

LOW-LEVEL PROGRESS, HIGH-LEVEL FRAGILITY: THE SUSTAINABILITY GAP IN ANTI- CORRUPTION REFORM IN KYRGYZSTAN

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ABSTRACT. *Anti-corruption reform in Kyrgyzstan has generated measurable institutional and administrative outputs, yet its accountability function is less durable than formal institutionalization suggests. This article develops the concept of the sustainability gap, defined as the post-adoption erosion of a reform's capacity to constrain power, and applies it to three reform domains: public procurement transparency, digital service delivery, and high-level anti-corruption enforcement. Using a qualitative case study design and a process-tracing-informed analysis, it draws on legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings. The findings reveal differentiated trajectories. The public procurement portal generated open data that investigative journalists used to scrutinize politically connected contracts, but its accountability function weakened after it began to impose political costs. Digital service delivery proved more durable because it reduced routine bureaucratic discretion without directly threatening elite resource allocation. High-level enforcement remained visible but lacked consistent, transparent, and institutionally independent follow-up. The comparison shows that the sustainability gap is shaped by donor and project-cycle dependence, limited domestic ownership, and the narrowing of civic space, which weaken the actors able to convert formal transparency into accountability. The article argues that external governance support should be assessed not only by adoption and technical outputs, but also by whether reforms continue to enable scrutiny and constrain power after political costs emerge.*

KEYWORDS: *anti-corruption, sustainability gap, external governance, accountability, Kyrgyzstan.*

1. INTRODUCTION

Anti-corruption reform has been a recurring priority in Kyrgyzstan's post-Soviet political development and one of the main areas of external governance support. Over the past two decades, international actors, including the European Union, UNDP, OSCE, USAID, the OECD, international financial institutions, and bilateral partners, have supported reforms in transparency, public finance management, digital governance, procurement oversight, civil society monitoring, and rule-of-law institutions (European Commission, 2021; UNDP Kyrgyzstan, 2025; OECD, 2024).

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These efforts have produced visible results: laws have been adopted, strategies drafted, digital platforms built, and monitoring frameworks established.

The aim of this article is to explain why externally supported anti-corruption reforms in Kyrgyzstan display uneven post-adoption durability and under what conditions their accountability functions are sustained or weakened. The issue is not whether anti-corruption reforms exist in Kyrgyzstan, or whether they produce initial results. In several areas, they clearly do. Digital service delivery has reduced some forms of routine bureaucratic discretion. Procurement transparency mechanisms have generated data that civil society actors and investigative journalists have used to scrutinize state contracts. Enforcement bodies continue to pursue high-profile cases. What remains less clear is why some reforms retain their technical functionality while others lose their accountability value over time, and why this erosion is more visible in politically sensitive domains than in low-level administrative reform.

This article approaches this uneven pattern through the concept of a sustainability gap: a post-adoption gap between formal institutionalization and the continued ability of reforms to generate accountability. A reform may continue to operate technically while no longer constraining power. A digital platform may deliver services efficiently without touching high-level corruption. A procurement system may remain formally in place while its legal scope is narrowed. An enforcement apparatus may produce visible arrests while follow-up remains opaque. The key question, therefore, is not simply whether anti-corruption reform has been adopted, but whether it continues to generate accountability after adoption.

The Kyrgyz case shows that reform durability depends not only on external support or formal design, but also on the political sensitivity of the reform domain. In a low-conditionality environment, external actors can help generate reform outputs, but they have limited capacity to protect those reforms once they begin to constrain politically sensitive interests. Durability depends on whether reforms become embedded in domestic institutions and whether civic actors, journalists, and oversight bodies are able to defend their accountability function. Low-level administrative reforms are more likely to endure because they improve service delivery without directly threatening elite resource allocation. By contrast, reforms touching public contracts, state-owned enterprises, high-level enforcement, or politically connected actors become more fragile precisely when they begin to work.

The article contributes to debates on external governance, anti-corruption reform, and Central Asian governance by shifting attention from reform adoption to post-adoption durability. Existing research explains why reforms are difficult to adopt, implement, or enforce; this article asks what happens when reforms do begin to function but later lose part of their accountability value. It defines this process as the sustainability gap: post-adoption accountability loss, analytically distinct from non-adoption, implementation failure, or façade compliance.

Empirically, the article examines three reform domains. Public procurement transparency is the main case because it allows the sustainability gap to be traced across formal adoption, partial institutionalization, measurable accountability outputs,



and subsequent narrowing. Digital service delivery is used as a contrast case, showing how technical progress can be sustained without necessarily constraining high-level corruption. High-level anti-corruption enforcement is treated as a supporting illustration of the limits of accountability in politically sensitive domains, where visible enforcement coexists with concerns about selective application and limited transparency over outcomes.

The analysis draws on legal and policy documents, donor monitoring reports, civil society publications, investigative reporting, and governance indicators. Investigative reporting is treated not as legal evidence, but as a record of documented public accountability claims, particularly where official records and follow-up information are limited. The article proceeds as follows. Section 2 develops the conceptual framework around external governance, anti-corruption reform, and the sustainability gap. Section 3 explains the methodology and source base. Section 4 presents the findings across domestic political context, digital service delivery, public procurement transparency, and high-level enforcement. The final section discusses what the Kyrgyz case suggests about the limits of externally supported anti-corruption reform in politically sensitive domains.

2. LITERATURE REVIEW

2.1. *From Implementation Gap to Sustainability Gap*

This section develops the concept of the sustainability gap. It brings together three bodies of literature: external governance, anti-corruption reform, and Central Asian governance. External governance scholarship explains how international actors support reform adoption and implementation beyond their own borders. Anti-corruption research shows why formal integrity reforms often struggle to transform underlying power relations. Central Asian governance scholarship highlights the importance of informal networks, weak rule-of-law institutions, and authoritarian adaptation in shaping donor-supported reform. Taken together, these debates explain why reforms are difficult to adopt, implement, or enforce. They tell us less, however, about reforms that do begin to function, generate data, reduce discretion, or create public accountability claims, but later lose part of that capacity. This article addresses that problem through the concept of the sustainability gap.

2.2. *External Governance under Weak Conditionality*

The external governance literature has long examined how external actors promote governance, rule of law, transparency, and accountability reforms beyond their own borders. In the EU enlargement literature, conditionality is usually treated as the central mechanism of external influence. Compliance with reform requirements is linked to valued material or political rewards, most importantly the prospect of membership. Where membership incentives are credible and the rewards are substantial, external actors can exercise considerable leverage over domestic institutional change (Schimmelfennig & Sedelmeier, 2004).

Outside enlargement contexts, however, this mechanism operates under weaker conditions. In countries without a membership perspective, external actors lack the

strongest incentive structure through which conditionality works. Governance norms may still be promoted through technical assistance, policy dialogue, monitoring, and project funding, but their effects depend more heavily on domestic political conditions (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012). External governance in such settings can support reform activity and formal adoption, but it is less able to guarantee that reforms will be maintained once they begin to impose political costs.

Kyrgyzstan is a low-conditionality case. It has no EU membership perspective, no accession process, and no strong material incentive structure linking compliance with anti-corruption reform to highly valued benefits (Lavenex & Schimmelfennig, 2009; Council of the European Union, 2019; European External Action Service, 2024; Boonstra, 2015). External governance support relies mainly on technical assistance, capacity-building, policy dialogue, monitoring, and project-based funding rather than hard conditionality (European Commission, 2021; UNDP Kyrgyzstan, 2025; OSCE Programme Office in Bishkek, n.d.; OECD, 2024). This does not make external governance irrelevant. It means that its influence is mediated by domestic institutions, political incentives, and the ability of local actors to sustain reform beyond the moment of adoption.

This distinction matters because formal adoption is not the same as durable institutionalization. Levitsky & Murillo conceptualize institutional strength through enforcement, meaning the degree to which formal rules are complied with in practice, and stability, meaning the extent to which institutions survive changes in power and preferences (Levitsky & Murillo, 2009). In weak institutional environments, externally supported reforms may generate formal institutions without ensuring durable enforcement, especially where impartial governance remains limited (Levitsky & Murillo, 2009; Rothstein, 2011; Mungiu-Pippidi, 2015). Governments may adopt the form of reform to gain legitimacy or satisfy external expectations while later weakening its substance when accountability becomes politically costly. This dynamic is particularly relevant in neopatrimonial and authoritarian governance contexts, where formal institutions often coexist with informal power networks and selective enforcement (Lewis, 2012; Cooley & Heathershaw, 2017). The article therefore focuses not on shallow adoption alone, but on a more specific post-adoption problem: the weakening of reforms that had already begun to produce practical accountability effects.

2.3. Mediated Influence and Reform Ownership

External governance in Kyrgyzstan operates through a dense ecosystem of donors, international organisations, technical experts, NGOs, local partners, and project-based implementation structures (Lavenex & Schimmelfennig, 2009; Börzel & Risse, 2012; Kolstad et al., 2008; Sampson, 2010). For domestic actors, the EU, UNDP, OSCE, OECD, USAID, and other external providers may appear less as separate sources of authority than as parts of a wider reform architecture. Anti-corruption reform is therefore filtered through multiple frameworks, priorities, reporting requirements, and project cycles. This can generate reform activity, but it can also make reform durability dependent on whether externally supported mechanisms acquire domestic political and institutional support beyond the life of a project.

Donor-supported reform often produces visible outputs: strategies, action plans, legal amendments, digital tools, training programs, and monitoring frameworks. These outputs matter, but they do not necessarily secure reform sustainability. Where reform

capacity remains concentrated in donor-funded projects, expert networks, or temporary implementation units, institutional memory and political momentum may weaken once funding ends or project personnel leave (Kolstad et al., 2008; Sampson, 2010; OECD, 2024). The multiplication of external frameworks and reporting demands can also fragment reform ownership, especially when recipient institutions are expected to absorb several overlapping agendas at once.

Ownership is therefore central to reform sustainability. This connects to the aid effectiveness literature's emphasis on country ownership and the limits of donor-driven reform (OECD, 2005; Kolstad, Fritz, and O'Neil, 2008; Booth, 2011). Ownership has both institutional and societal dimensions. Institutional ownership refers to whether a reform becomes embedded in permanent state capacity, supported by resources, expertise, and political commitment beyond a donor project cycle. Societal ownership refers to whether civic actors and the wider public recognize the reform as politically valuable and are able to defend it. Anti-corruption reforms are more likely to sustain their accountability function when supported by domestic reform carriers: investigative journalists, watchdog organizations, civil society groups, independent experts, and reform-oriented officials. Where these actors are weak, dependent on external funding, or exposed to political pressure, accountability mechanisms remain vulnerable to neglect, hollowing, repurposing, or reversal.

Public demand matters because transparency mechanisms rarely defend themselves. Anti-corruption scholarship has shown that corruption is not only a problem of formal institutional design, but also of collective action, social expectations, and the persistence of particularistic access to public resources (Rothstein, 2011; Mungiu-Pippidi, 2015; Persson et al., 2012). Citizens may oppose corruption in general while still lacking the organizational capacity, legal protection, or technical information needed to sustain specific accountability claims. Demand can therefore remain latent rather than mobilized. Bauhr and Grimes (2014) show that transparency does not automatically generate public accountability demand. In high-corruption contexts, exposure to corruption may produce resignation rather than indignation, especially where citizens perceive sanctioning mechanisms as weak or ineffective. Under such conditions, reform reversal can remain politically low-cost because there is no protected constituency capable of defending the reform as a public accountability commitment.

This is central to the Kyrgyz case. Societal demand for accountability appears to exist at a broad political level, but it does not always translate into sustained, technically informed pressure over specific transparency mechanisms such as procurement, budgets, or implementation monitoring. At the same time, shrinking civic space, pressure on investigative media, and weak institutional safeguards limit the actors who can translate technical transparency into public accountability (Freedom House, 2026; V-Dem Institute, 2025; Human Rights Watch, 2025). The sustainability of anti-corruption reform therefore depends not only on whether information is disclosed, but also on whether there are actors able to use that information safely and effectively.

2.4. Defining the Sustainability Gap

The implementation gap is well established in public policy literature (Pressman & Wildavsky, 1973; Hill & Hupe, 2002). It refers to the distance between formal adoption and meaningful implementation: a reform may be promised or legally adopted but remain ineffective in practice because of limited resources, weak political commitment,

coordination, or insufficient institutional capacity. The sustainability gap describes a related but analytically distinct problem.

A sustainability gap occurs when a reform moves beyond formal adoption, begins to generate accountability outputs, and then loses part of that function over time. The concept therefore excludes non-adoption, purely symbolic adoption, and reforms that never produced meaningful accountability effects. It applies to reforms that once produced data, enabled monitoring, reduced discretion, or created channels of public scrutiny, but subsequently lost part of their accountability capacity.

The empirical focus is the accountability function of reform. Anti-corruption mechanisms should be assessed not only by whether they formally exist, but also by whether they enable public scrutiny, constrain discretion, expose abuse, support equal enforcement, or allow civic and institutional actors to monitor the use of public power (Schedler, 1999; Bovens, 2007). The empirical analysis therefore traces a sequence from formal adoption and partial institutionalization to the weakening, narrowing, hollowing out, repurposing, or loss of a reform's accountability function.

This loss may take several forms. A transparency mechanism may be legally narrowed so that politically sensitive spending is removed from public scrutiny. An enforcement body may remain active but apply anti-corruption tools unevenly. A digital platform may continue to deliver services while its oversight structure becomes more centralized and less independently monitored. In each case, the reform does not necessarily disappear. It may remain formally or technically present while losing its capacity to constrain power (Levitsky & Murillo, 2009; Mungiu-Pippidi, 2015).

The distinction is especially important for reforms that continue to work technically but no longer sustain an accountability function. Digitalization is a useful contrast case. E-government platforms may reduce face-to-face bureaucratic contact and limit opportunities for petty corruption, which represents real administrative progress (Andersen, 2009; Elbahnasawy, 2014). Yet technical functionality should not be conflated with accountability sustainability. A platform may improve service delivery without exposing elite networks, constraining high-level resource allocation, or empowering independent oversight. The empirical section returns to this distinction by comparing digital service delivery with procurement transparency and high-level enforcement.

The claim is not that external governance fails uniformly. External support can generate real reform outputs, especially in technical and administrative domains (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012). The sustainability gap occurs when those outputs survive formally or technically while losing their capacity to constrain power.

3. METHODOLOGY

This article examines the sustainability of anti-corruption reform in Kyrgyzstan through a qualitative case study design. The approach is well suited to the subject matter: the sustainability gap — defined here as the weakening of a reform's accountability function after formal adoption — is not a discrete measurable outcome but an unfolding process shaped by political, institutional, and civic conditions. Case study research allows for the kind of context-sensitive analysis this requires, bringing together diverse forms

of evidence, including legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings (Yin, 2017; George & Bennett, 2005).

Kyrgyzstan is a suitable case for this article because anti-corruption reform there has been shaped by sustained donor support, while different reform areas have followed visibly different trajectories. Public procurement transparency, digital service delivery, and high-level enforcement have all been part of the reform agenda, but they do not carry the same political weight. Some reforms mainly improve administrative efficiency, while others touch more directly on elite discretion and the allocation of public resources. The post-2020 context of executive recentralization and shrinking civic space makes this variation especially important, as it allows the article to examine whether adopted reforms can continue to perform an accountability function once they begin to generate political costs.

The analysis draws on three principal types of evidence. Legal and policy documents form the first layer, used to trace how Kyrgyzstan's anti-corruption framework has evolved over time. These include the 2015 Law on Public Procurement, the 2021 Constitution of the Kyrgyz Republic, and secondary legislation on procurement by state-owned enterprises. Reading these documents together makes it possible to identify how reforms were formally designed, where transparency obligations changed, and how institutional rules were narrowed or reconfigured.

Donor program documents, monitoring reports, and governance datasets constitute the second layer, situating these reforms within the broader external support architecture. Reports and materials from the European Commission, UNDP, OECD, and the World Bank are used to assess what kinds of reform outputs external actors supported or monitored. Governance indicators from Freedom House, V-Dem, the Bertelsmann Transformation Index, and World Bank datasets provide wider context on civic space, rule of law, voice and accountability, and public sector governance.

Civil society publications and investigative reporting form the third layer, used to examine how transparency mechanisms operated in practice. Reporting from Temirov Live, Kloop Media, Eurasianet, and OCCRP is not treated as legal evidence. Instead, it serves as a record of documented public accountability claims, particularly in areas where official records or follow-up information are limited. Aggregate survey findings publicly presented by Mukanova (2026) at Kyrgyzstan-Türkiye Manas University, drawing on responses from 5,471 civil servants across 20 ministries and agencies, are also used as supplementary evidence from within state institutions.

During the author's research secondment at the OSCE Academy in Bishkek between March and June 2026, a small number of non-attributable background consultations were held with academics and policy specialists familiar with governance and anti-corruption reform in Kyrgyzstan. The consultees were selected purposively on the basis of their academic or professional expertise in the reform areas examined. The consultations were documented only for contextual reference and were used solely to inform the reading of documentary and secondary sources. They were not coded or systematically analyzed as

an interview dataset, no statements are quoted or attributed, and they were not assigned independent evidentiary weight in the analysis.

The three principal bodies of evidence are read together through a process-tracing-informed approach, tracing how reforms moved from formal adoption to partial institutionalization and then either retained or lost their accountability function (George & Bennett, 2005; Bennett & Checkel, 2015). The analysis focuses on three reform domains: public procurement transparency, digital service delivery, and high-level anti-corruption enforcement. These domains are not intended to constitute a representative sample; they were selected because they vary in political sensitivity, making it possible to observe the sustainability gap under different conditions. Public procurement serves as the main case, given that its trajectory can be traced from adoption and operational use through to subsequent legal narrowing. Digital service delivery functions as a contrast case, illustrating how technical progress may be sustained without necessarily producing upward accountability. High-level enforcement serves as a supporting illustration of the gap between visible anti-corruption action and sustained institutional accountability.

Table 1 uses qualitative comparative categories rather than numerical scores. Formal adoption and technical implementation are assessed according to whether a reform was legally established and operational in practice; accountability output according to whether it reduced discretion or enabled monitoring and public scrutiny; political sensitivity according to the extent to which it affected elite discretion or the allocation of public resources; and sustainability outcome according to whether these accountability functions were retained, narrowed, or weakened after adoption. The labels “high”, “low–medium”, and “indeterminate” summarize the documentary and reporting evidence discussed for each domain and are not intended as standardized quantitative measures.

Several limitations bear mentioning. The study relies principally on legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings, which means it does not fully capture how ordinary citizens understand, value, or mobilize around specific accountability mechanisms — a question that would require a different research design based on citizen-level evidence. Investigative reporting is used with care, but it has not been independently verified by the author and therefore carries evidentiary limits. The findings are accordingly best read as analytically rather than statistically generalizable: the sustainability gap reflects a pattern observable in Kyrgyzstan and potentially relevant to similar reform contexts, not a claim that can be extended from a single case to a wider population (Yin, 2017).

4. FINDINGS

The findings are organized around the main areas in which anti-corruption reforms have unfolded, rather than as a step-by-step chronology. Each subsection asks whether reforms moved beyond formal adoption or technical implementation and became durable accountability mechanisms, or whether their accountability function weakened over time. The argument is not that anti-corruption reform in Kyrgyzstan has simply failed. Rather, the findings show a more uneven pattern: reforms are more likely to

endure where they improve routine service delivery but become more fragile when they touch politically sensitive areas of state power, public resources, and elite-linked accountability.

4.1 Domestic Political Context: Recentralization and Shrinking Accountability Space

The sustainability of anti-corruption reforms in Kyrgyzstan needs to be read against the country's post-2020 political context. Since the political transition of 2020–2021, executive authority has become more centralized, while parliamentary and judicial checks have weakened and pressure on independent media and civic actors has increased (OSCE Office for Democratic Institutions and Human Rights and Venice Commission, 2021; Freedom House, 2024; Human Rights Watch, 2025; Bertelsmann Stiftung, 2026). This matters because transparency mechanisms do not generate accountability on their own. For disclosed information to become public scrutiny, sanction, or policy correction, there must also be institutions, journalists, civil society organizations, and legal safeguards able to act on that information (Fox, 2007; Fox, 2015; Bauhr & Grimes, 2014).

The changes introduced after 2020 made this problem more visible. The 2021 constitutional reforms strengthened presidential authority, reduced the number of members of parliament from 120 to 90, and raised concerns about the autonomy of parliament, courts, and enforcement institutions (OSCE Office for Democratic Institutions and Human Rights and Venice Commission, 2021; Constitution of the Kyrgyz Republic, 2021; United Nations Kyrgyzstan, 2023). At the same time, the space for independent scrutiny narrowed. Investigative media and civic actors faced growing legal and political pressure, while the 2024 foreign representatives law created new risks for foreign-funded civil society organizations (Human Rights Watch, 2025; ICNL, 2024; Reporters Without Borders, 2026). This matters because anti-corruption transparency depends not only on legal or digital mechanisms, but also on the actors able to use them.

This political setting made reform sustainability uneven. Low-level administrative reforms, especially digital services that reduce routine contact between citizens and officials, could continue because they improved service delivery without directly challenging politically sensitive networks. Reforms touching public contracting, state-owned enterprises, elite-linked transactions, or high-level enforcement were more exposed. In these areas, transparency was not just a technical instrument; it could also become a constraint on discretionary power (Bovens, 2007; Schedler, 1999; Fox, 2015).

This broader accountability environment helps explain the pattern traced in the following subsections. Kyrgyzstan's anti-corruption reforms show genuine progress where technical modernization reduces petty bureaucratic discretion. Yet their accountability function becomes more fragile when reforms depend on civic oversight, independent investigation, judicial autonomy, or sustained political tolerance (Freedom House, 2024; Human Rights Watch, 2025; Bertelsmann Stiftung, 2026). The following subsections examine this divergence through digital service delivery, public procurement transparency, and high-level anti-corruption enforcement.

External support remains important in this setting, but its effects are mediated by domestic political and institutional conditions (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012). Donor programs can help create legal frameworks, digital tools, monitoring systems, and technical capacity, yet they cannot by themselves ensure that reforms retain their accountability function once they begin to generate political costs

(Kolstad, Fritz, and O’Neil, 2008; Booth, 2011; OECD, 2024). Where reform capacity is tied to project cycles, external expertise, or temporary implementation structures, sustainability depends on whether domestic institutions and civic actors are able to carry the reform beyond the moment of adoption. The continued role of the European Commission, UNDP, OSCE, and OECD in policy support, monitoring, and technical assistance shows that important elements of reform capacity remained organized through externally supported programs (European Commission, 2021; UNDP Kyrgyzstan, 2025; OSCE Programme Office in Bishkek, n.d.; OECD, 2024). At the same time, pressure on investigative media and new legal risks for foreign-funded civil society organizations weakened the domestic actors capable of defending specific accountability mechanisms (Committee to Protect Journalists, 2024; Human Rights Watch, 2025; ICNL, 2024). Together, these developments provide the empirical basis for the mechanisms of donor and project-cycle dependence, limited domestic ownership, and narrowing civic space.

4.2. Low-Level Administrative Anti-Corruption: Technical Progress without Upward Accountability

The most visible progress in Kyrgyzstan’s anti-corruption reform trajectory has taken place at the level of everyday administrative services. Digital service delivery, e-government platforms, and electronic public services can reduce opportunities for petty corruption by limiting direct interaction between citizens and officials (Andersen, 2009; Elbahnasawy, 2014). When documents, certificates, payments, and applications move online, citizens have fewer reasons to negotiate informally with bureaucrats, and officials have fewer opportunities to exercise routine discretion.

Tunduk is the clearest example of this kind of progress. Designed as an interagency electronic interaction system, it allows government bodies, local authorities, and commercial organizations to exchange data securely, while reducing the need for citizens to collect and submit paper certificates manually (Tunduk, n.d.). In practice, it has become a core part of Kyrgyzstan’s digital public infrastructure, connecting government databases and giving citizens and businesses access to state services through a unified authenticated interface (Tunduk, n.d.; LaForge & Kapur, 2026). By early 2025, the Tunduk mobile application included 171 government services and had processed 16 million requests during 2024; official figures also reported substantial savings in citizens’ time and administrative costs (Trend.az, 2025). By August 2025, the combined portal and application offered 182 digital government services, including services for small and medium-sized enterprises (Kabar, 2025). In 2025, state and local government bodies were also required to stop requesting paper certificates where the relevant information was already available through Tunduk (Akchabar, 2025; 24.kg, 2025).

These developments matter because they reduce the everyday spaces in which petty corruption can occur. They do not, however, prove a direct causal reduction in corruption, nor do they show that digitalization limits higher-level discretion over public resources. Tunduk’s main significance therefore lies in service delivery and administrative simplification. It may make routine interactions with the state faster, less discretionary, and less dependent on personal contact, while leaving wider accountability relations largely unchanged.

The 2026 transfer of state management powers over Tunduk OJSC from the digital development authorities to the Presidential Administration/Department of Presidential Affairs reflects this ambiguity (24.kg, 2026b). On one hand, the transfer could improve coordination and implementation capacity. On the other hand, it could make the platform more dependent on executive control. The key question is therefore not simply whether Tunduk continues to function, but whether its new institutional position strengthens or weakens its accountability role over time. For this reason, Tunduk captures the broader pattern examined in this article: a reform may remain technically useful without becoming a durable constraint on power.

4.3. Public Procurement and Contracting Transparency: Formal Mechanisms and Accountability Loss

Public procurement is the strongest empirical example of the sustainability gap in Kyrgyzstan's anti-corruption reforms. Unlike low-level administrative digitalization, procurement transparency concerns the allocation of public money, state contracts, and relationships between public authorities and politically connected actors. Its trajectory shows how a reform can be formally adopted, partially institutionalized, and still lose part of its accountability function over time.

Kyrgyzstan adopted a new Law on Public Procurement in 2015, and public procurement was then moved onto the official electronic portal zakupki.gov.kg (Kyrgyz Republic, 2015; zakupki.gov.kg, n.d.). This framework was subsequently replaced by the Law of the Kyrgyz Republic No. 27 "On Public Procurement," adopted on April 14, 2022 (Kyrgyz Republic, 2022). The portal remained the main electronic platform for public procurement, providing information on procurement procedures from announcement to contract award and enabling both procuring entities and suppliers to participate electronically (Baizakova, 2020). In design, this represented a significant transparency reform: procurement information, including requirements and evaluation criteria, was made publicly accessible. The reform also received sustained donor support from the World Bank and the Asian Development Bank, and later from USAID, making it one of the clearest examples of externally supported transparency infrastructure in Kyrgyzstan (World Bank, 2016; Transparent Public Procurement Rating, n.d.; Uselman, 2024).

The portal was not only a formal requirement. It generated usable data, structured tender procedures, and created openings for external scrutiny (Baizakova, 2020). Available evidence suggests that competitive and open procurement procedures also produced measurable savings. According to the Public Procurement and Logistics Observatory, transparent procurement procedures among state and municipal enterprises and state-owned joint-stock companies saved 3.0 billion soms in 2021 (Public Procurement and Logistics Observatory, 2022). More importantly for this article, the portal gave civic actors a tool with which to monitor politically sensitive contracts. In July 2021, investigative journalists associated with Temirov Live used procurement data to show that Uuna, a state-controlled entity responsible for driving licenses and vehicle plates, had awarded a lucrative contract to a company affiliated with the daughter of a close acquaintance of President Japarov (Eurasianet, 2022).

This accountability function later weakened. Under President Japarov, changes to the public procurement framework reduced transparency in politically sensitive procurement domains. State-owned enterprises and joint-stock companies were exempted from the public procurement law, a major change given their weight in public

spending. The UN's 2022 Common Country Analysis estimated that procurement by companies with more than 50 percent state ownership amounted to 25.3 billion soms per year, or 59.7 percent of all public procurement, and warned that their exclusion from open procurement reduced the ability of watchdog and anti-corruption organizations to trace potentially fraudulent schemes (United Nations Kyrgyzstan, 2023). As a result, procurement by state-controlled companies no longer had to follow the same tender and publication requirements. Contemporary reporting similarly warned that the changes would move a substantial share of public spending into less visible channels, making it harder for citizens to see how funds were allocated (Eurasianet, 2022; Public Procurement and Logistics Observatory, 2022; Reznikova & Irgebaeva, 2022). Later changes to procurement formats for state-owned enterprises in 2026, including expanded exemptions and revised thresholds for simplified procurement, reinforced concerns that politically sensitive procurement would remain subject to weaker transparency requirements than ordinary public procurement (24.kg, 2026a).

This trajectory captures the sustainability gap. The issue was not the absence of reform. Nor was it that the procurement portal failed technically. The portal existed, produced data, and was used by journalists and civic actors. The problem was that its accountability value became vulnerable once it began to expose politically sensitive relationships.

Survey evidence from within state institutions points to the same tension. In a survey of 5,471 civil servants from 20 ministries and agencies presented at Kyrgyzstan-Türkiye Manas University in May 2026, public procurement was identified as one of the main corruption-risk areas, with 19 per cent of respondents naming it as a risk domain. At the same time, a substantial share assessed the procurement system as transparent or moderately transparent (Mukanova, 2026). This coexistence of perceived corruption risk and formal transparency is important. It suggests that a system may be seen as procedurally transparent while still failing to constrain politically sensitive contracting in practice.

The weakening of civic accountability actors further reduced the political cost of rollback. Temirov Live had shown that procurement data could be turned into public accountability claims (Eurasianet, 2022). Yet its suppression removed one of the few actors able to use that data effectively and publicly (Committee to Protect Journalists, 2024; Human Rights Watch, 2025). When journalists and watchdogs are prevented from translating transparency into scrutiny, the formal existence of data becomes less politically consequential. In this sense, both sides of the accountability chain weakened at the same time: transparency mechanisms were narrowed, and the actors capable of using them came under pressure.

4.4. High-Level Anti-Corruption Enforcement: Visibility without Equal Accountability

In politically sensitive areas, anti-corruption action can remain visible while still falling short of sustained, equal, and transparent accountability. At the high political level, Kyrgyzstan continues to see arrests, investigations, and public announcements that signal state action against corruption. Such actions may respond to public frustration and create the appearance of strong enforcement. The more difficult question is whether enforcement is systematic, transparent, and equally applied. Without independent judicial oversight, transparent follow-up, and public access to outcomes, visible enforcement is difficult to assess as institutional accountability. Freedom House's

reporting on customs-related corruption cases and the 2022 Health Ministry case both reflect this ambiguity: state action took place, but questions remained about whether the process was transparent, consistent, and institutionally independent (Freedom House, 2024; OCCRP, 2022).

Secondary reporting and the broader documentary record raise a similar concern. High-level anti-corruption enforcement appears particularly vulnerable to selective use, especially where politically exposed actors may lose protection while loyal or well-connected figures remain less exposed. Public approval of high-profile arrests may reflect genuine anger toward corruption. Yet this demand is only partially satisfied if citizens cannot monitor recovered assets, judicial outcomes, or the equal application of law across political networks.

Survey data from within state institutions reinforces this point. In the same survey of 5,471 civil servants across 20 ministries and agencies, only 25.3 per cent of respondents who had encountered corruption-related facts believed they were fully protected. Significant shares either reported no protection for whistleblowers or lacked information about available protection mechanisms (Mukanova, 2026). Because these figures come from within the state apparatus, they are especially relevant. They suggest that internal accountability mechanisms remain weak, even as anti-corruption enforcement remains publicly visible.

High-level enforcement may therefore be active and visible without becoming a stable accountability mechanism. In a context of weak courts, limited parliamentary oversight, pressure on investigative media, and legal risks for civic actors, citizens have fewer channels through which to judge whether enforcement is systematic or selective (Freedom House, 2026; Human Rights Watch, 2025; Bertelsmann Stiftung, 2026). Visibility can generate legitimacy, but it does not necessarily complete the accountability chain.

The three reform areas therefore point to the same underlying pattern. Digital service delivery has continued to expand because it improves administrative efficiency and reduces routine discretion without directly challenging high-level political interests. Public procurement transparency became more fragile once it enabled scrutiny of politically sensitive contracts. High-level enforcement remains visible, but its accountability value depends on transparent follow-up, equal application, and institutional independence. The sustainability gap therefore lies not in the absence of reform, but in the weakening of accountability once reforms begin to constrain politically sensitive power relations.

Table 1. Reform Sustainability across Three Domains

Reform domain	Formal adoption/ technical implementation	Accountability output	Political sensitivity	Sustainability outcome
Digital service delivery (Tunduk)	High	Low–medium: reduces routine discretion and face-to-face contact	Low–medium	Technically sustained, but limited upward accountability

Public procurement transparency (zakupki.gov.kg)	High	High: enables scrutiny of contracts and suppliers	High	Weakened through legal narrowing and pressure on civic users
High-level anti-corruption enforcement	High	Indeterminate: visible enforcement, but insufficient transparency to assess accountability outcomes	High	Visible but uneven; weak sustained accountability

Source: Author's own compilation based on policy documents, governance indicators, and investigative reporting

As Table 1 summarizes, all three domains display high levels of formal adoption or technical implementation but differ in their accountability outputs, political sensitivity, and sustainability outcomes. Taken together, the findings show that reforms are more likely to endure where they improve routine service delivery, but become more fragile when they touch politically sensitive areas of state power, public resources, and elite-linked accountability.

5. DISCUSSION

5.1. The Sustainability Gap as Post-Adoption Accountability Loss

The findings show that anti-corruption reform in Kyrgyzstan cannot be understood only through adoption, implementation, or formal compliance. Some reforms were adopted, partially operationalized, and even used for accountability purposes before their public accountability function weakened. This is the dynamic captured by the sustainability gap: reforms may remain visible as laws, platforms, strategies, or enforcement actions, while losing their ability to constrain discretion, enable public scrutiny, or support equal accountability. The findings suggest that this is not simply a failure of adoption, but a failure to protect accountability functions once reforms become politically consequential.

5.2. How the Mechanisms Work Together

As Table 2 summarizes, the sustainability gap is produced by several mechanisms working in combination, rather than by any single institutional failure. Donor and project-cycle dependency weakens domestic ownership, while limited public demand reduces the political cost of reversal. At the same time, weakened reform carriers, including investigative journalists, NGOs, and watchdog organizations, reduce the capacity to defend accountability functions when they are needed most (Kolstad et al., 2008; Sampson, 2010; Bauhr & Grimes, 2014; Mungiu-Pippidi, 2015; Fox, 2015). Under these conditions, accountability loss can be framed as administrative rationalization or legal simplification rather than as democratic backsliding.

Table 2. Mechanisms Producing the Sustainability Gap

Mechanism	How it works	Evidence in Kyrgyzstan
Donor/project-cycle dependence	Reform capacity remains partly tied to external funding, expertise, monitoring frameworks, and temporary implementation structures	External support helped generate legal, digital, and monitoring outputs, but could not by itself secure the long-term accountability function of reforms
Limited domestic ownership	Reforms lack sufficiently embedded institutional and societal defenders once they become politically costly	Weak reform carriers, limited public mobilization around specific transparency mechanisms, and reliance on civic actors exposed to political pressure
Narrowing civic space	Actors who translate transparency data into public accountability face legal, political, or institutional pressure	Pressure on Temirov Live and Kloop Media, legal risks for NGOs, and the 2024 foreign representatives law

Source: author's own compilation

This interaction is clearest in the procurement case. The portal existed, functioned, and was used by investigative journalists to expose politically sensitive contracting relationships. The problem was not that the reform was merely symbolic, nor that the technical design failed from the outset. Rather, the social and institutional conditions needed to sustain procurement transparency were too fragile once the mechanism began to generate political costs. The sustainability gap emerges precisely here: not because the reform never worked, but because the conditions required to keep it working were never adequately secured.

5.3. Why Accountability Travels Downward More Easily Than Upward

In the Kyrgyz case, accountability tends to travel downward more easily than upward. Low-level technical reforms can reduce routine bureaucratic discretion without directly threatening patronage networks. High-level accountability reforms operate differently. Procurement transparency, independent enforcement, and scrutiny of politically connected actors touch the mechanisms through which power and public resources are distributed. For this reason, they are more politically sensitive and more exposed to narrowing, selective implementation, or reversal.

A second reason is the absence of protected civic actors able to turn transparency into public pressure. High-level transparency mechanisms are rarely self-executing. Procurement data, asset declarations, audit findings, and enforcement records require actors who can interpret, publicize, and defend them (Fox, 2007; Fox, 2015). When investigative journalists, NGOs, and watchdog organizations are weakened, the social basis for upward accountability is weakened as well.

A related framing problem is visible within state institutions themselves. Survey data publicly presented at Kyrgyzstan-Türkiye Manas University found that 65.7 per cent of civil servant respondents identified low wages as the primary driver of corruption (Mukanova, 2026). Wage levels are a real structural concern, and this perception among

civil servants is not simply mistaken. But the framing matters analytically: when corruption is understood mainly as individual material deprivation rather than as political protection or patronage, the problem becomes technical rather than political. Accountability reform framed in these terms, as a matter of adequate pay and better procedures, is less likely to generate pressure for the kind of high-level scrutiny that would expose powerful actors. This framing tendency maps onto a wider pattern in external governance, where anti-corruption is routinely translated into administrative fixes, making the erosion of high-level accountability mechanisms harder to see and easier to accept.

5.4. Implications for External Governance and Central Asian Reform Politics

Adoption is rarely where external governance fails in Kyrgyzstan. The limits become visible later, when reforms begin to expose public contracts, state-owned enterprise spending, and the networks around politically connected actors. Platforms were built, data was published, and journalists used that data to reveal uncomfortable findings. What eroded was not the technical infrastructure itself, but the conditions under which it could continue to function as accountability. External support produced real outputs, but it could not secure the civic and institutional infrastructure needed to defend those outputs when reversal became politically convenient (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012).

Technicalisation reinforces this dynamic. External governance programmes often translate anti-corruption into measurable activities: digital systems, compliance procedures, reporting indicators, capacity-building events, and administrative reforms (Kolstad et al., 2008; Sampson, 2010). This makes reform easier to adopt, but also easier to hollow out. If a reform is treated mainly as a project output rather than as a public accountability commitment, its weakening is unlikely to generate significant political resistance.

External governance frameworks should therefore assess not only whether a law was passed or a platform was built, but whether the actors capable of using those tools are protected. Investigative media, civic monitors, and watchdog organizations connect formal transparency infrastructure to actual public scrutiny; they are not peripheral to anti-corruption programming (Fox, 2015). The demand-side dimension extends beyond organized civil society as well. Governance reforms that remain concentrated within ministries, parliament, and the presidential administration — without wider public understanding, support, and participation — become easier to reverse once donor projects end. When civic space closes and donors focus primarily on technical outputs, reforms lose their social defenders and accountability is reduced to administration.

The argument also carries broader implications for the study of reform politics in Central Asia. Similar reform language — digitalization, transparency, public administration modernization, and anti-corruption commitment — circulates widely across the region, yet the same formal commitments can produce quite different sustainability outcomes depending on whether they are embedded in domestic institutions and defended by civic actors (Lewis, 2012; Cooley and Heathershaw, 2017). The sustainability gap concept may be useful comparatively in this respect, not to assert uniform failure, but to ask why some reforms retain their accountability function while others become formally intact but functionally depleted structures.

The sustainability gap should therefore not be read as a uniquely Kyrgyz problem. It points instead to a broader vulnerability of external governance in low-conditionality settings where civic space is narrowing and accountability carriers are politically exposed. The

question for comparative research is not whether reforms were adopted, but whether, and under what conditions, they continue to constrain power.

6. CONCLUSIONS AND LIMITATIONS

The core issue in externally supported anti-corruption reform is not only whether reforms are adopted, but whether they continue to constrain discretion and enable scrutiny after adoption. The Kyrgyz case shows that this durability varies across reform domains. Public procurement transparency moved well beyond formal adoption: the portal generated data, structured tender procedures, and was used by investigative journalists to expose politically sensitive contracting relationships. Yet its accountability function weakened once it began to disturb interests that the reform had not initially threatened. Digital service delivery, by contrast, has proven more durable because it improves administrative efficiency without directly exposing elite resource allocation or requiring sustained civic oversight. High-level enforcement reinforces this pattern: visibility should not be confused with accountability where follow-up, judicial independence, and equal application remain uncertain.

The article shifts attention from why reforms are adopted to the conditions under which adopted reforms continue to constrain power. Existing frameworks examine adoption and implementation, but they do not fully account for reforms that move beyond formal compliance and then lose their accountability function. The sustainability gap is therefore distinct from the implementation gap (Pressman & Wildavsky, 1973). It describes erosion after partial institutionalization, not failure before implementation. The conditions that explain adoption, including donor pressure, political windows, and technical assistance, are not necessarily the conditions that sustain accountability once reforms begin to affect entrenched interests.

The Kyrgyz case points to three mechanisms behind this gap. Donor and project-cycle dependency can concentrate reform capacity in temporary structures, leaving reforms vulnerable when funding or political attention shifts. Weak domestic ownership, both institutional and societal, means that reforms lack the embedded resources and protected constituencies needed to survive when they become politically inconvenient. The narrowing of civic space removes the actors, especially civic monitors and investigative media, who translate formal transparency into public accountability claims. When these mechanisms operate together, accountability loss can be presented as administrative adjustment rather than democratic backsliding, and reversal carries limited political cost.

Reform success should therefore not be measured through adoption rates or technical functionality alone. Procurement portals, legal frameworks, and digital platforms should also be assessed by whether they continue to enable public scrutiny and constrain discretion over time. Civic actors and investigative media are part of the sustainability infrastructure of anti-corruption reform, not peripheral to it. In low-conditionality settings, donor support focused on technical outputs while civic space contracts can produce reforms that remain formally present but become functionally hollow.

The study also has limitations. It relies mainly on legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings. The non-attributable background consultations were not treated as an interview dataset and therefore do not provide systematic

evidence of practitioner or citizen perspectives. As a result, the study does not fully capture how ordinary citizens understand, value, or mobilize around specific accountability mechanisms. Citizen-level evidence, including public opinion research, formal qualitative interviews, or ethnographic work, would be needed to examine how public demand for accountability is formed, constrained, or mobilized.

Future research could examine whether similar sustainability gaps appear elsewhere in Central Asia and whether the low-level/high-level distinction holds across different political configurations. Public procurement would be a particularly productive comparative focus because it combines technical reform, public resource allocation, and political sensitivity in ways that make accountability loss observable. Further work should also examine civic coalitions, professional communities, and investigative media networks as carriers of reform sustainability.

Externally supported anti-corruption reform can produce real but uneven outcomes. The sustainability gap reframes the central question: not whether reforms are adopted, but whether the conditions under which they can continue to constrain power are themselves protected. In low-conditionality settings where civic space is contracting, that question points beyond formal institutions to the social and political conditions under which accountability can survive contact with power.

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CONFLICT OF INTEREST

The author declares no conflict of interest.

AUTHORS' CONTRIBUTIONS

ABÖ: conceptualization, methodology, investigation, formal analysis, writing – original draft, writing – review and editing.

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