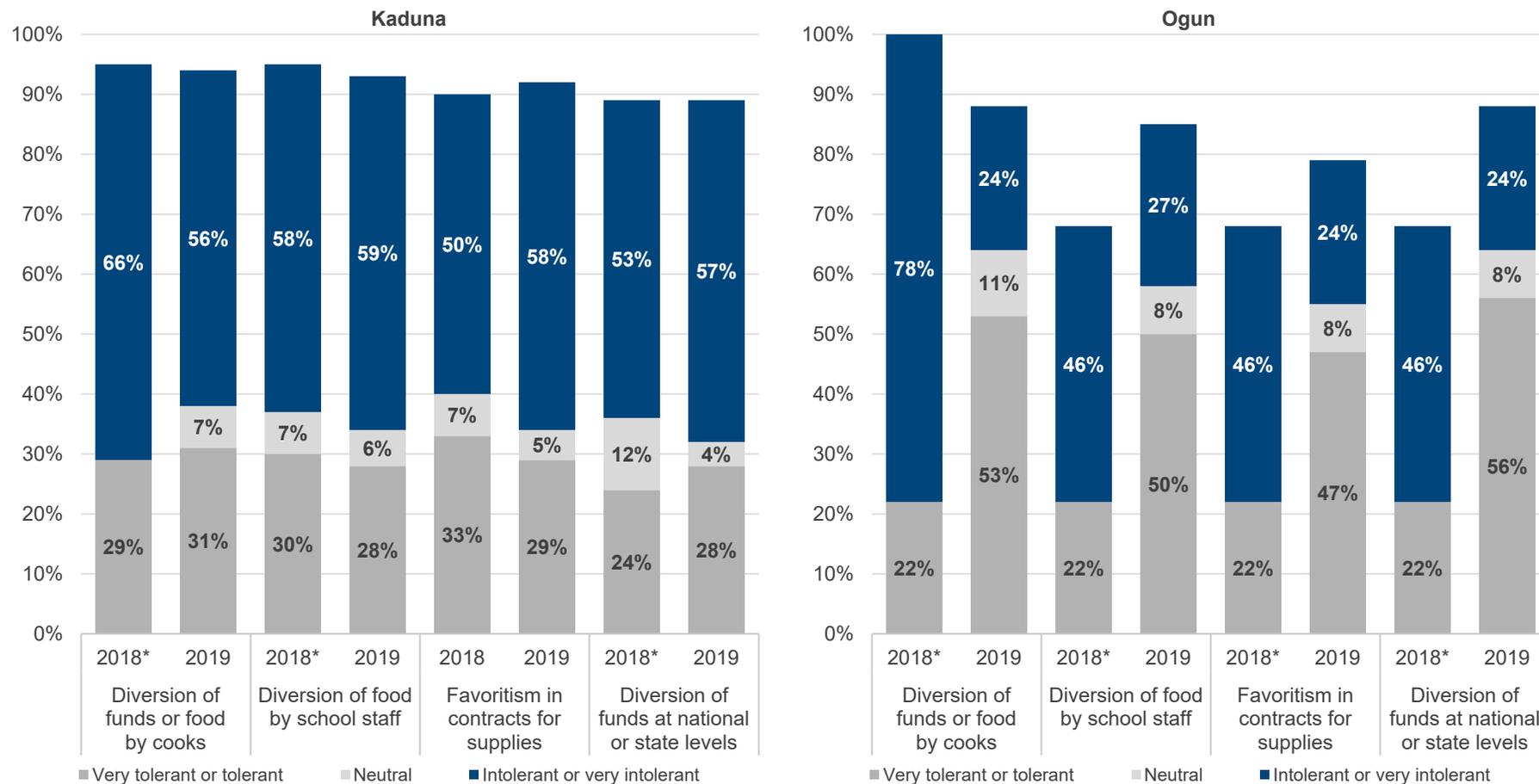
Exhibit 30: Proportion of citizens who indicate they lack tolerance for different types of corruption related to HGSF services in target states (HGSF 17) and nationally (HGSF 21)²⁸

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: Kaduna = 23*, Ogun = 4*, National = 1,155

Sample, 2019: Kaduna = 245, Ogun = 38, National = 524

On a scale of 1 to 5, where 1 is very tolerant and 5 is very intolerant, how tolerant are Nigerians of the following types of corruption?



*Note: 2018 sample sizes are too small to be representative of the general population.

²⁸ A range of 0 to 32 percent of respondents across categories and years either did not know or refused to answer.

On a scale of 1 to 5, where 1 is very tolerant and 5 is very intolerant, how tolerant are Nigerians of the following types of corruption?

National

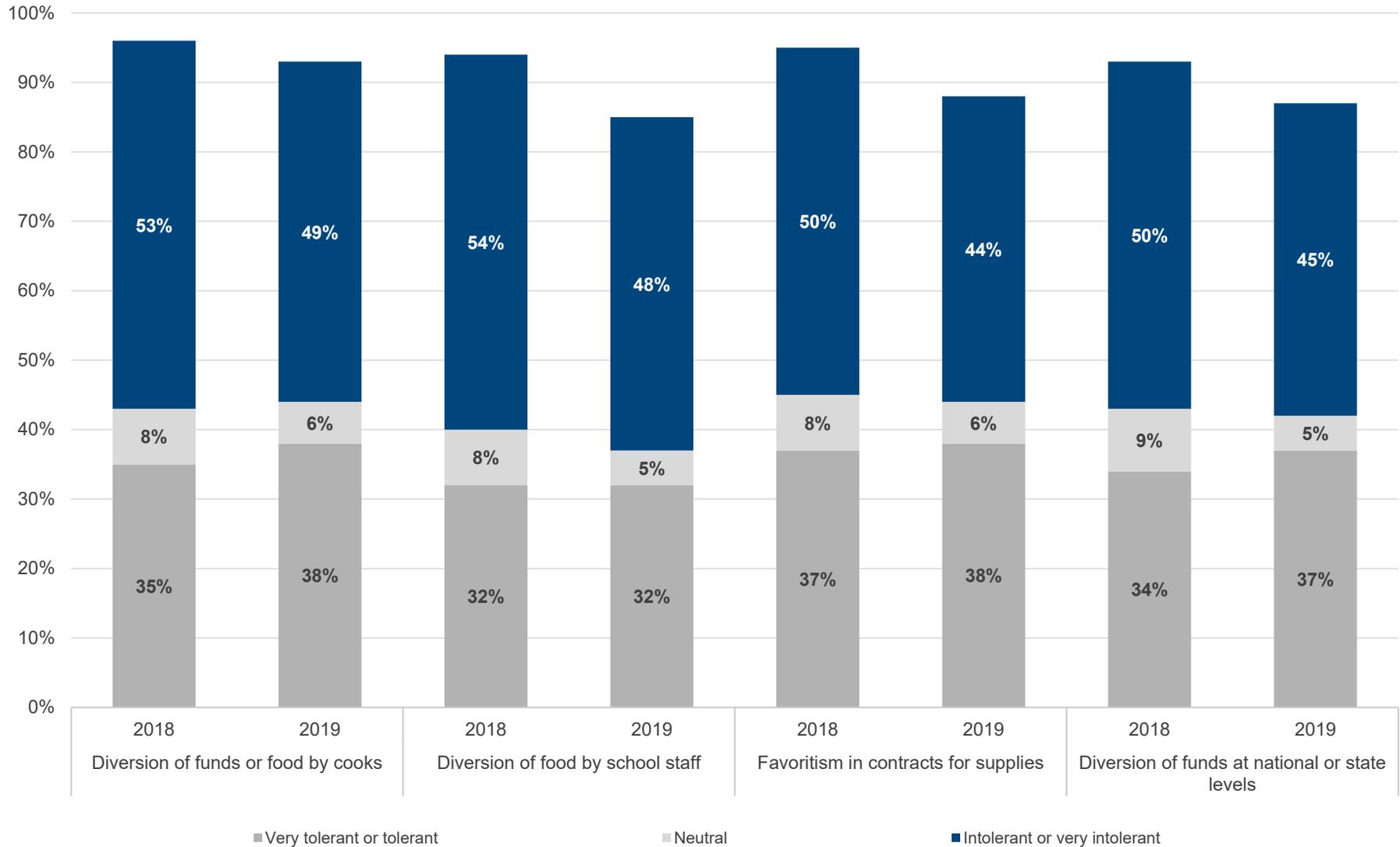


Exhibit 31: CSO influence on federal and state HGSF actors (HGSF 13.2 and Assumption C)

Source(s): Qualitative interviews and focus groups (2018, 2019)

Sample, 2018: 9 (School and community-based organizations, CSOs, federal and state HGSF officials)

Sample, 2019: 48 (School and community-based organizations, CSOs, federal and state HGSF officials)

Themes

2018 n=9	As of 2019, federal and state governments are responsive to the inputs of grantee and non-grantee CSOs—as well as other community-level actors—on how to improve implementation and monitoring of the National HGSF Program. In 2018, grantee and non-grantee CSOs similarly reported that state governments were open to CSO monitoring and engagement, though provided fewer examples since they were still in early stages of implementation.
2019 n=48	
	<p>From our initial meeting so far, the buy-in looks good from the state committee in charge of the HGSF program...The reaction, body language, etc. looks good. We are waiting to see whether when we begin implementation it will continue or change. – Non-grantee CSO, 2019</p> <p>[State HGSF actors] have been receptive to comments and observations, and they are even happy that instead of launching a media attack, we are bringing issues to them to address. Because of that, there is that mutual trust between the agency and the NGO working to monitor the program. – Non-grantee CSO, Ogun, 2019</p> <p>When people call and complain about one or two things, we try to respond and give them feedback that we have done it right, even on social media...I think that encourages them to go out and do more. – Federal HGSF official, 2019</p> <p>The fact that we are meeting face to face with cooks (about 70 of them) is sending signals to the state and other actors to sit up. – Grantee, 2019</p>

Exhibit 32: HGSF assumptions

Assumption	Level of Confirmation
The HGSF and states have political will to address issues of governance and accountability.	
States sign on to the HGSF and roll it out.	
Target states (Kaduna and Ogun) and federal government are responsive to grantees, CSOs, and parents.	
State officials and school administrators have adequate management skills, processes, and resources or receive relevant technical assistance to manage the program effectively and efficiently.	

Confirmed: 
 Mixed: 
 Rejected: 
 Insufficient Evidence: 

Exhibit 33: “Voice” actors’ demand for UBEC Intervention Fund services (UBEC 10.1)

Source(s): Qualitative interviews and focus groups (2018, 2019)

Sample, 2018: 13 (Grantees, non-grantee CSOs, government officials, school and parent groups)

Sample, 2019: 47 (Grantees, community leaders, federal UBEC official, non-grantee CSOs, school official groups, parent groups, SBMCs, state officials – SUBEB, and vendor/contractors)

Themes

<p>2018 n=13</p>	<p>CSO and citizen voices demanding improved UBEC action and services have increased over the past 3 years, and as a result this voice is creating positive change.</p>
<p></p>	<p>[Three years ago] people were very reluctant at raising their voices. But now, with the whistle blowing policy, people are really demanding for accountability at all levels. – Non-grantee CSO, 2018</p> <p>When we launched our project (On Nigeria) some communities came there determined to get SUBEB to explain to them why there were midway modifications of projects. These are the kinds of debate we want to see – although forceful but the conversation on accountability held without calling anybody a thief as such they were able to isolate grey issues. I think SUBEB has been very receptive, even at the local government level, the Education Secretaries too have been extending to us real cooperation and they have also been giving to us close access to the SBMCs. We have been having perfect working relationship with these agencies. – Grantee, 2018</p>
<p>2019 n=47</p>	<p>"Voice" actors, including SBMCs, PTAs, school officials and CSOs including grantees are reporting issues and demanding quality UBEC services from SUBEBs and contractors.</p>
<p></p>	<p>The community is taking ownership of project by demanding for their rights. We sensitise the community about projects in their school, and they call the contractors and ask why the projects are not on. They also call SUBEB... – Grantee, 2019</p> <p>The SBMC are more vocal when they come across things not done or done, they contact us and ask questions about how they have come about. They write letters and advocate also. I received 86 SBMCs from January to date on UBE projects. – SUBEB official, On Nigeria UBEC target state, 2019</p> <p>We did not give the government any breathing space; we were persistent in our requests for help. – Parent group, On Nigeria UBEC target state, 2019</p>

Exhibit 34: Monitoring activities by UBEC grantees (UBEC 10.2)

Source(s): Document Review

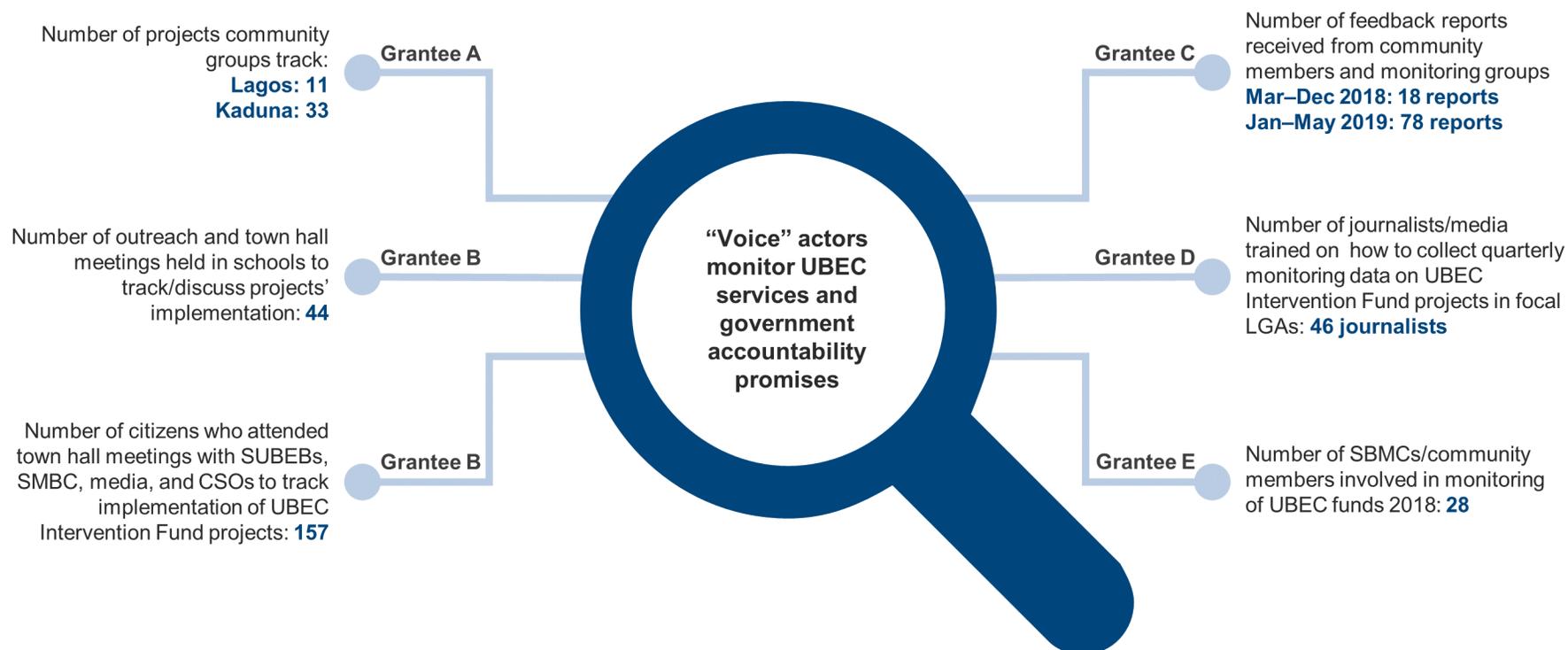


Exhibit 35: UBEC sanctioning of SUBEBs and SUBEB officials (UBEC 14.1)

Source(s): Qualitative Interviews and Focus Groups (2019); Document Review

Sample: 10 (grantee FGD, UBEC federal officials, non-grantee CSO, school official group, state officials – SUBEB)

Sanctions

2017	<ul style="list-style-type: none"> • UBEC froze funds for two SUBEBs • UBEC suspended five SUBEB accounts for diversion of funds • UBEC sanctioned five Edo SUBEB board members for bribes
2018	<ul style="list-style-type: none"> • UBEC froze funds for 10 states • Former chairman and staff member of Benue SUBEB jailed for embezzlement
2019 n=10	<ul style="list-style-type: none"> • UBEC withheld federal funds until states made up gaps in state matching funds • Zamfara SUBEB chairman jailed for diversion of funds
	<p>We hear of some states like [redacted], [redacted], and Zamfara that were sanctioned because they diverted UBEC funds for some other state projects. What UBEC did for such states was to withhold subsequent funds meant for their states until they refunded the money they diverted.</p> <p>– SUBEB official, On Nigeria UBEC target state, 2019</p>

Exhibit 36: Sanctioning of UBEC Intervention Fund vendors (UBEC 14.2)

Source(s): Qualitative Interviews and Focus Groups (2019)

Sample: 25 (school administration groups, school parent groups, SUBEB officials, UBEC official, community leaders, non-grantee CSO, grantee focus group discussion, and contractors)

Sanctions

2018	New question asked in 2019. No data to compare for 2018.
2019 n=25	<ul style="list-style-type: none"> • UBEC sanctioned noncomplying vendors working on projects funded directly from UBEC • Few SUBEBs sanctioned directly; in several cases, vendors were required to redo poorly constructed projects at no cost
	<p>I have heard of a contractor whose work was stopped at [redacted] until the due process was followed. SUBEB team went and inspected the work, and the engineers advised on what to do to rectify the work. The work was demolished on his (the contractor's) account and asked to do it all over. This made us all of us [sic] to sit up.</p> <p>– Contractor, On Nigeria UBEC target state (2019)</p>

Exhibit 37: UBEC Intervention Fund projects by year in a grantee’s Budeshi OCDS portal, nationwide (UBEC 12)

Source(s): Document reviews

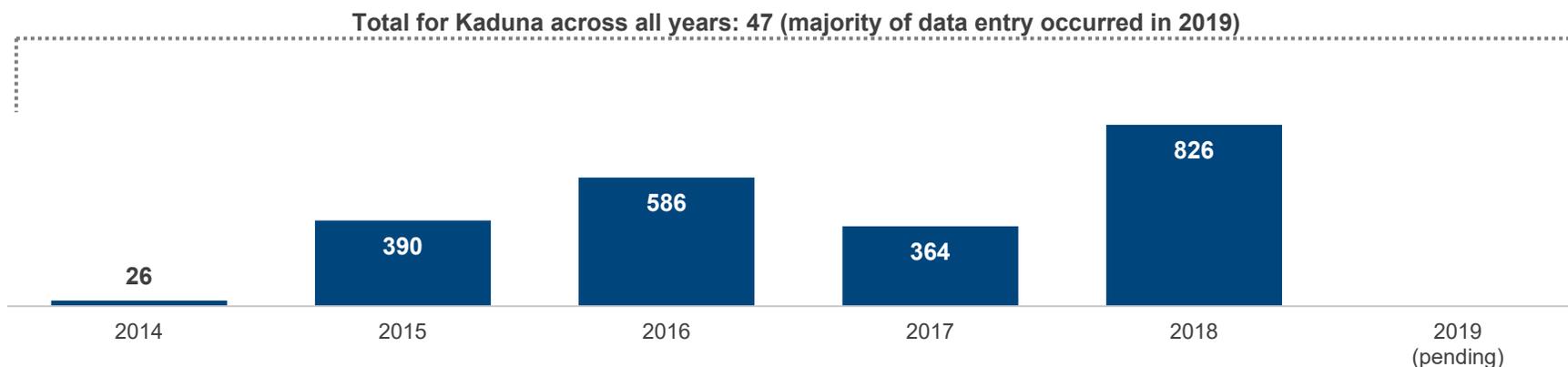


Exhibit 38: Corruption disruptors in UBEC supply chain since start of On Nigeria (UBEC 16 and 20)

Source(s): Qualitative interviews and focus groups; document review; grantee monitoring data

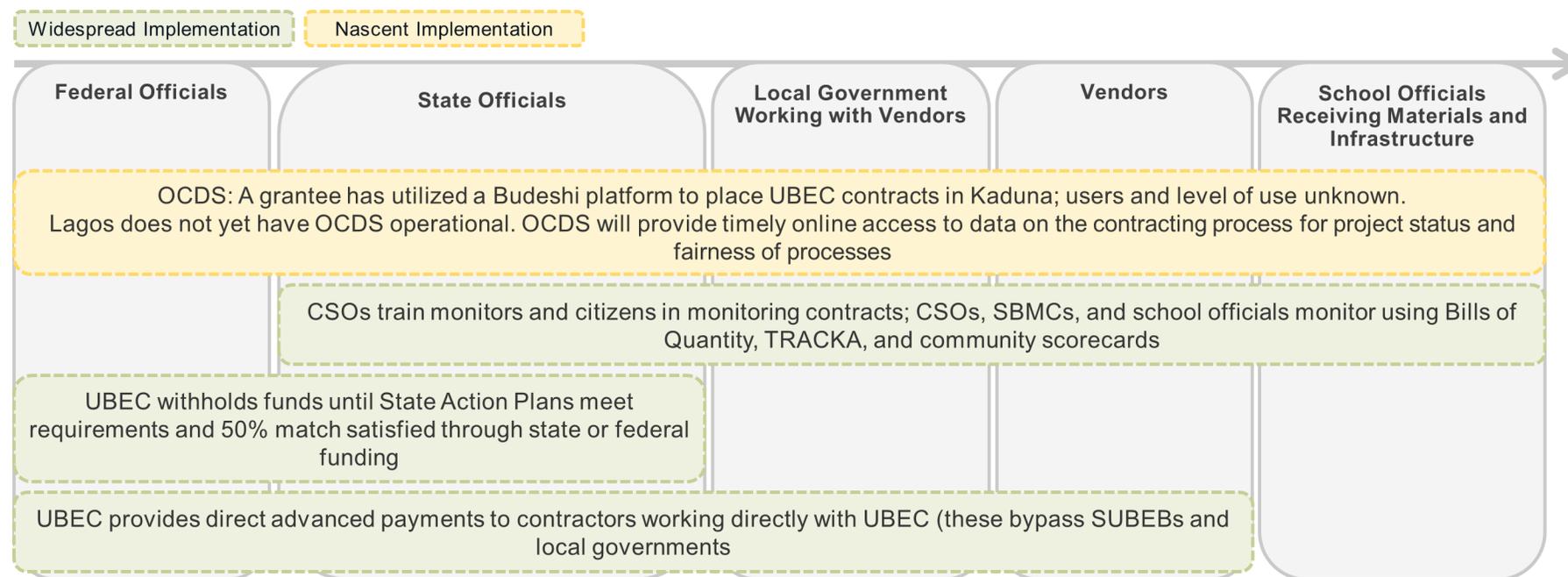


Exhibit 39: Public information gaps regarding SUBEBs and vendors (UBEC 13)

Source(s): Qualitative interviews and focus groups (2018, 2019); document review

Sample, 2018: 16 (Grantees, non-grantee CSOs, local, state and federal officials, school groups)

Sample, 2019: 44 (Grantees, community leaders, federal officials – UBEC, non-grantee CSOs, school official groups, parent groups, SBMCs, state official – SUBEBs, and vendors and contractors)

Themes

<p>2018 n=16</p>	<p>Transparency by UBEC and SUBEBs is limited, at best.</p>
<p></p>	<p>There is improvement but there is reluctance in providing information at the state level. We are just lucky to begin to get response. I guess it is as a result of engagement with UBEC.</p> <p style="text-align: right;">– Grantee, 2018</p> <p>There are times we are able to access information from the website of UBEC. It is not all the time though. Most of the time when we are able to access UBEC website, we discover bulk of the information therein are old and obsolete.</p> <p style="text-align: right;">– SUBEB, On Nigeria UBEC target state, 2018</p>
<p>2019 n=44</p>	<p>While the UBEC website includes information on:</p> <ul style="list-style-type: none"> • Funds accessed by the state • Contractor ratings • Construction projects by school • Renovation projects by school • Meeting reports <p>The public still lacks access to SUBEB and vendor information from the UBEC website.</p>
<p></p>	<p>The quality has improved ... unlike previously when we just see a contractor working and we do not know whether he is from State or Federal Government. Now, he comes to us and tells us the kind of work and share the contract agreement and we also use that to inspect. When he deviates, we bring him back...</p> <p style="text-align: right;">– Community leader, On Nigeria UBEC target state, 2019</p>

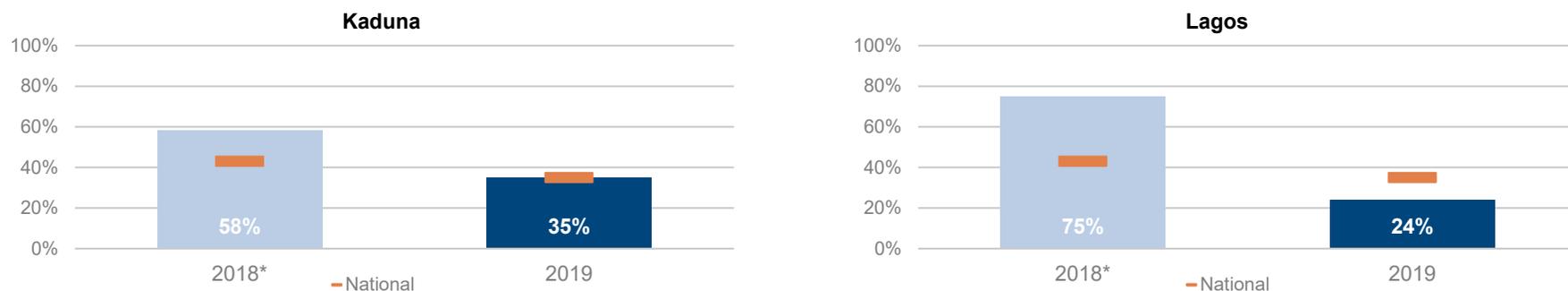
Exhibit 40: Proportion of goods and services allocated by UBEC and SUBEBs actually received by schools (UBEC 17.1 & 21.1)

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: Kaduna = 19*, Lagos = 9*, National = 539

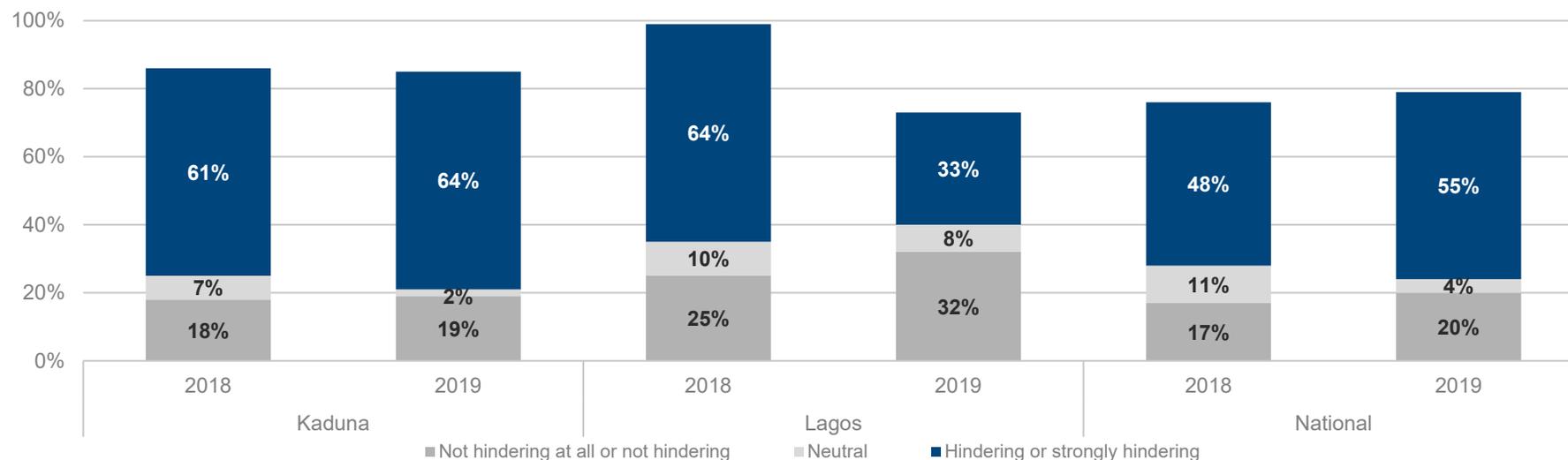
Sample, 2019: Kaduna = 361, Lagos = 115, National = 940

In your opinion, is there corruption in the UBEC Intervention Fund? Proportion responding “Yes”.
(Among population with children in government primary or junior secondary schools targeted to receive UBEC Intervention Fund resources)



*Note: 2018 sample sizes are too small to be representative of the general population.

To respondents indicating “Yes” above: How much do you feel corruption is hindering delivery of resources to your child’s school through the UBEC Intervention Fund program? (Among population with children in government primary or junior secondary schools targeted to receive UBEC Intervention Fund resources)²⁹



²⁹ A range of 1 to 27 percent of respondents across categories and years either did not know or refused to answer.

Exhibit 41: Improvements in timeliness of UBEC Intervention Fund projects (UBEC 17.2)

Source(s): Qualitative interviews and focus groups (2018, 2019)

Sample, 2018: 25 (Grantee CSOs, government officials, school and parent groups)

Sample, 2019: 56 (School parent groups, school administrative groups, SBMCs, SUBEB officials, UBEC officials, community leaders, non-grantee CSOs, and grantee focus group discussions)

Themes

<p>2018 n=25</p>	<p>Schools are receiving goods and services—buildings, books, etc.; some schools are not, for reasons they do not understand. Approximately half of school-based respondents or CSO’s speaking for schools receiving goods are unhappy with quality, amount, or timeliness.</p>
<p>“</p>	<p>We have been benefitting from materials such as chairs, books, and writing materials. – School personnel, On Nigeria UBEC target state, 2018</p> <p>We are funded to work in [On Nigeria target state]... Our members also work in other states like Kwara, Kogi, Lagos and send us monitoring reports. We see that the same issues (delay in implementation and poor quality) cut across the whole states. – Grantee, 2018</p>
<p>2019 n=56</p>	<p>Timeliness of projects has improved in targeted states in 2019. All school-based respondent groups attribute improvements to:</p> <ul style="list-style-type: none"> • States’ access to federal funds in a timely way • Increased monitoring by community groups, UBEC, and SUBEBs
<p>“</p>	<p>There is much difference and we are happy and praying for the government. Last year, the school was going to collapse on the pupils and the LGA came to inspect and sent the pupils to Alaro High School in Iraye. About some months after, we were informed that classrooms will be built. They started with the bungalow and rushed it because of the rains. Then the other building was done. We praise the government of Ambode for doing it. – School parent group, Lagos, 2019</p>

Exhibit 42: UBEC assumptions

Assumption	Level of Confirmation
UBEC and SUBEBs have the political will to address long-standing government accountability issues.	
UBEC, SUBEBs, and school administrators in target states (Kaduna and Lagos) are responsive to grantees, CSOs, and parents.	
State officials and school administrators have adequate management skills, processes, and resources or receive relevant technical assistance to manage the program effectively and efficiently.	
UBEC and SUBEBs assign human resources to the OCDS and funds monitoring. SUBEBs implement the OCDS. Meanwhile, grantees contribute to transparency and accountability in the previous systems until the OCDS is operational.	

Confirmed:  Mixed:  Rejected:  Insufficient Evidence: 

Exhibit 43: Proportion of DISCO customers who know their rights (ELEC 2)

Source(s): EL Partner National Telephone Survey

Sample, 2018: 7,549

Sample, 2019: 4,699

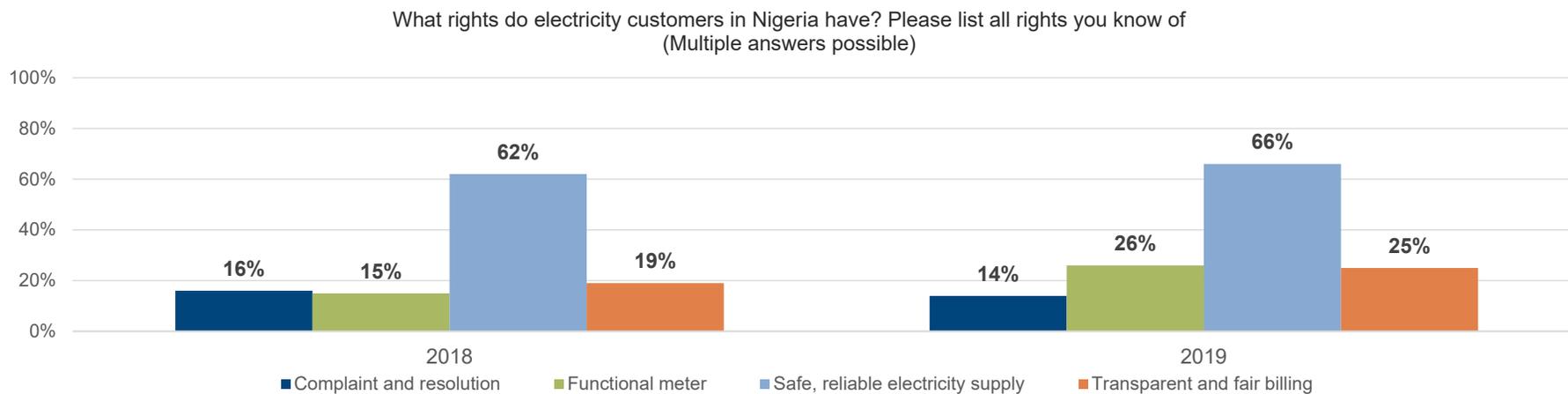


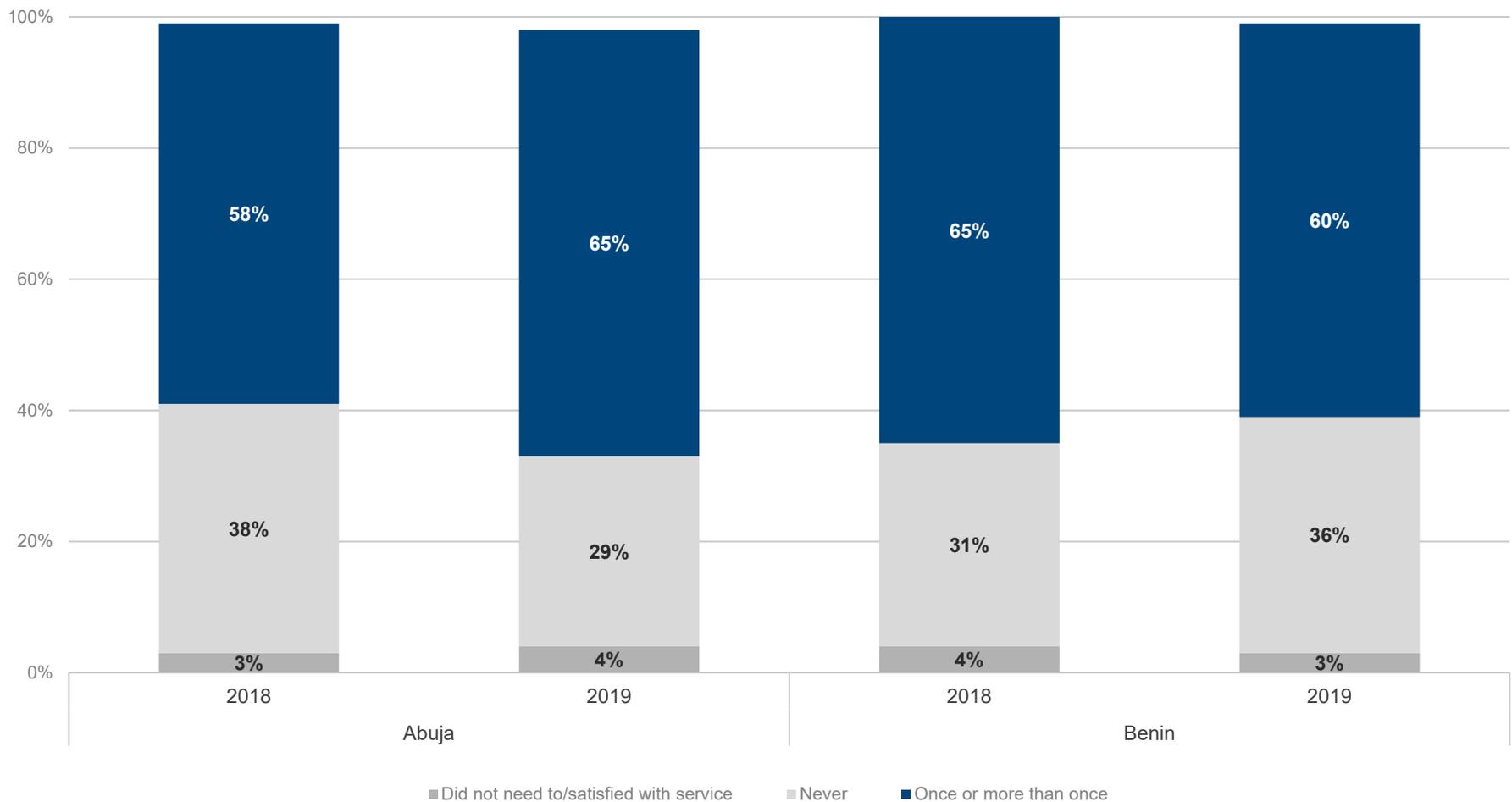
Exhibit 44: Customers' use of redress mechanisms to demand electricity services (ELEC 10.1)³⁰

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: Abuja = 584, Benin = 691

Sample, 2019: Abuja = 367, Benin = 509

Over the past 12 months, how many times have you contacted a DISCO representative due to a performance problem or grievance related to your electricity services?



³⁰ A range of 1-2 percent of respondents across categories did not know.

Exhibit 45: Methods of monitoring electricity services (ELEC 10.2)

Source(s): Qualitative interviews and focus groups (2019); grantee monitoring data, document review

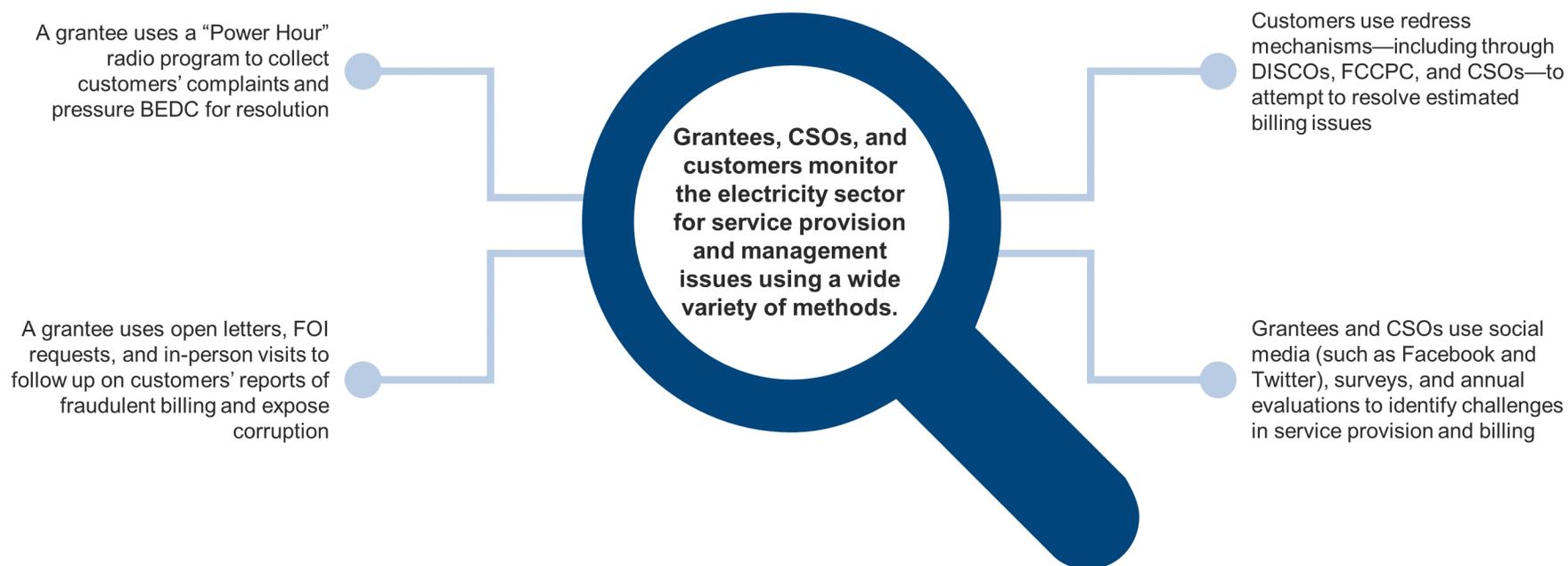


Exhibit 46: New electricity sector policies and regulations (ELEC 12)

Source(s): Qualitative interviews and focus groups (2019); document review, grantee monitoring data

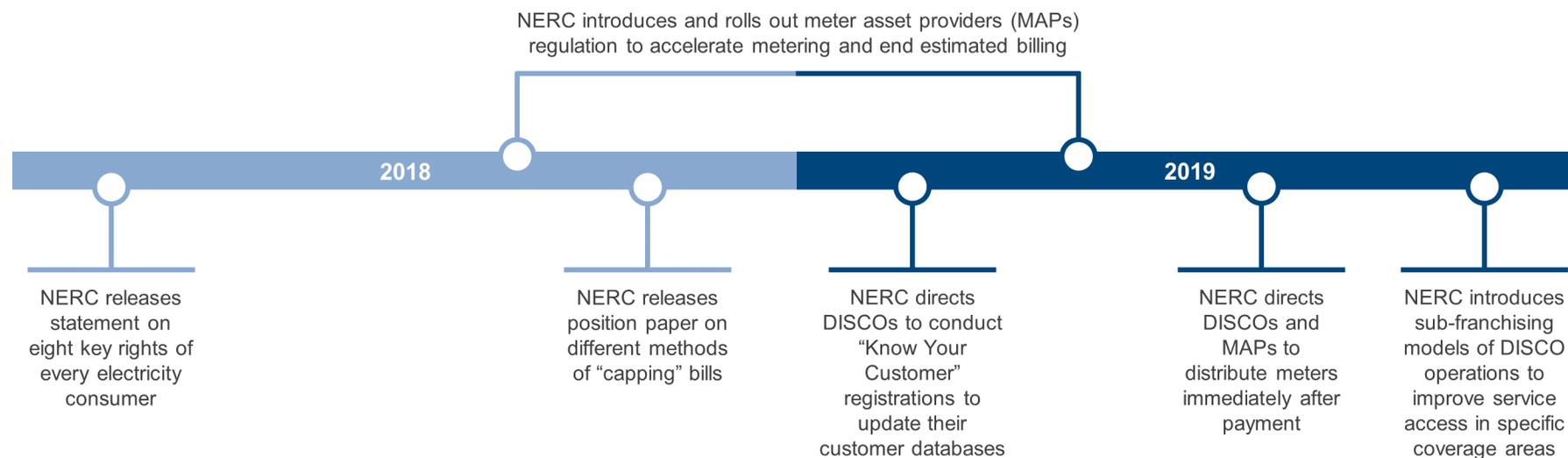


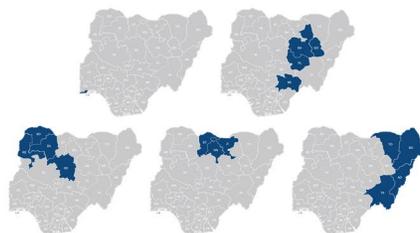
Exhibit 47: Federal activity to sanction DISCOs (ELEC 14.1)

Source(s): Qualitative interviews and focus groups (2019); document review, grantee monitoring data



Ibadan DISCO

Sanction	Fine and suspension
Year	2017
Reason	Inappropriate transactions



Ikeja, Jos, Kaduna, Kano, Yola DISCOs

Sanction	Fine threat
Year	2018
Reason	Failure to pay GenCo bills



Eko, Ikeja, Enugu DISCOs

Sanction	Removed from market
Year	2019
Reason	Failure to meet requirements



Port Harcourt DISCO

Sanction	Directed to comply
Year	2019
Reason	Failure to comply with dispute settlement



Abuja DISCO

Sanction	Fine
Year	2019
Reason	Violation of regulations



Abuja, Benin, Enugu, Ikeja, Kaduna, Kano, Port Harcourt, Yola DISCOs

Sanction	Threatened with license withdrawal unless acceptable explanation is given
Year	2019
Reason	Breach of Power Sector Recovery Plan (PSRP)

Exhibit 48: Target DISCO transparency and accountability measures (ELEC 13)

Source(s): Document review, grantee monitoring data

Theme

Although estimated billing and consistent service provision remained common challenges, both target DISCOs introduced measures to improve communications, customer service, and complaint resolution.

Abuja DISCO	Both Abuja and Benin DISCOs	Benin DISCO
Introduction of automated customer management (InCMS) in December 2018 to support metering, responses, and transactions	Participation in town halls and radio programs Participation in MAPs	Ongoing customer enumeration Retraining of staff to improve customer complaint resolution Whistleblowing policy

Exhibit 49: Corruption disruptors in electricity supply chain since start of On Nigeria (ELEC 15.1 and 19.1)

Source(s): Qualitative interviews and focus groups; document review; grantee monitoring data

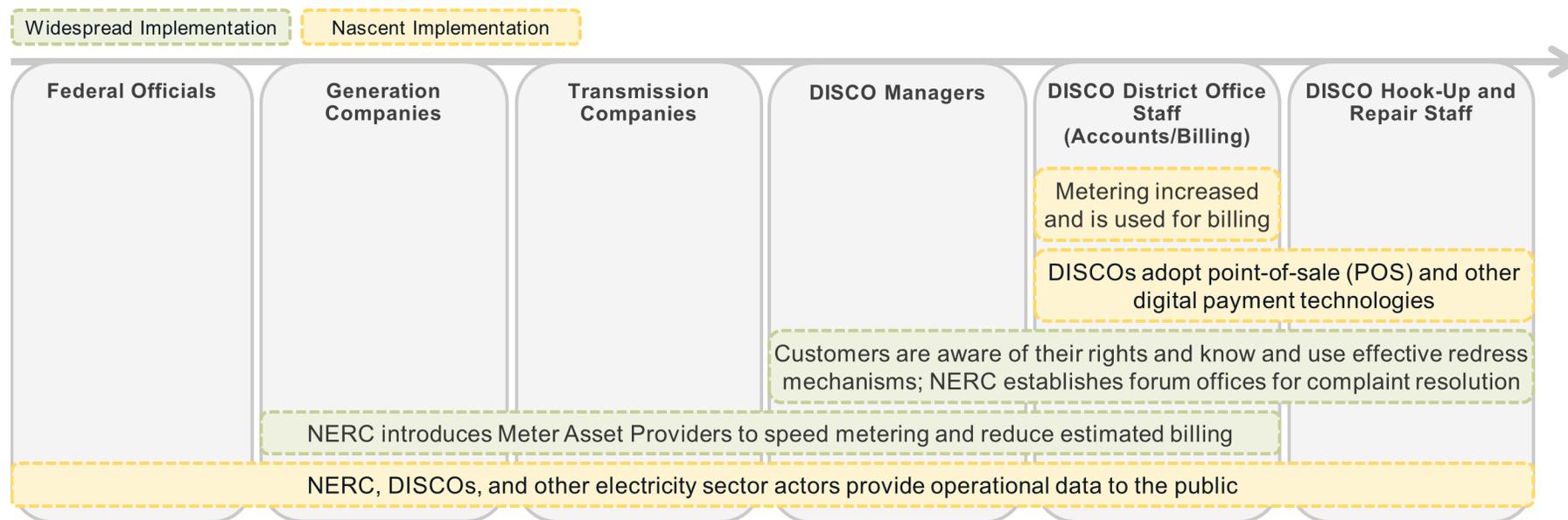


Exhibit 50: Proportion of metered DISCO customers indicating they feel electricity prices are transparent (ELEC 16 & 20)

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: Abuja = 108, Benin = 200, National = 1,516

Sample, 2019: Abuja = 114, Benin = 180, National = 1,354

On a scale of 1 to 5, where 1 is not transparent at all and 5 is very transparent, how transparently do you feel you are being billed for the electricity you use?
Proportion of "transparent" and "very transparent" responses among metered customers

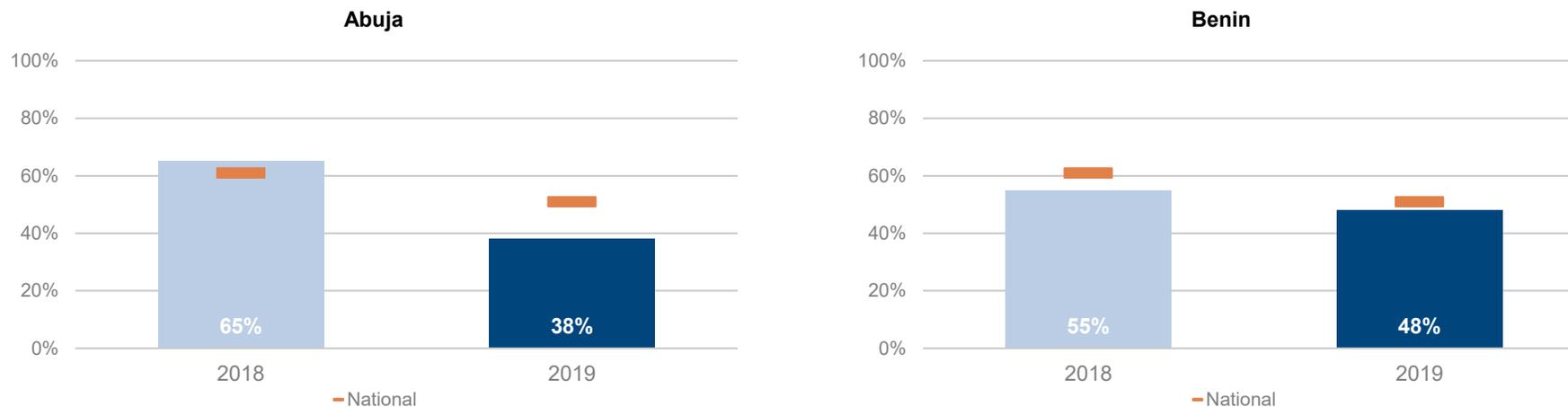


Exhibit 51: Electricity assumptions

Assumption	Level of Confirmation
Sufficient numbers of meters are available.	
Allowing direct purchasing of power from GenCOs does not undermine profitability of DISCOs.	
Big-picture solutions to the electricity sector's woes are proceeding. The <i>Power Sector Recovery Programme</i> developed by the transmission, generation, and distribution companies and the government and supported by the World Bank and other bilateral/multilateral actors proceeds according to plan, and all actors play their respective roles. DISCO leadership is still in place or new leadership is in place, DISCOs are still in private hands, and DISCOs are bailed out if needed.	
DISCOs and transmission/generation companies receive the infusion of capital they need to strengthen and maintain their viability and provide reliable access to electricity: Government consumers (such as the military) pay for electricity services.	
Consumers, as well as government (such as the military) and other customers respond to more reliable service by paying for the services they use: Consumers pay for electricity services they use. Cost-reflective tariffs have been introduced into the system. Customers' payments and adequate investment make it possible for DISCOs to maintain infrastructure, pay upstream operators, and manage operations.	
Generation companies provide adequate power to meet consumer demand: Generation companies have technology, resources, and gas supply. Sabotage does not interfere with the supply of oil.	
Transmission Company of Nigeria is able to transmit adequate power for DISCOs to distribute in the right locations.	
Office of the Vice President monitors implementation of the <i>Power Sector Recovery Programme</i> .	
Government, FCCPC, development banks, and private companies discuss ways to improve provision of information about metering, tariffs, and DISCOs' performance.	
DISCOs meter and monitor metering.	
Customers/consumers refrain from bypassing/illegally connecting and committing other kinds of petty corruption.	
Confirmed: Mixed: Rejected: Insufficient Evidence:	

Exhibit 53: Grantee monitoring activities tracking federal ACJA compliance (CJ 11)

Source(s): Grantee monitoring data



Exhibit 54: 14 states where grantees serve on a state ACJ monitoring committee (CJ 7)

Source(s): Grantee monitoring data; document review

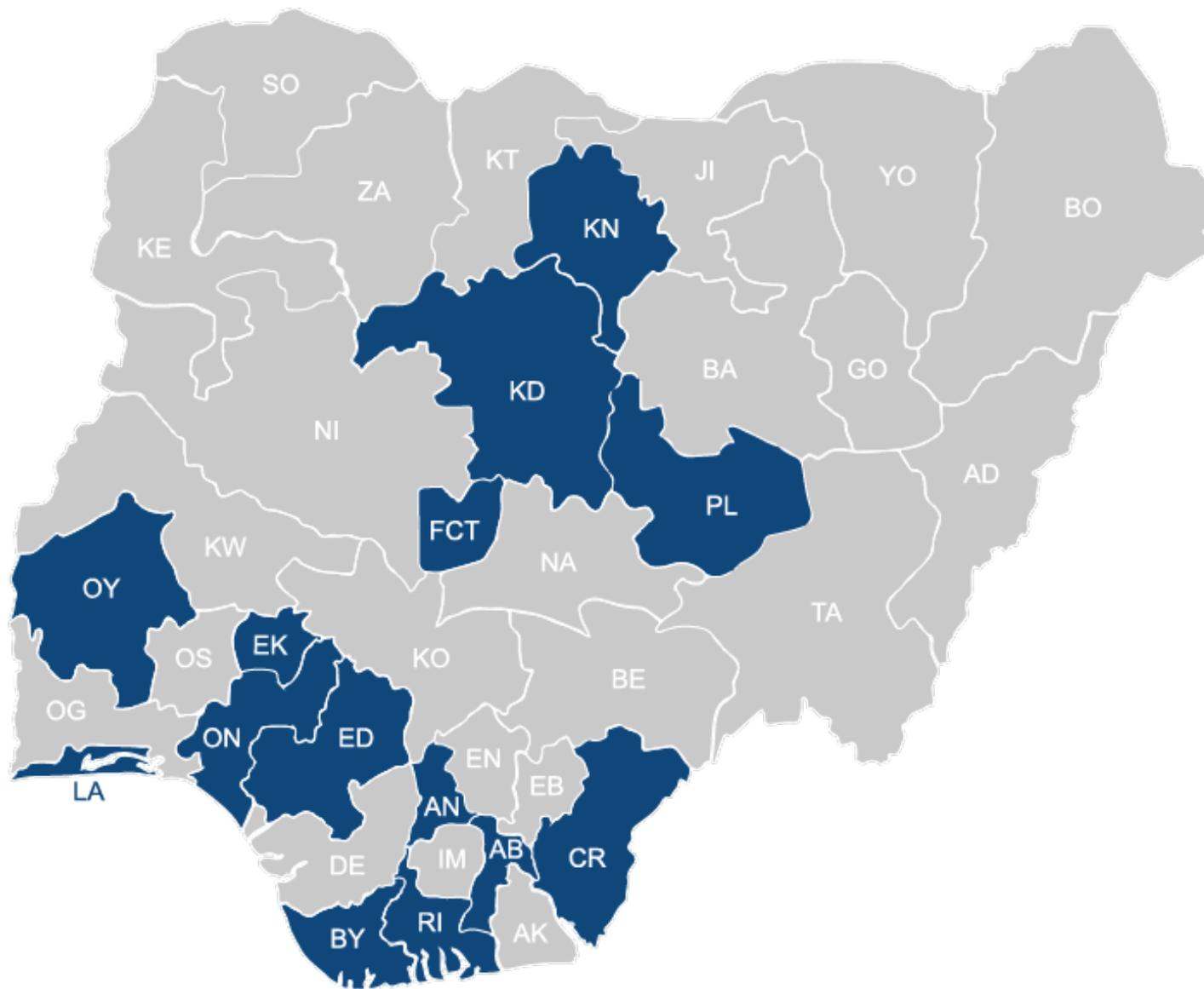


Exhibit 55: Timeline of federal anticorruption laws, policies, and implementation milestones, complementary to ACJA (CJ 14, STRAT 9)

Source(s): Document review; grantee monitoring data

2015	2016	2017	2018	2019
<p>n/a</p> <p>Economic and Financial Crimes Commission (Asset Recovery) Act implemented (passed 2004), Buhari renews commitment and accelerates implementation</p> <p>Aug</p> <p>Presidential Advisory Committee Against Corruption (PACAC) established</p>	<p>n/a</p> <p>Treasury Single Account implemented (est. in 2012)</p> <p>May</p> <p>Nigeria joins Open Government Partnership</p> <p>Nov</p> <p>Presidential Committee on Asset Recovery established</p> <p>Dec</p> <p>Presidential Initiative on Continuous Audit</p>	<p>May</p> <p>Executive Bill for the Mutual Legal Assistance in Criminal Matters passed into law</p> <p>Jun</p> <p>Witness Protection Program passed into law</p> <p>Jul</p> <p>Whistleblower Protection Program Executive Policy signed</p> <p>Federal Executive Council approves National Anti-Corruption Strategy: 2017–2021 (Policy)</p> <p>Aug</p> <p>Civil Society Observatory established</p> <p>Sep</p> <p>Corruption and Financial Crimes Cases Trial Monitoring Committee established</p> <p>Corruption Cases Trial Monitoring Committee (COTRIMCO) established to monitor special anticorruption courts</p> <p>Nov</p> <p>Special Anticorruption Courts designated by the executive branch</p> <p>n/a</p> <p>Buhari administers directive to state governors to release prisoners unnecessarily detained without due process</p>	<p>Mar</p> <p>All states must adhere to the Freedom of Information Act (passed in 2011) affirmed by Court of Appeal</p> <p>Federal Audit Service Commission Bill passed National Assembly (failed to become law)</p> <p>Jun</p> <p>Prosecution of Offences Bill considered by National Assembly (failed to become law)</p> <p>Jul</p> <p>Nigerian Financial Intelligence Unit Bill passed into law</p> <p>Preservation of Suspicious Assets Connected with Corruption (Executive Order No. 6) signed</p> <p>Proceeds of Crime Bill passed by House of Representatives (failed to become law)</p> <p>Sep</p> <p>Attorney General inaugurates 17-member National Anti-Corruption Strategy Monitoring and Evaluation Committee</p>	<p>Jun</p> <p>Mutual Assistance in Criminal Matters Act 2019 passed into law</p> <p>Jul</p> <p>Proceeds of Crime Management Agency (Establishment) Bill introduced to legislature*</p> <p>Dec</p> <p>Transparency Policy & Open Treasury Portal</p> <p>Beneficial Ownership Portal</p>

*As of October, 2019

Criminal Justice Elements

Exhibit 56: EFCC corruption convictions by year (CJ 16)

Source(s): Document review

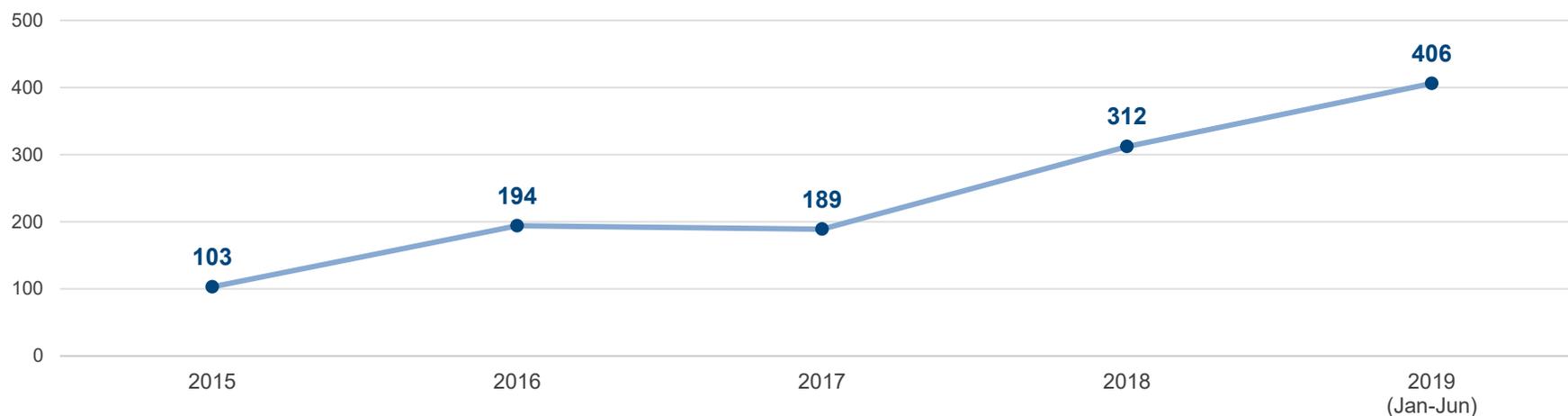
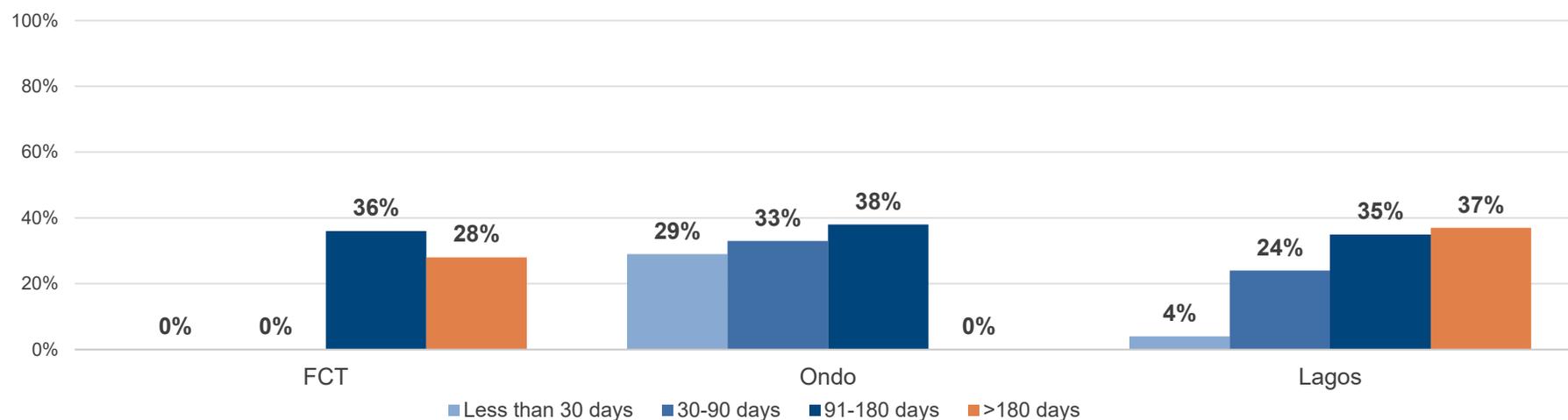


Exhibit 57: Average number of days to dispose criminal cases according to surveyed judiciary members, 2018 Q3 (CJ 18)³¹

Source(s): Grantee monitoring data



³¹ Complete data from FCT Abuja not reported by grantee.

Exhibit 58: Grantee skill building for legal professionals to work with the ACJA (CJ 3)

Source(s): Grantee monitoring data; qualitative interviews and focus groups (2019)

Sample, 2019: 12 (CSOs, federal and state judges and prosecutors)

	Training manuals	E-learning system	ACJA training and seminars	 Illustrative Quotes
Judges	X		X	Speaking as a judge, we've had a number of seminars [such as] continuing legal education seminars organized around the ACJA Provisions... – Federal Judge, 2019
Magistrates	X		X	
Prosecutors	X	X	X	Personally, I have been part of a training organized for lawyers in the ministry, I have also made a presentation in a seminar organized by the NBA, which was attended by members of the bar and the bench, i.e., judges, magistrates, lawyers... I was on a panel discussing the innovations of the ACJA; we identified some of the issues, challenges, and loopholes that we felt were there and everybody had their own perspective. – State Prosecutor, 2019
Defense Lawyers	X	X	X	We have been having lots of trainings [sic] by different organizations on ACJA with different modules, and on the implementation of the Federal ACJA. We have a lot of our prosecutors [who] have gone through several trainings [sic] organized by different organizations... But there is no general training module that is generally adopted, as every organization that has approached us... they have all come with their own module and all that, and training styles and all that. Though they are all related because ACJA remain[s] the same. You cannot change the contents of the law, so they are similar. – Federal Prosecutor, 2019
ACJMC members	X			

Exhibit 59: Criminal Justice assumptions

Assumption	Level of Confirmation
CSOs advocate for effective anticorruption policy by providing technical support and information to the government upon request or invitation by a legislative body.	
State assemblies adopt state versions of the ACJA that include its essential, unifying, and progressive elements.	
Federal government passes criminal justice-related anticorruption laws and policies complementary to the ACJA.	
Other partners support capacity building of other criminal justice system agencies (e.g., police and prisons) to ensure that corruption cases are followed from arrest through prison.	

Confirmed: 
 Mixed: 
 Rejected: 
 Insufficient Evidence: 

Exhibit 60: Total keyword mentions in corruption and anticorruption reporting by quarter (includes grantee sources) (MJ 5.2)

Source(s): Media monitoring—conventional media



Exhibit 61: Volume of investigative reporting by grantee media outlets (MJ 5.1)

Source(s): Media monitoring—investigative journalism

In 2016, **6** of the **298** sampled grantee articles (2%) qualified as investigative reporting

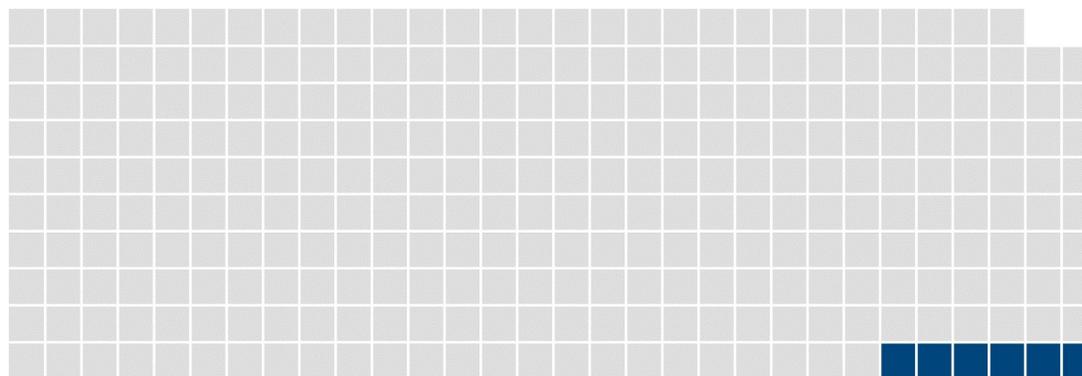


Exhibit 62: On Nigeria grantee media reporting leading to government response (MJ 8)

Source(s): Grantee monitoring data

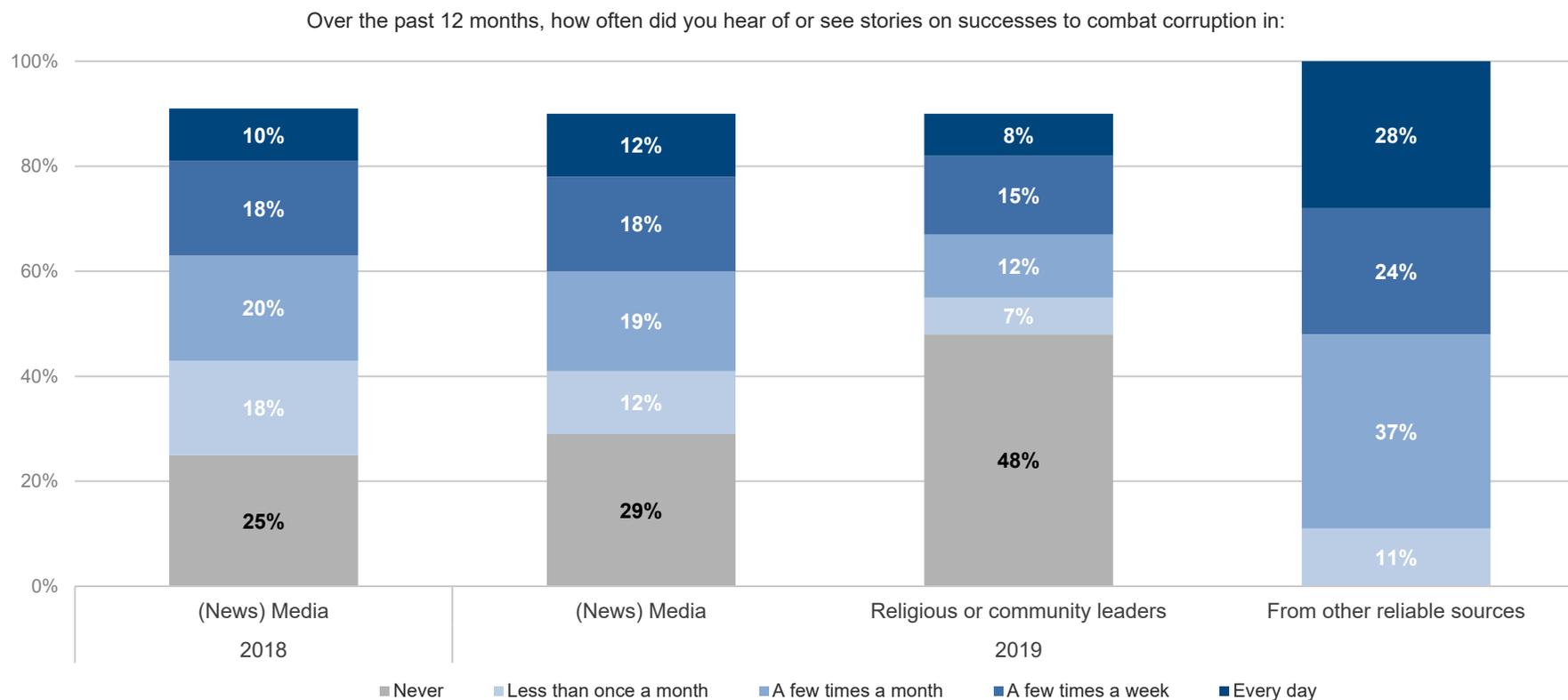
2017		2018	
<p>Mar</p> <p>After Punch reported cases of massive fraud, government stopped funding YouWin program</p>	<p>Dec</p> <p>TVC reporting leads to Lagos UBEC construction work</p>	<p>Jan</p> <p>ICIR, “The Appalling, Risky State Of Nigeria’s Multi-Billion Naira Nuclear Technology Centre” results in contractor re-mobilization</p>	<p>Jul</p> <p>Daily Trust investigation leads to sanctioned Ibadan DISCO</p>
<p>Jun</p> <p>Cable News’ “Queens’ College” water pollution saga spurs government investigation</p>	<p>Daily Trust exposed illegal power disconnections, AEDC made adjustments in response</p>	<p>After ICIR published investigation on the dilapidated state of the Nuclear Technology Centre, contractors were mobilized back on site</p>	<p>Daily Trust, “Makurdi electricity customers kick over crazy bills” results in DISCO intervention</p>
<p>Sep</p> <p>Daily Trust investigation into National Library use of funds spurs renewed renovation work</p>	<p>Cable News conducts investigation on disaster assistance procurement irregularities, deputy governor promises to mobilize contractors</p>	<p>Feb</p> <p>Cable News’ investigation into DISCO extortion leads to IBEDC investigation</p>	<p>Daily Trust, “Rivers’ Multi-billion Naira Power Project Rots Away”, state government establishes probe to investigate</p>
<p>Nov</p> <p>Daily Trust stories about HGSF cook shortages pressured Bauchi state to engage more cooks</p>		<p>After Premium Times review of govt over-spending on website design, govt officials promise to review and re-design</p>	<p>Aug</p> <p>Media alliance investigates and helps amplify message to release journalist Jones Abiri (re-arrested in March 2019)</p>
<p>Photojournalist documented poor state of electricity infrastructure, leading to transformer repairs</p>		<p>Premium Times investigation into UBEC spending at Oyo school leads to lawmaker action</p>	<p>Sep</p> <p>Daily Trust, “How govt’s negligence keeps Jigawa almajirai in streets” prompts response from government, pledge to investigate</p>
<p>ICIR report on mismanagement spurs Nasarawa state official to facilitate completion of primary healthcare projects</p>		<p>May</p> <p>Guardian Newspaper publishes UBEC investigation, triggers response from the State Universal Basic Education Board</p>	<p>Oct</p> <p>After ICIR report on Abuja bridges damage and project material theft, renovations resume</p>

Exhibit 63: Proportion of citizens who are aware of positive outcomes of anticorruption actions (MJ 9.1)³²

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: 7,827

Sample, 2019: 5,067



³² A range of 1-10 percent of respondents across categories and years either did not know or refused to answer.

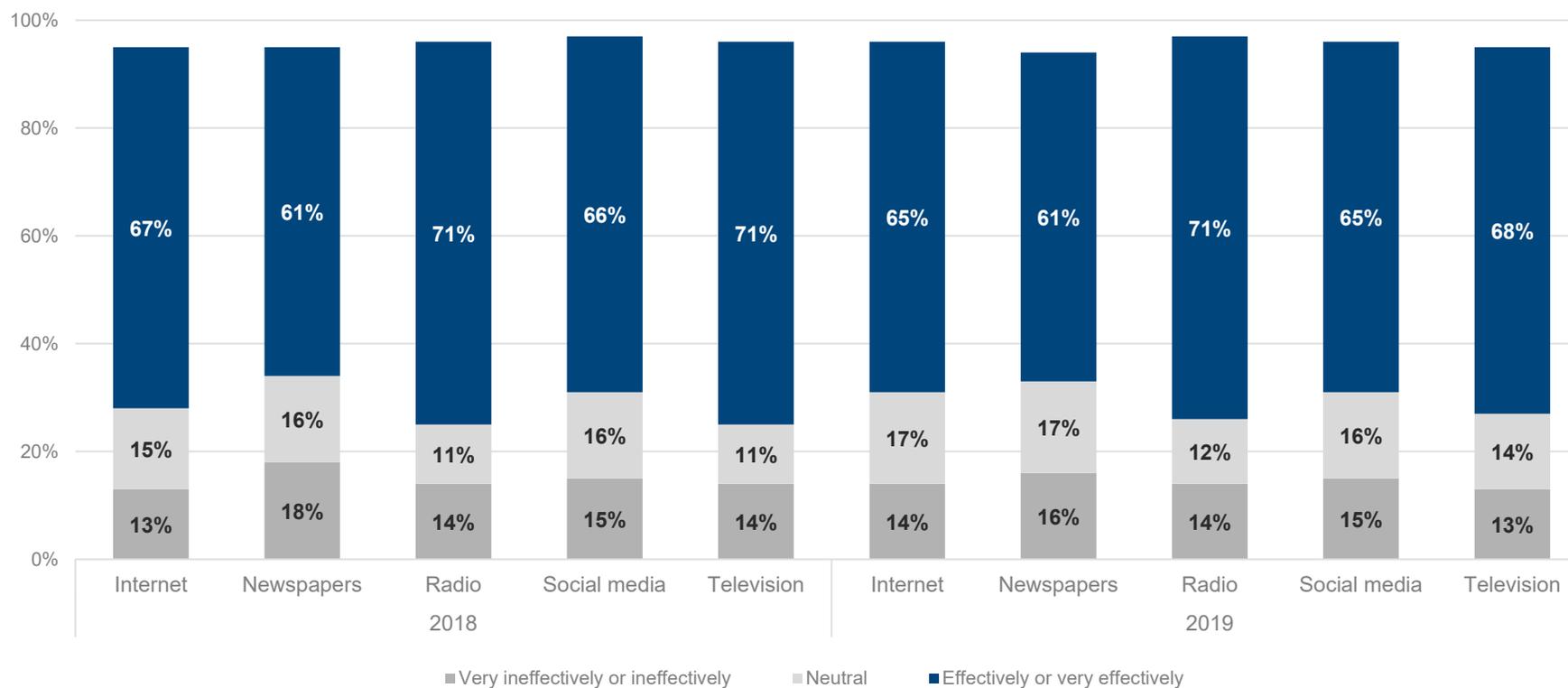
Exhibit 64: Proportion of citizens stating they view media as reliable source of information on corruption and anticorruption actions (MJ 10.1)³³

Source(s): EL Partner National Telephone Survey (2018, 2019)

Sample, 2018: radio: 6,955; television: 6,525; newspapers: 3,600; internet: 5,180; social media: 5,133

Sample, 2019: radio: 4,313; television: 3,931; newspapers: 2,090; internet: 3,124; social media: 3,144

On a scale of 1 to 5, where 1 is very ineffectively and 5 is very effectively, how effectively does each of the following media sources cover efforts to combat corruption?



³³ A range of 3 to 5 percent of respondents across categories and years either did not know, refused to answer, or did not use.

Exhibit 65: Media and Journalism assumptions

Assumption	Level of Confirmation
Citizens view media as a reliable source of information.	
Citizens have demand for reporting on corruption and progress of government and business anticorruption promises.	
Independent media outlets have the organizational capacity (funds, business models) to support data-driven investigative reporting.	
Public interest in using social media for social change is high or can be encouraged by CSOs.	
A wide range of citizens have access to On Nigeria–supported journalism.	
Journalists and civil society are not yet collaborating adequately on corruption and anticorruption issues.	

Confirmed: Mixed: Rejected: Insufficient Evidence:

Annex 2: On Nigeria Theory of Change and Measures

The ultimate goal of On Nigeria’s efforts is to reduce corruption by building accountability, transparency, and good governance. On Nigeria hypothesizes that corruption can be reduced by (1) reducing incidences of citizens’ everyday experiences and exposure to corruption in two key sectors, (2) using the government’s anticorruption campaign as a springboard for a national movement, and (3) helping citizens see progress in the fight against corruption. Systems-focused criminal justice reform, strengthening of media and journalism, expanding the number of anticorruption champions, and shifting of social norms complement the sectoral accountability portfolios.

On Nigeria’s theory of change posits that **IF** civil society organizations (CSOs), journalists, and other actors have the capacity and work together to expose corruption and demand action (“voice”), **AND IF** actors such as schools, distribution companies (DISCOs), and government officials in the targeted sectors and the judiciary at state and federal levels have capacity and incentives to create and enforce appropriate anticorruption measures (“teeth”), **THEN** successful anticorruption initiatives will take place, reducing corruption and improving service delivery in targeted sectors and geographic locations. By experiencing tangible improvements in anticorruption actions, and education and electricity services as a result of the government’s and citizens’ efforts, Nigerians’ expectations about corruption will change. They will be less likely to tolerate corruption related to electricity and education services, and demand both the services they are entitled to and greater anticorruption efforts. **IF** stakeholders’ capacity, influence, and demand for accountability and transparency are increased and sustained, **THEN** gains will be institutionalized.

Each module has its own theory of change and, together, they roll up to the strategy-level theory of change, which also includes cross-cutting activities that seek to influence social norms around corruption and complement the “voice” demands and “teeth” actions within the modules. The following pages present the theories of change graphically and identify the interim outcomes, long-term outcomes, and impacts.³⁴ Each theory of change is followed by a graphic outlining the measures On Nigeria is using to assess progress. Note that not all outcomes have a measure.

³⁴ **Outcomes** are the nearer term and intermediate changes in attitudes and actions of target audiences (e.g., individuals, communities, organizations, and policies) that stem directly from the strategy’s activities. *Interim outcomes* are results expected to be achievable within 3 years of the strategy initiation, and are categorized by the strategy’s four approaches: “voice,” “teeth,” capacity, and collaboration. *Long-term outcomes* are results in *On Nigeria’s* targeted areas, and reflect systems performance, service delivery, and citizens’ expectations; long-term outcomes are dependent on interim outcomes, but are also affected by assumptions underlying the theory of change and *On Nigeria’s* context. Some long-term outcomes should be visible in 3 years.

Impacts are the longer-term aspirational changes in the population and systems where the strategy operates. These changes represent the overall significance and value of the strategy. For the *On Nigeria* sectoral modules, impact relates to the spread of results beyond the initial geographical areas of focus to broader, national-level changes in reducing corruption and increasing trust in government.

Exhibit 66: Strategy-level theory of change

STRATEGY LEVEL INTERIM OUTCOMES: Corruption is confronted.

See modules for interim outcomes related to UBEC, HGSF, ELEC, Criminal Justice, and Media and Journalism.



LONG-TERM OUTCOMES: Corruption is reduced in specific sectors and geographies.

Government and other actors enforce anticorruption rules and implement processes uniformly.

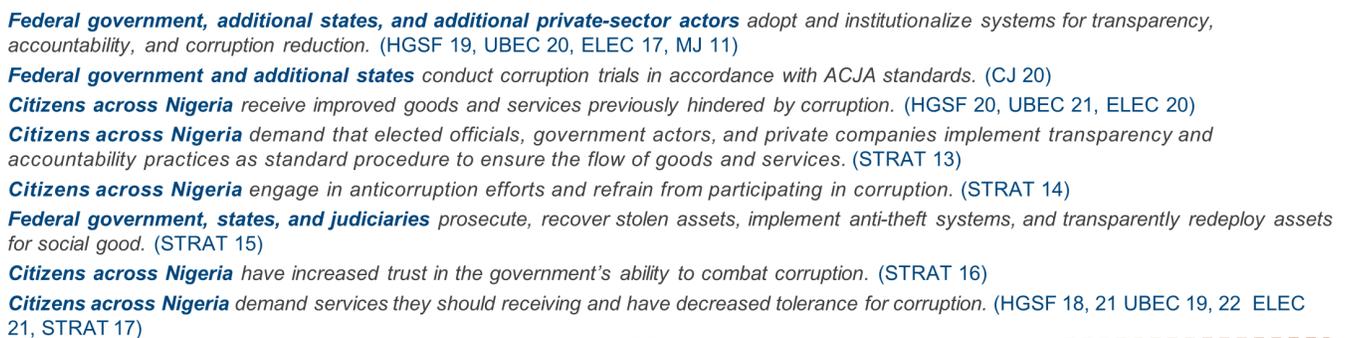


Experience of improved systems and greater access to services changes citizens’ expectations about corruption.

Citizens in targeted areas demand services they should be receiving and have decreased tolerance for corruption. *Outcomes: HGSF 14 and 17 UBEC 15 and 18 ELEC 16 and 17, STRAT 12*

Spread strategies, including journalism and media, amplify anticorruption successes and change all actors’ commitment to action across Nigeria.

IMPACT: Gains are spread and institutionalized.



Through stronger governance and civic participation norms nationwide, anticorruption efforts are sustained.

GOAL: CORRUPTION ACROSS NIGERIA IS REDUCED

Exhibit 67: Theory of change to disrupt corruption in the HGSF program



INTERIM OUTCOMES
Do “voice” and “teeth” actors have the capacity and knowledge they need?

- 1** CSOs, SBMCs, and journalists/media are aware of entitlements, government funds, and processes related to the HGSF.
- 2** CSOs, SBMCs, and journalists/media know how to monitor, investigate, and advocate for transparent procurement and implementation of HGSF services.
- 3** State governments know how to reduce the risk of corruption in feeding programs.

- 4** Bilateral/multilateral agencies and other key actors leverage relationships to encourage states to enroll in the HGSF.
- 5** State governments and CSOs coordinate in monitoring HGSF implementation.
- 6** **Cross-Cutting: Journalists/media and CSOs** share information about the government’s HGSF anticorruption promises, activities, and wins.



INTERIM OUTCOMES
Are actors collaborating to leverage success and build pressure for change?



INTERIM OUTCOMES
Are “voice” actors engaging in advocacy and monitoring?

- 7** More CSOs and SBMCs demand/advocate for transparency and accountability related to the HGSF.
- 8** CSOs and journalists/media monitor the flow of HGSF funds and services.
- 9** CSOs and journalists/media educate SBMCs and school personnel about HGSF policies and parents’/schools’ rights.
- 10** CSOs, SBMCs, school personnel, and journalists/media monitor the delivery of government-promised feeding programs at schools and demand the HGSF services their children should be receiving.

- 11** Federal and state government(s) implement corruption-reduction practices in the HGSF program, e.g. establishing and operationalizing clear structures, inclusive implementation committees (i.e. TAC), and inclusive monitoring and reporting frameworks
- 12** Federal government sanctions states that do not comply with HGSF guidelines.
- 13** Federal and state governments sanction suppliers violating HGSF contractual obligations.



INTERIM OUTCOMES
Are “teeth” actors operating transparently and holding others accountable?



LONG-TERM OUTCOMES
Are improvements institutionalized and social norms shifted in targeted states?

- 14** Citizens in targeted states demand HGSF program services their children should be receiving.
- 15** Actors along the supply chain implement corruption-reduction practices, and use HGSF program funds according to guidelines and contractual obligations in targeted states as standard procedure.
- 16** Schoolchildren in targeted states receive HGSF benefits that have been hindered by corruption.
- 17** Citizens in targeted states have decreased tolerance for corruption related to HGSF services.

- 18** Citizens across Nigeria demand the HGSF services their children should be receiving.
- 19** Actors along the supply chain implement corruption-reduction practices, and use HGSF program funds according to guidelines and contractual obligations across Nigeria as standard procedure.
- 20** Schoolchildren across Nigeria receive HGSF benefits that have been hindered by corruption.
- 21** Citizens across Nigeria have decreased tolerance for corruption related to HGSF services.



IMPACTS
Are improvements spread and social norms shifted nationwide?

Exhibit 68: Measures for the disruption of corruption in the HGSF program

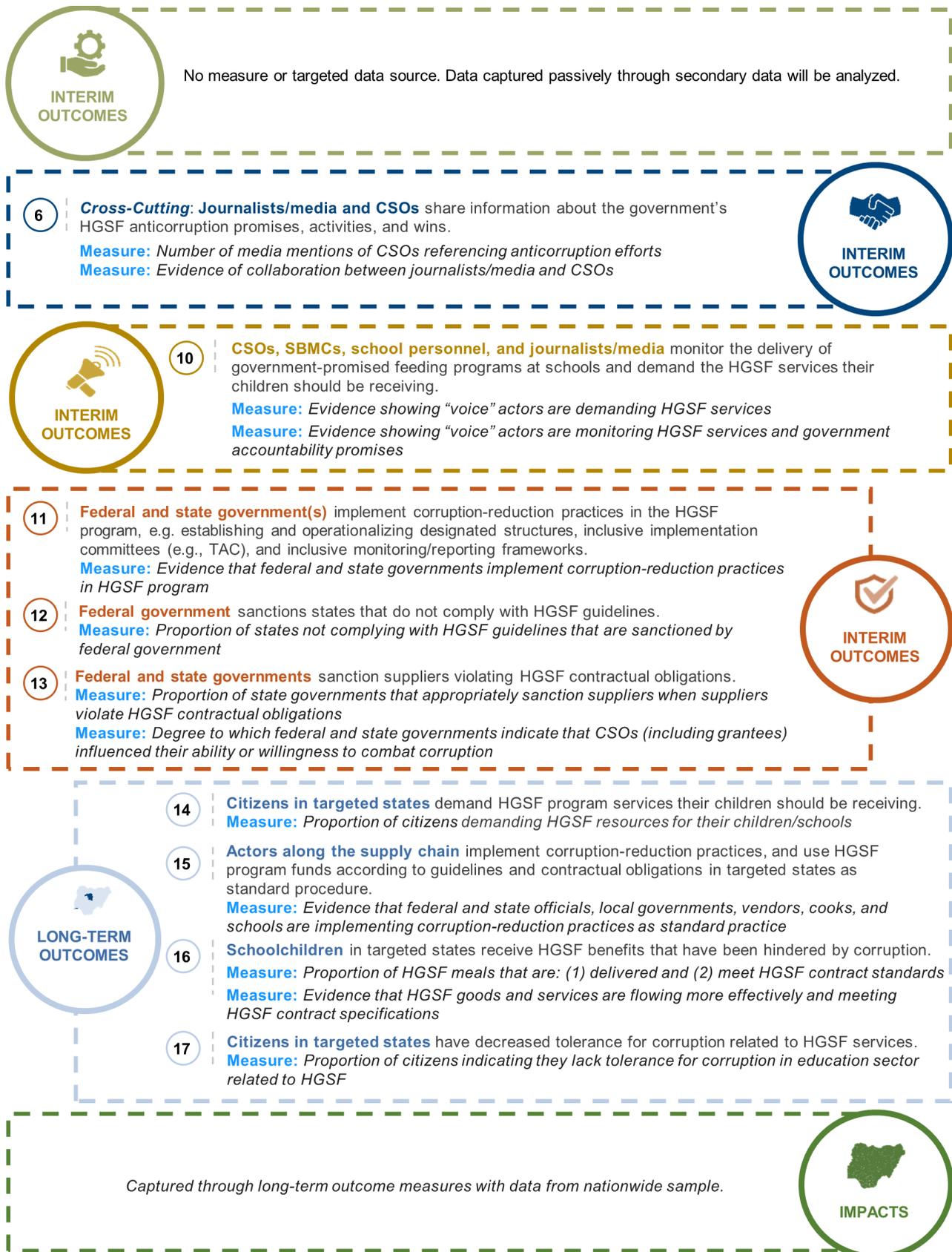
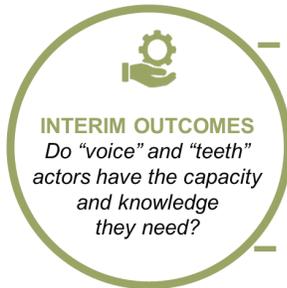


Exhibit 69: Theory of change to disrupt corruption in the UBEC program



- 1 CSOs, SBMCs, and journalists/media are aware of entitlements, government funds, and processes related to UBEC and SUBEBs.
- 2 CSOs, SBMCs, and journalists/media know how to monitor, investigate, and advocate for action on OCDS and transparent flow of funds.
- 3 UBEC and targeted SUBEBs know how to use the OCDS.

4

Bilateral/multilateral agencies and other key actors leverage relationships to encourage UBEC and SUBEBs to “pick up” funds.

5

Oversight and coordination agencies (Bureau for Public Sector Reform, Bureau for Public Procurement), state governors, and CSOs work in concert to ensure that UBEC and SUBEBs use OCDS.

6

Cross-Cutting: Journalists/media and CSOs share information about and collaborate on government anticorruption promises, activities, and wins in education.



INTERIM OUTCOMES
Are actors collaborating to leverage success and build pressure for change?



- 7 **More CSOs, SBMCs, parent groups and school officials** demand/advocate for transparency and accountability related to UBEC, SUBEBs, and vendors
- 8 **CSOs and journalists/media** monitor the flow of UBEC and SUBEB funding.
- 9 **CSOs and journalists/media** use information from OCDS and other sources to educate parents and school personnel about education funds and policies.
- 10 **CSOs, SBMCs, school personnel, and journalists/media** monitor the delivery of promised UBEC-supported education resources and demand UBEC education resources for their schools.

11

UBEC monitors and ensures appropriate use of funds by SUBEBs.

12

Targeted SUBEBs pilot, adopt, and roll out the OCDS.

13

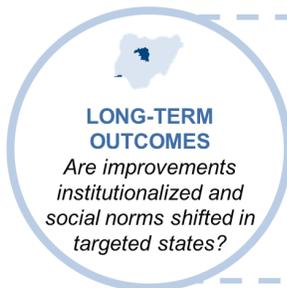
UBEC, targeted SUBEBs, and vendors provide accurate information about procurement and appropriation processes to the public, CSOs, media, and relevant government agencies.

14

UBEC sanctions SUBEBs and vendors for inappropriate use of funds.



INTERIM OUTCOMES
Are “teeth” actors operating transparently and holding others accountable?



- 15 **Citizens in targeted states** demand UBEC resources for their children’s schools.
- 16 **Actors along the supply chain for UBEC resources** ensure regular, reliable, and transparent flow and use of allocated funds to schools in targeted states.
- 17 **UBEC-supported goods and services** that have been hindered by corruption are delivered to schools in targeted states.
- 18 **Citizens in targeted states** have decreased tolerance for corruption related to UBEC resources.

19

Citizens across Nigeria demand UBEC education resources for their children.

20

Actors along the supply chain for UBEC resources across Nigeria ensure regular, reliable, and transparent flow and use of allocated funds to schools.

21

UBEC-supported goods and services that have been hindered by corruption are delivered to schools across Nigeria.

22

Citizens across Nigeria have decreased tolerance for corruption related to UBEC resources.



IMPACTS
Are improvements spread and social norms shifted nationwide?

Exhibit 70: Measures for the disruption of corruption in the UBEC program



No measure or targeted data source. Data captured passively through secondary data will be analyzed.

- 6 | **Cross-Cutting: Journalists/media and CSOs** share information about and collaborate on government anticorruption promises, activities, and wins in education.

Measure: Number of media mentions of CSOs referencing anticorruption efforts

Measure: Evidence of collaboration between journalists/media and CSOs



- 10 | **CSOs, SBMCs, school personnel, and journalists/media** monitor the delivery of promised UBEC-supported education resources and demand UBEC education resources for their schools.

Measure: Evidence showing “voice” actors are demanding UBEC services

Measure: Evidence showing “voice” actors are monitoring UBEC services and government accountability promises

- 11 | **UBEC** monitors and ensures appropriate use of funds by SUBEBs.

Measure: Evidence that UBEC has changed the way they supervise SUBEBs

- 12 | **Targeted SUBEBs** pilot, adopt, and roll out the OCDS.

Measure: Evidence that targeted SUBEBs pilot, adopt, and roll out the OCDS with adequate support and maintenance

- 13 | **UBEC, targeted SUBEBs, and vendors** provide accurate information about procurement and appropriation processes to the public, CSOs, media, and relevant government agencies.

Measure: Number of UBEC, SUBEBs, and vendors providing clear, up-to-date information on procurement and appropriation processes

- 14 | **UBEC** sanctions SUBEBs and vendors for inappropriate use of funds.

Measure: Proportion of SUBEBs sanctioned for inappropriate use of counterpart funds

Measure: Number of vendors sanctioned for inappropriate use of counterpart funds

Measure: Degree to which federal government indicates that CSOs (including grantees) influenced their ability or willingness to combat corruption



- 15 | **Citizens in targeted states** demand UBEC resources for their children’s schools.

Measure: Proportion of citizens demanding UBEC resources for their children/schools

- 16 | **Actors along the supply chain for UBEC resources** ensure regular, reliable, and transparent flow and use of allocated funds to schools in targeted states.

Measure: Evidence that UBEC, SUBEBs, local governments, vendors, and schools ensure the flow and use of allocated funds through supply chains to schools

- 17 | **UBEC-supported goods and services** that have been hindered by corruption are delivered to schools in targeted states.

Measure: Proportion of goods and services allocated to schools by UBEC and SUBEBs actually received by schools

Measure: Evidence that UBEC goods and services are flowing more effectively and meeting UBEC contract specifications

- 18 | **Citizens in targeted states** have decreased tolerance for corruption related to UBEC resources.

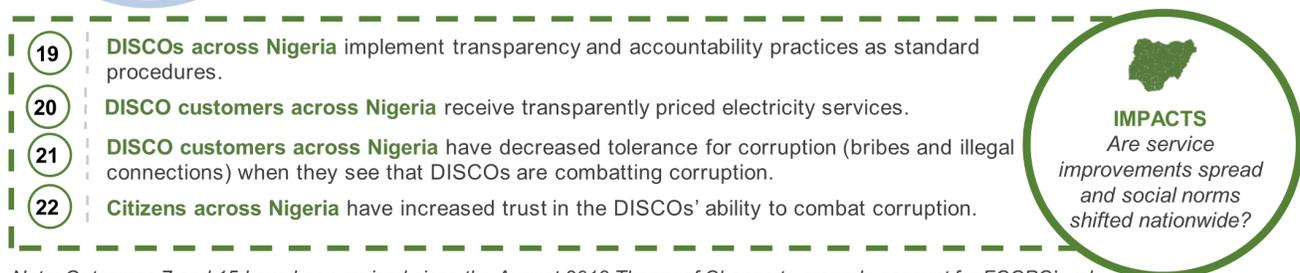
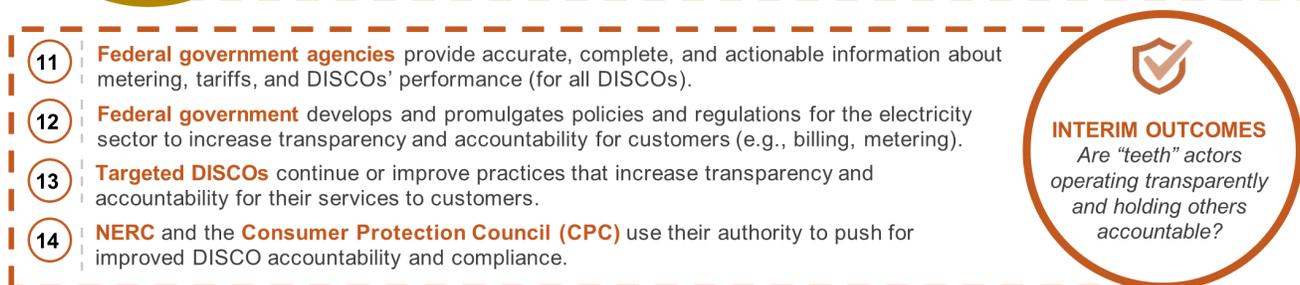
Measure: Proportion of citizens indicating they lack tolerance for corruption in education sector related to UBEC resources



Captured through long-term outcome measures, with data from nationwide sample.



Exhibit 71: Theory of change to disrupt corruption in electricity distribution



Note: Outcomes 7 and 15 have been revised since the August 2018 Theory of Change to properly account for FCCPC's role.

Exhibit 72: Measures for the disruption of corruption in electricity distribution



Exhibit 73: Theory of change to strengthen the criminal justice system in its fight against corruption



INTERIM OUTCOMES
Do “voice” and “teeth” actors have the capacity and knowledge they need?

- 1 CSOs and journalists/media know the content of the ACJA and other proposed anticorruption policies.
- 2 Targeted legal practitioners and judges know core elements of the ACJA, generally and as related to corruption.
- 3 Legal institutions, judicial institutions, and CSOs develop tools and modules on the ACJA to be incorporated into core training for stakeholders, and mandate/use them in core training curricula and continuing legal education.
- 4 State assemblies have information and support they need to consider adopting the ACJA.
- 5 Federal government has information and support it needs to consider anticorruption legislation (complementary to the ACJA).



INTERIM OUTCOMES
Are actors collaborating to leverage success and build pressure for change?

- 6 Criminal justice and anticorruption agencies demonstrate improved coordination.
- 7 CSOs participate in federal and state Administration of Criminal Justice Monitoring Committees
- 8 Cross-Cutting: Journalists/media and CSOs share information about government anticorruption promises, activities, and wins related to criminal justice.



INTERIM OUTCOMES
Are “voice” actors engaging in advocacy and monitoring?

- 9 CSOs advocate for the functioning of the federal Administration of Criminal Justice Monitoring Committee.
- 10 CSOs advocate for the strengthening of general federal anticorruption policies (complementary to the ACJA).
- 11 CSOs and journalists/media monitor compliance with the ACJA in anticorruption cases at state and federal levels.
- 12 CSOs provide technical support and information to states considering ACJ laws and complementary anticorruption policies upon request.



INTERIM OUTCOMES
Are “teeth” actors operating transparently and holding others accountable?

- 13 The Federal Administration of Criminal Justice Monitoring Committee monitors and supports compliance with the ACJA.
- 14 Federal government considers criminal justice-related anticorruption laws and policies (complementary to the ACJA).
- 15 State assemblies consider ACJA adoption with essential, unifying, and progressive elements.



LONG-TERM
Are beneficial laws and policies adopted and operationalized?

- 16 Federal government and the judiciary implement criminal justice-related anticorruption policies and practices.
- 17 State and federal Administration of Criminal Justice Monitoring Committees monitor and support states’ implementation and compliance with their versions of the ACJA.



IMPACTS
Are anticorruption cases fully enforced in accordance with institutionalized legal standards?

- 18 State and federal judiciaries and prosecutors conduct more trials, including corruption cases, according to ACJA standards.

Exhibit 74: Measures for strengthening the criminal justice system in its fight against corruption

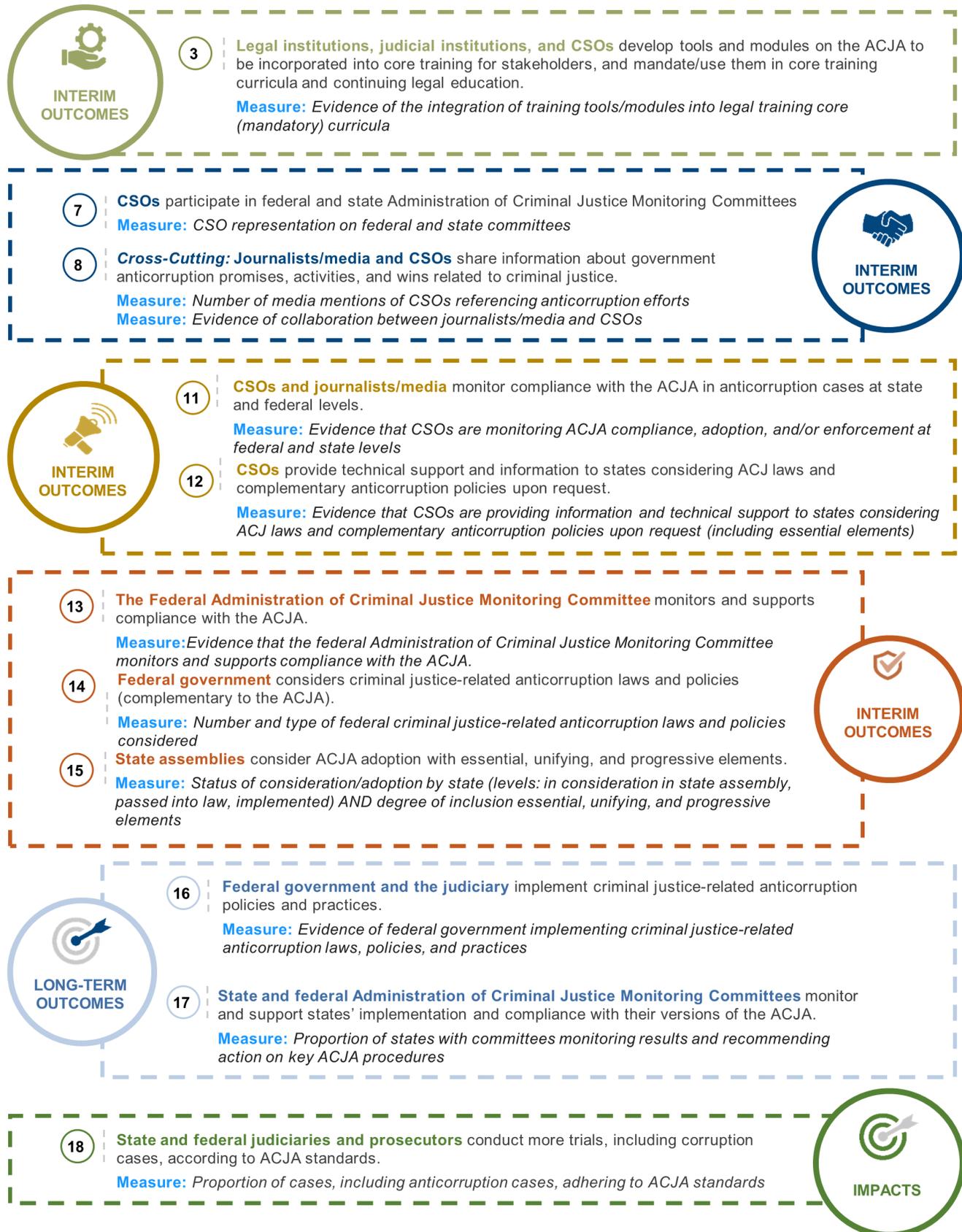


Exhibit 75: Theory of change to strengthen the field of media and journalism in the fight against corruption



Exhibit 76: Measures for strengthening the field of media and journalism in the fight against corruption



Exhibit 77: Theory of change to strengthen cross-cutting fields in the fight against corruption

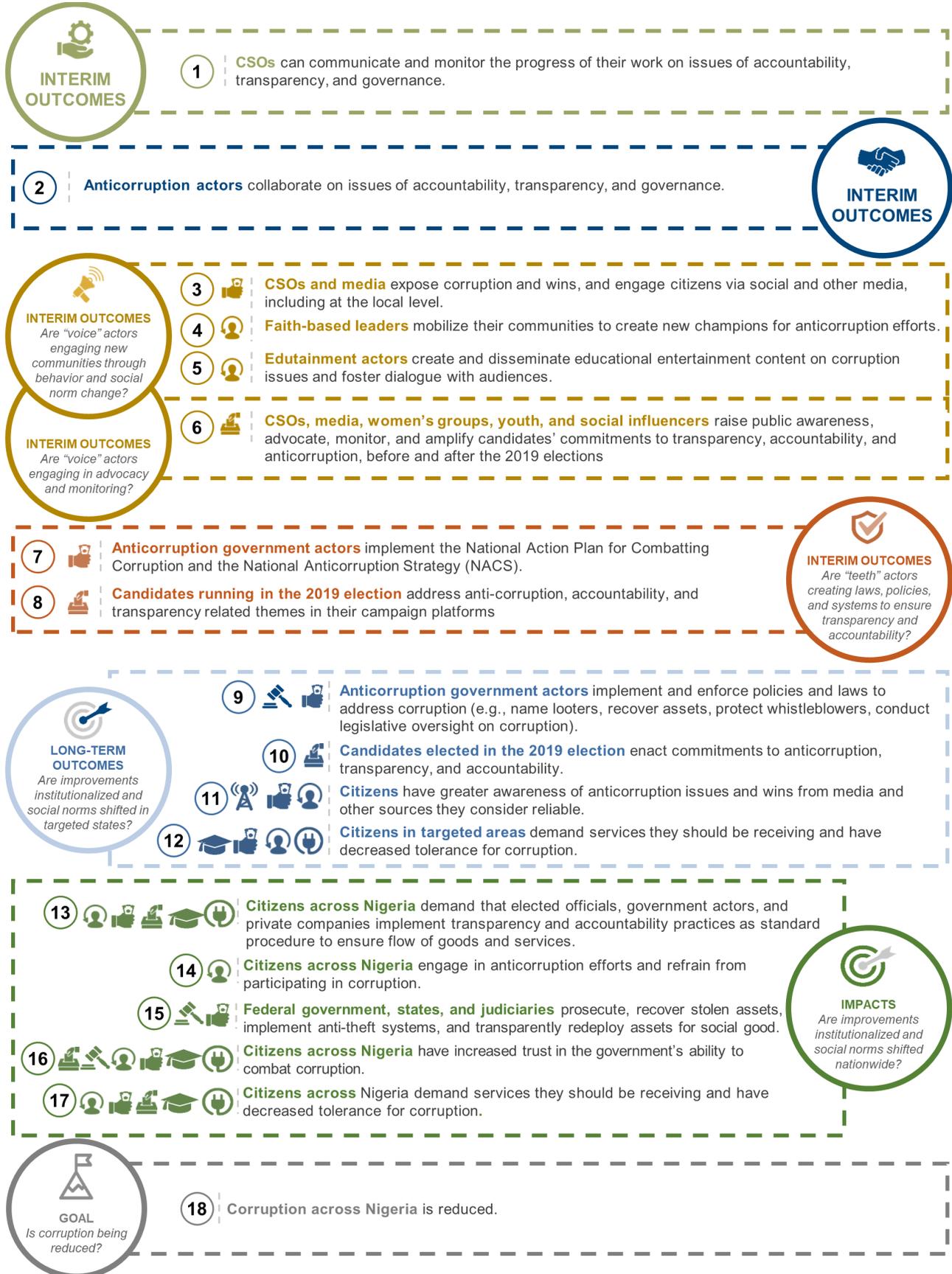


Exhibit 78: Measures for strengthening cross-cutting fields in the fight against corruption



LONG-TERM OUTCOMES
Are improvements institutionalized and social norms shifted in targeted states?

9  **Anticorruption government actors** implement and enforce policies and laws to address corruption (e.g., name looters, recover assets, protect whistleblowers, conduct legislative oversight on corruption).
Measure: Evidence that Nigerian governmental bodies implementing and enforcing policies and laws to address corruption (status: adopted, implemented, enforced)

10  **Candidates elected in the 2019 election** enact commitments to anticorruption, transparency, and accountability.
Measure: Evidence that candidates elected to federal office or state governor in the 2019 election are enacting commitments to anticorruption, transparency, and accountability

11  **Citizens** have greater awareness of anticorruption issues and wins from media and other sources they consider reliable.
Measure: Proportion of citizens who are aware of positive outcomes of anticorruption actions (MJ 9.1)

12  **Citizens in targeted areas** demand services they should be receiving and have decreased tolerance for corruption.
Measure: Proportion of citizens in target areas demanding attention to corruption issues
Measure: Proportion of citizens in target areas indicating they lack tolerance for corruption

13  **Citizens across Nigeria** demand that elected officials, government actors, and private companies implement transparency and accountability practices as standard procedure to ensure flow of goods and services.
Measure: See STRAT 17.1 below

14  **Citizens across Nigeria** engage in anticorruption efforts and refrain from participating in corruption.
Measure: Proportion of citizens indicating they paid a bribe in the previous 12 months
Measure: Evidence of citizens exposing corruption through social media, tip lines, or other means

15  **Federal government, states, and judiciaries** prosecute, recover stolen assets, implement anti-theft systems, and transparently redeploy assets for social good.
Measure: Evidence of prosecution for stolen assets, recovery, anti-theft system implementation, and asset redeployment for social good (social investment)

16  **Citizens across Nigeria** have increased trust in the government's ability to combat corruption.
Measure: Proportion of citizens indicating they trust the government to combat corruption

17  **Citizens across Nigeria** demand services they should be receiving and have decreased tolerance for corruption.
Measure: Proportion of citizens across Nigeria demanding attention to corruption issues
Measure: Proportion of citizens across Nigeria indicating they lack tolerance for corruption

IMPACTS
Are improvements institutionalized and social norms shifted nationwide?

GOAL
Is corruption being reduced?

18  Corruption across Nigeria is reduced.
Measure: Proportion of citizens who feel corruption has decreased in the past 12 months
Measure: Extent of corruption in Nigeria (measured through the existing international indices)

Annex 3: On Nigeria Grants

Exhibit 79: On Nigeria HGSF grantees

Grantee	Approach	Funding (in USD)	Grant approval date
Action Health, Incorporated (2)	Voice Skill Building Collaboration	\$470,000	15-Aug-2017
Actionaid International Foundation Nigeria	Voice Teeth Skill Building	\$1,300,000	6-Dec-2017
Centre for Women's Health and Information	Voice Skill Building Collaboration	\$280,000	3-Aug-2017
Connecting Gender for Development	Voice Skill Building Collaboration	\$420,000	15-Aug-2017
Federation of Muslim Women Associations in Nigeria	Voice Skill Building Collaboration	\$420,000	3-Aug-2017
Girl Child Concerns	Voice Skill Building Collaboration	\$490,000	3-Aug-2017
Imperial College London, Partnership for Child Development (2)	Teeth Collaboration	\$1,200,000	13-Sep-2016
Nigerian Popular Theatre Alliance	Voice Skill Building Collaboration	\$420,000	15-Aug-2017
Women's Consortium of Nigeria	Voice Skill Building Collaboration	\$280,000	15-Aug-2017

Exhibit 80: On Nigeria UBEC grantees

Grantee	Approach	Funding (in USD)	Grant approval date
Centre for Democratic Development Research and Training (CEDDERT)	Voice Skill Building Collaboration	\$250,000	15-Aug-2017
Civil Society Action Coalition on Education for All	Voice Skill Building Collaboration	\$250,000	14-May-2016
Community Life Project	Voice Skill Building Collaboration	\$350,000	15-Aug-2017
Connected Development Initiative	Voice Skill Building Collaboration	\$350,000	13-May-2017
Human Development Initiatives (2)	Voice Skill Building Collaboration	\$600,000	14-May-2016
Legal Awareness for Nigeria Women	Voice Skill Building Collaboration	\$300,000	15-Aug-2017
Pastoral Resolve	Voice Skill Building Collaboration	\$300,000	15-Aug-2017

Grantee	Approach	Funding (in USD)	Grant approval date
Public and Private Development Centre (2)	Skill Building Teeth Voice	\$920,000	14-May-2016
Resource Centre for Human Rights and Civic Education	Voice Skill Building Collaboration	\$300,000	3-Aug-2017
TEP LearNigeria Initiative	Voice Teeth Skill Building Collaboration	\$450,000	3-Aug-2017
Universal Basic Education Commission	Teeth Skill Building Collaboration	\$500,000	31-Jan-2017

Exhibit 81: On Nigeria Electricity grantees

Grantee	Approach	Funding (in USD)	Grant approval date
Association of Nigerian Electricity Distributors (2)	Voice Skill Building Collaboration	\$680,000	14-Dec-2016
Breketete Family (2)	Voice	\$865,000	20-Feb-2016
Consumer Protection Council (CPC)	Teeth Skill Building Voice	\$300,000	20-Feb-2016
Nextier Capital Limited	Skill Building Voice Collaboration	\$400,000	31-Jan-2017
Nigerian Electricity Regulatory Commission	Teeth Skill Building Collaboration	\$600,000	12-Sep-2017
Stakeholder Democracy Network (2)	Voice Skill Building Collaboration	\$750,000	14-May-2016

Exhibit 82: On Nigeria Criminal Justice grantees

Grantee	Approach	Funding (in USD)	Grant approval date
Centre for Democracy & Development (Nigeria)	Skill Building Collaboration	\$49,392.50	15-Jun-2019
Centre for Socio-Legal Studies (3)	Teeth Skill Building Collaboration	\$1,749,392.50	7-Dec-2015
CLEEN Foundation (3)	Teeth Skill Building Collaboration Voice	\$1,350,000	31-Oct-2015
International Federation of Women Lawyers (FIDA)	Teeth Skill Building	\$400,000	13-May-2017
Legal Defense and Assistance Project LEDAP (2)	Skill Building Teeth	\$1,023,000	14-Feb-2016
Nigerian Bar Association	Teeth Skill Building	\$1,800,000	19-Jun-2017
Nigerian Institute of Advanced Legal Studies	Teeth Skill Building Collaboration	\$1,200,000	18-Jun-2017

Grantee	Approach	Funding (in USD)	Grant approval date
	Voice		
Partners West Africa – Nigeria	Teeth Collaboration	\$500,000	13-May-2017
TrustAfrica	Teeth Skill Building Collaboration	\$2,000,000	9-Jun-2015

Exhibit 83: On Nigeria Media and Journalism grantees

Grantee	Approach	Funding (in USD)	Grant approval date
Bayero University, Kano (2)	Skill Building Voice Collaboration	\$1,500,000	12-Dec-2016
British Broadcasting Corporation	Voice Skill Building Collaboration	\$1,000,000	24-Sep-2018
Cable Newspaper Journalism Foundation (2)	Voice Skill Building Collaboration	\$920,000	12-Dec-2016
Daily Trust Foundation (2)	Voice Skill Building Collaboration	\$850,000	12-Dec-2016
Global Investigative Journalism Network	Skill Building Collaboration	\$50,000	23-Jun-2017
International Center for Journalists	Skill Building	\$44,388	1-Nov-2017
International Centre for Investigative Reporting (2)	Voice Skill Building Collaboration	\$367,255	12-Dec-2016
Premium Times Centre for Investigative Journalism (3)	Voice Skill Building Collaboration Teeth	\$2,685,710	12-Dec-2016
Progressive Impact Organization for Community Development	Voice Skill Building Collaboration	\$300,000	29-Jan-2019
Reboot (2)	Skill Building Voice Collaboration	\$700,000	12-Dec-2016
Sahara Reporters	Voice Skill Building Collaboration	\$600,000	12-Dec-2016
Signature Communications Limited	Voice Skill Building Collaboration	\$880,000	24-Sep-2018
Tiger Eye Social Foundation	Voice Skill Building Collaboration	\$700,000	12-Dec-2016
University of the Witwatersrand, Johannesburg, Department of Journalism and Media Studies	Skill Building	\$10,000	6-Aug-2018
Wadata Communication Nig Ltd	Voice Skill Building Collaboration	\$680,000	24-Sep-2018
Wole Soyinka Centre for Investigative Journalism	Voice Skill Building Collaboration	\$300,000	12-Dec-2016

Exhibit 84: On Nigeria Cross-Cutting grantees

Grantee	Approach	Funding (in USD)	Grant approval date
Accountability Lab (2)	Skill Building Collaboration Voice	\$353,700	24-Jul-2018
African Centre for Leadership, Strategy and Development	Voice Collaboration	\$400,000	21-May-2017
African Centre for Media and Information Literacy	Voice Collaboration	\$300,000	13-May-2017
Akin Fadeyi Foundation	Voice Skill Building	\$500,000	1-Nov-2017
Al-Habibiyyah Islamic Society	Voice Skill Building	\$600,000	12-Dec-2017
American University, School of International Service	Voice Teeth	\$499,750	24-May-2018
Arewa Research and Development Project	Voice Collaboration	\$400,000	21-May-2017
Bayero University, Kano	Voice Skill Building	\$1,000,000	12-Dec-2017
Behavioral Insights (US) Inc.	Skill Building	\$134,000	25-Oct-2018
BudgIT	Voice Skill Building Collaboration	\$350,000	14-May-2016
BudgIT Foundation	Voice Skill Building	\$500,000	01-Jul-2019
Center for Information Technology and Development	Voice Collaboration Skill Building	\$1,125,000	12-Jun-2018
Centre for Democracy and Development (Nigeria) (2)	Collaboration Voice Teeth Skill Building	\$3,240,000	18-Jul-2018
Centre for Transparency Advocacy	Voice Collaboration	\$300,000	13-May-2017
Chatham House	Skill Building Voice Teeth	\$740,000	12-Jun-2018
Civil Society Legislative Advocacy Centre	Voice Collaboration	\$600,000	19-Jun-2017
Common Purpose	Skill Building Collaboration	\$62,500	14-May-2016
Community Life Project	Collaboration Skill Building	\$23,100	01-Sep-2019
Equal Access International (2)	Voice Skill Building	\$2,355,000	12-Dec-2017
Fans Connect Online Limited	Voice Skill Building	\$400,000	21-Oct-2017
FUNDAR, Centro de Analisis e Investigacion	Collaboration Skill Building	\$11,262	01-Sep-2019
Griot Studios	Voice Skill Building	\$400,000	1-Nov-2017
Harvard University, John F. Kennedy School of Government	Skill Building Teeth Collaboration Voice	\$377,400	31-Jan-2017
HEDA Resource Centre (2)	Voice Collaboration	\$600,000	21-May-2017
High Definition Film Studio, Limited	Voice	\$700,000	12-Dec-2017

Grantee	Approach	Funding (in USD)	Grant approval date
	Skill Building		
Independent Corrupt Practices and Other Related Offences Commission (ICPC)	Skill Building Teeth Collaboration	\$1,500,000	01-Jul-2019
Integrity	Skill Building Voice	\$400,000	11-Feb-2018
International Research and Exchanges Board	Collaboration	\$49,800	4-Oct-2017
Lux Terra Leadership Foundation	Voice Skill Building	\$800,000	12-Dec-2017
Moving Image Limited	Voice Skill Building	\$450,000	21-Oct-2017
Northwestern University	Collaboration	\$10,000	13-Feb-2017
Open Government Partnership Secretariat	Skill Building Collaboration	\$30,000	9-Jun-2018
Palace of Priests Assembly	Voice Skill Building	\$450,000	31-Oct-2017
Policy and Legal Advocacy Centre	Voice Skill Building Collaboration	\$1,070,000	12-Jun-2018
Proteus Fund Inc.	Voice Skill Building	\$300,000	13-Oct-2018
Public and Private Development Centre (2)	Skill Building	\$23,859	01-May-2019
Resource Centre for Human Rights & Civic Education	Collaboration Skill Building	\$5,300.33	01-Sep-2019
SceneOne Productions, Limited	Voice Skill Building	\$800,000	12-Dec-2017
Shehu Musa Yar'Adua Foundation (2)	Voice Collaboration Skill Building	\$2,004,000	19-Jun-2017
Social Development Integrated Centre	Voice Collaboration	\$300,000	21-May-2017
Socio-Economic Rights and Accountability Project (4)	Voice Collaboration Skill Building	\$1,092,167	14-May-2016
UK Citizens Online Democracy (2)	Skill Building Collaboration	\$26,950	24-Jul-2017
University of Kent	Skill Building Voice	\$50,000	21-Sep-2017
Women's Rights Advancement and Protection Alternative	Voice Skill Building Collaboration	\$1,562,000	21-Sep-2017
Youth Initiative for Advocacy, Growth, and Advancement	Voice Skill Building Collaboration	\$480,000	13-May-2017

Annex 4: On Nigeria Evaluation and Learning Framework (Design and Methods)

Provided under separate cover.

Annex 5: 2019 Data Collection Instruments

Provided under separate cover.

