

Moldova: Special Accountability Report Action Plan 2014

I. Overview

The Open Government Partnership (OGP) is a voluntary, multistakeholder international initiative that aims to secure concrete commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. The Independent Reporting Mechanism (IRM) carries out a biannual review of the activities of each OGP participating country.

The Special Accountability Report

The Government of Moldova joined the OGP in April 2012, after adopting Decision No. 195 on the Implementation of the Open Government Action Plan.

The first action plan was developed for two years (2012-2013). It contained 25 commitments and 47 milestones, out of which 16 milestones were fully completed. In 2013, the government took a different approach for developing the second action plan, which contains four commitments. The second action plan, part of the broader Governance E-Transformation Action Plan for 2014,¹ lays out actions related to implementing technological solutions for improving governance. All open government commitments for 2014 were integrated within the e-government action plan. Therefore, rather than the standard two-year action plan, Moldova's second OGP Action Plan was designed to cover one year. The effective period of implementation for the action plan was 1 January 2014 to 31 December 2014. This report covers the development phase from July 2013 to September 2013, and the year of the 2014 action plan implementation from 1 January 2014 through 31 December 2014.

Due to the shortened time frame covered by this report, and after consulting the Moldovan government and civil society, the IRM opted to release a Special Accountability Report to evaluate progress made on the second action plan. With fewer research questions, this condensed report will inform implementation of Moldova's third action plan and development of future action plans, should Moldova transition to a two-year action plan cycle.

Institutional context and consultation

Promoting the principles of open government is one of the 12 pillars of the government's E-Transformation Agenda for 2014. Therefore, Moldova's participation in OGP was presented to the general public as part of the Government's e-governance initiatives, which aim to "increase transparency, improve Government efficiency and public service delivery, and fight corruption by harnessing the power of information technologies."² The E-Government Center leads the OGP process in the Republic of Moldova. The E-Government Center is a public institution created by the State Chancellery in 2010 to support executive efforts to implement an e-government agenda through technological modernization. It has significant influence over other institutions and is responsible for the implementation of OGP commitments. However, other Moldovan authorities do not have resources budgeted for OGP implementation, which limits their ability to plan ambitious

commitments. E-Transformation coordinators, central government authorities support implementation of the action plan by coordinating implementation activities within public institutions. Additionally, E-Transformation's Strategic Program of Technological Modernization (SPTM) proposes to ensure a more transparent, efficient and responsive government by 2020. It aims to use smart investments in IT and expand IT use in the public sector.³ The SPTM represents a strategic document on e-transformation of the Moldovan Government with general and specific objectives related to e-governance. The Moldovan Government decided to merge SPTM and OGP commitments; therefore, OGP commitments are related mostly to technological improvements. Moldovan civil society organizations (CSOs) including Open Government Institute, Soros Foundation, Transparency International, ADEPT were against such an approach and asked for two separate plans, but the Government maintained its initial decision. Civil society wanted to comply with OGP rules by having two-year action plans. The Government said it had insufficient human and financial resources for implementation.

Civil society representatives interviewed by the IRM researcher think, that compared to the first action plan, the second action plan was developed with more participation. Consultations were held, with the CSOs and private sector representatives, although only in the capital Chisinau. Upon recommendation from the first IRM Progress Report, the E-Government Center partnered with the American Chamber of Commerce (AmCham) to engage businesses in the consultation process. Additionally, the Working Group on E-Government and the Open Government Institute of the National Participation Council (NPC) volunteered to engage the Ministry of Education, the Ministry of Youth, and the Ministry of Finance for increased participation in the OGP.

The NPC—comprised of the Civil Society Working Group on E-Government and led by the Open Government Institute—drove the process of designing the second action plan. The Moldovan Government created the NPC as a consultative body based on Governmental Decision (19.01.2010). The NPC consists of 30 civil society representatives with a two-year mandate, divided into several working groups. The NPC facilitates dialogue between civil society members and the government, as well as participation in developing, implementing, monitoring, evaluation, and updating strategic planning documents. The Open Government Institute includes NPC members, CSO representatives, and other experts—including from the private sector. The Institute disseminates the values and principles of open government among CSOs and government representatives.

On 7 July 2013, the State Chancellery organized a public consultation event on the OGP progress in the Republic of Moldova. Approximately 70 representatives from civil society, the private sector, coordinators for e-transformation from all central public authorities, and the media were invited to the event. In addition, the E-Government Center invited international experts in the field of open government, such as Ms. Liia Hänni from the E-Government Academy of Estonia. At the event, the E-Government Center, which leads the open government agenda at the national level, presented a self-assessment report of the first action plan. Two CSOs presented findings on implementing the first action plan and recommendations for challenges in implementing open data commitments in Moldova. Key CSO findings emphasised that civil servants possess limited knowledge about open data and OGP values and principles, and that there are insufficient resources for OGP implementation. CSOs recommended enhancing the capacities of Moldovan civil servants, particularly to increase the knowledge of public servants on these issues.

At the end of the consultation event, the State Chancellery announced that the process for developing the next OGP action plan has started and requested contributions, suggestions, and recommendations from all participants over the next months. All stakeholders were able to submit suggestions in writing online.⁴ The deadline for sectorial consultations (e.g. ministries, public institutions) was September 2013, and the general public had to submit by October 2013. To consult a broader audience, the government created social media accounts on various platforms, including Facebook,⁵ Twitter,⁶ and Particip.gov.md.⁷ The Open Government Working Group involved about

70 representatives of Moldovan public institutions and civil society representatives in the consultation process.⁸ Each Ministry was invited to send their recommendations for the second action plan through September 2013. Suggestions and recommendations received from CSOs and government institutions were analyzed in depth. Suggestions like training civil servants, setting guidelines for publishing data, raising awareness among civil servants, and improving the participation portal were included in the final version of the action plan.⁹

The Civil Society Working Group on E-Government/Open Government identified a range of open government commitments requiring endorsement in the second action plan. A request in writing was made to the Prime-Minister, the State Chancellery, and the E-Government Centre. CSOs from the Open Government Working Group (WG) believe this consultation process was not as effective as envisioned because the Government did not include most of the CSOs' recommendations: the Government did not accept 27 recommendations; seven recommendations were partially accepted, and eight recommendations were fully accepted.¹⁰ The Government said it did not accept recommendations if other documents highlighted the issues, if the problems are solved or in the process of being solved, if the recommendations were not relevant, and if the legal framework impeded it.

As in the previous action plan cycle, the Government continued to delegate responsibility for monitoring the implementation process of the OGP action plan to the Working Group on E-Government and the NPC Open Government Institute. The Open Government Working Group has an open and pluralistic format: representatives from private sector and public institutions involved in the implementation of the OGP commitments at the national level are invited regularly to the meetings. Members of the Open Government Working Group have experience relevant to the OGP action plan (such as in economics, education, youth, civic participation, policy monitoring, and gender equality). That facilitates communication with public institutions and provides them with substantive recommendations that promote OGP values. The group had the same membership for the first action plan and used the same working format.

In 2014, the Open Government Working Group held two ad-hoc awareness-raising meetings for public servants and civil society representatives in Chisinau. The E-Government Center and the Open Government Institute organized both meetings and brought more than 40 participants.¹¹ The meetings explained the core principles of open government, the Open Government Partnership, the Moldovan Government's commitments, and the prospective areas for the 2014 action plan.

Although there were no meeting minutes, participants shared with the IRM researcher that the events were useful, especially due to the fact that CSOs had the opportunity to hear from the government authorities about how they believe the first action plan was implemented and to share their perspective on how and what should go into the second action plan. The action plan incorporated two milestones (1.5 Raise awareness among civil servants and 4.2 Civil servants communication training) from the working group discussions.

In May 2014, the mandate of the NPC ended and the State Chancellery did not select new CSOs. Consequently, the working group did not have an official mandate to continue monitoring the OGP action plan. The government point of contact interviewed by the IRM researched believed this situation was caused by the political instability and context in Moldova.

Due to the lack of funding and political instability in the country at that time, Moldovan civil society did not pressure the government to select new members of the NPC on time, and this influenced the monitoring of the 2014 OGP action plan implementation. As a result, the NPC did not monitor the action plan as in previous years.¹²

Dates of Coverage

This action plan covers 1 January 2014 through 31 December 2014.
For a fuller description of progress on the first OGP action plan,
please see the first IRM progress report covering 2012 through 2013.

¹ Republic of Moldova, “Government Resolution No.1096 on Approving the Action Plan 2014 for the Implementation of the Strategic Programme for Technological Modernization of Governance (E-Transformation),” 31 December 2013.

² Republic of Moldova, “Law No. 173, Ratifying the Financing Agreement between the Republic of Moldova and the International Development Association to Achieve the ‘Governance E-Transformation’ Project,” Official Gazette, 28 July 2011, [Romanian] <http://bit.ly/1nqaCDT>

³ Republic of Moldova, “Government Decision No. 710, Approving a Strategic Program of Technological Modernization of Government (E-Transformation),” Official Gazette, 20 September 2011, [Romanian] <http://bit.ly/1fk66T7>

⁴ “Cancelaria de Stat a Lansat Consultarile Publice pe Marginea Planului de Actiuni Pentru o Guvernare Deschisa 2014-2015,” Particip.gov.md, <http://bit.ly/1IA348x>; Public consultation on the action plan development is welcome to this email: governare.deschisa@gov.md

⁵ “Moldova Pentru o Guvernare Deschisa,” Facebook, <http://on.fb.me/1X7ga8j>

⁶ “#GuvDeschisaMD,” Twitter, <http://bit.ly/1O4gAWO>

⁷ “Cancelaria de Stat a Lansat Consultarile Publice pe Marginea Planului de Actiuni Pentru o Guvernare Deschisa 2014-2015,” Particip.gov.md, <http://bit.ly/1IA348x>

⁸ More details on this consultation can be found at: “Cancelaria de Stat a Lansat Consultarile Publice pe Marginea Planului de Actiuni Pentru o Guvernare Deschisa 2014-2015,” Particip.gov.md, <http://bit.ly/1IA348x>

⁹ “Noile Tehnologii, Pentru o Guvernare Participativa Mai Deschisa,” Particip.gov.md, <http://bit.ly/1Q4wWQO>

¹⁰ Please see the matrix of recommendations and government decision: “Sinteza Obiectiilor si Propunerilor la Proiectul Hotararii Guvernului Republicii Moldova Pentru Aprobarea Planului de Actiuni Privind Implementarea Programului Strategic Pentru Modernizarea Technologica a Guvernarii Pentru Anul 2014,” Participid.gov.md, <http://bit.ly/1PHjmls>

¹¹ “Lansarea Consultarilor Publice pe Marginea Planului de Actiuni Pentru o Guvernare Deschisa Pentru Anii 2014-2015,” Centrul de Guvernare Electronica, <http://bit.ly/1KzU09M>

¹² ADEPT, a member of NPC, monitored implementation of the 2012-2013 action plan. ADEPT, “RAPORT DE EVALUARE a Implementarii Planului de Actiuni Pentru o Guvernare Deschisa in Anul 2012” by Petru Culeac (Report, Moldova, 2013), <http://bit.ly/1JHGErg>

II. Commitment implementation

As part of OGP, countries make commitments in a two-year action plan, although the second Moldovan action plan was designed only for one year. Table 1 summarizes each commitment, including level of completion, ambition, whether it falls within Moldova's planned schedule, and the key next steps in future OGP action plans.

All OGP participating governments develop OGP country action plans that develop concrete commitments over an initial two-year period. Governments begin their OGP country action plans by sharing existing efforts related to open government, including specific strategies and ongoing programs. Action plans then set out governments' OGP commitments, which stretch practice beyond its current baseline. Commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area.

Commitments should be appropriate to each country's unique circumstances and policy interests. OGP commitments should also be relevant to OGP values laid out in the OGP Articles of Governance and Open Government Declaration signed by all OGP participating countries. The IRM uses the following guidance to evaluate relevance to core open government values:

Access to information

Commitments around access to information:

- Pertain to government-held information, as opposed to only information on government activities. As an example, releasing government-held information on pollution would be clearly relevant, although the information is not about "government activity" per se;
- Are not restricted to data but pertain to all information. For example, releasing individual construction contracts and releasing data on a large set of construction contracts;
- May include information disclosures in open data and the systems that underpin the public disclosure of data;
- May cover both proactive and/or reactive releases of information;
- May cover both making data more available and/or improving the technological readability of information;
- May pertain to mechanisms to strengthen the right to information (such as ombudsman's offices or information tribunals);
- Must provide open access to information (it should not be privileged or internal only to government);
- Should promote transparency of government decision making and carrying out of basic functions;
- May seek to lower cost of obtaining information;
- Should strive to meet the 5 Star for Open Data design (<http://5stardata.info/>).

Civic participation

Commitments around civic participation may pertain to formal public participation or to broader civic participation. They generally should seek to "consult," "involve," "collaborate," or "empower," as explained by the International Association for Public Participation's Public Participation Spectrum (<http://bit.ly/1kMmIYC>).

Commitments addressing public participation:

- Must open up decision making to all interested members of the public; such forums are usually “top-down” in that they are created by government (or actors empowered by government) to inform decision making throughout the policy cycle;
- Can include elements of access to information to ensure meaningful input of interested members of the public into decisions;
- Often include the right to have your voice heard, but do not necessarily include the right to be a formal part of a decision making process.

Alternately, commitments may address the broader operating environment that enables participation in civic space. Examples include but are not limited to:

- Reforms increasing freedoms of assembly, expression, petition, press, or association;
- Reforms on association including trade union laws or NGO laws;
- Reforms improving the transparency and process of formal democratic processes such as citizen proposals, elections, or petitions.

The following commitments are examples of commitments that would **not** be marked as clearly relevant to the broader term, civic participation:

- Commitments that assume participation will increase due to publication of information without specifying the mechanism for such participation (although this commitment would be marked as “access to information”);
- Commitments on decentralization that do not specify the mechanisms for enhanced public participation;
- Commitments that define participation as inter-agency cooperation without a mechanism for public participation.

Commitments that may be marked of “unclear relevance” also include those mechanisms where participation is limited to government-selected organizations.

Public accountability

Commitments improving accountability can include:

- Rules, regulations, and mechanisms that call upon government actors to justify their actions, act upon criticisms or requirements made of them, and accept responsibility for failure to perform with respect to laws or commitments.

Consistent with the core goal of open government, to be counted as “clearly relevant,” commitments must include a public-facing element, meaning that they are not purely internal systems of accountability. While such commitments may be laudable and may meet an OGP grand challenge, they do not, as articulated, meet the test of “clear relevance” due to their lack of openness. Where such internal-facing mechanisms are a key part of government strategy, it is recommended that governments include a public facing element such as:

- Disclosure of non-sensitive metadata on institutional activities (following maximum disclosure principles);
- Citizen audits of performance;
- Citizen-initiated appeals processes in cases of non-performance or abuse.

Strong commitments around accountability ascribe rights, duties, or consequences for actions of officials or institutions. Formal accountability commitments include means of formally expressing grievances or reporting wrongdoing and achieving redress. Examples of strong commitments include:

- Improving or establishing appeals processes for denial of access to information;
- Improving access to justice by making justice mechanisms cheaper, faster, or easier to use;
- Improving public scrutiny of justice mechanisms;
- Creating public tracking systems for public complaints processes (such as case tracking software for police or anti-corruption hotlines).

A commitment that claims to improve accountability, but assumes that merely providing information or data without explaining what mechanism or intervention will translate that information into consequences or change, would **not** qualify as an accountability commitment. See <http://bit.ly/1oWPXdl> for further information.

Technology and innovation for openness and accountability

OGP aims to enhance the use of technology and innovation to enable public involvement in government. Specifically, commitments that use technology and innovation should enhance openness and accountability by:

- Promoting new technologies that offer opportunities for information sharing, public participation, and collaboration.
- Making more information public in ways that enable people to both understand what their governments do and to influence decisions.
- Working to reduce costs of using these technologies.

Additionally, commitments that will be marked as technology and innovation:

- May commit to a process of engaging civil society and the business community to identify effective practices and innovative approaches for leveraging new technologies to empower people and promote transparency in government;
- May commit to supporting the ability of governments and citizens to use technology for openness and accountability;
- May support the use of technology by government employees and citizens alike.

Not all e-government reforms improve openness of government. When an e-government commitment is made, it needs to articulate how it enhances at least one of the following: access to information, public participation, or public accountability.

Recognizing that achieving open government commitments often involves a multiyear process, governments should attach time frames and benchmarks to their commitments that indicate what is to be accomplished each year, whenever possible. This report details each of the commitments the country included in its action plan, and analyzes them for their first year of implementation.

All of the indicators and methods used in the IRM research can be found in the IRM Procedures Manual, available at (<http://www.opengovpartnership.org/about/about-irm>). One measure deserves further explanation, due to its particular interest for readers and usefulness for encouraging a race to the top between OGP-participating countries: the “starred commitment.” Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria:

1. It must be specific enough that a judgment can be made about its potential impact. Starred commitments will have "medium" or "high" specificity.
2. The commitment's language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability.
3. The commitment would have a "moderate" or "transformative" potential impact if completely implemented.
4. Finally, the commitment must see significant progress during the action plan implementation period, receiving a ranking of "substantial" or "complete" implementation.

Finally, the graphs in this section present an excerpt of the wealth of data the IRM collects during the progress reporting process. For the full dataset for Moldova, and all OGP participating countries, see the OGP Explorer.¹

Table 1: At a Glance	
Number of commitments:	4
Number of milestones:	13
<i>Level of Completion by Milestone</i>	
Completed:	1 (8%)
Substantial:	6 (46%)
Limited:	2 (15%)
Not started:	4 (31%)
<i>Number of Milestones with:</i>	
Clear relevance to an OGP value:	12 (92%)
Transformative potential impact:	0
Substantial or complete implementation:	7 (54%)
All three (★)	0

¹ The OGP Explorer provides the OGP community—civil society, academics, governments, and journalists—easy access to the wealth of data that OGP has. It is available at: <http://www.opengovpartnership.org/explorer/landing>

Table 2: Summary of Commitments

	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
1.1. Government open data portal			✓		✓			✓		✓					✓	
1.2. Principles of open data		✓			✓						✓				✓	
1.3. Action plan for open data			✓		✓						✓	✓				
1.4. Guidelines for publishing open data			✓		✓						✓					✓
1.5. Raise awareness among civil servants			✓		✓						✓				✓	
2.1. Government email system			✓		Unclear					✓			✓			
2.2. Audit public websites			✓		✓			✓		✓					✓	
2.3. E-petitions requirements		✓			✓		✓	✓			✓	✓				
3.1. Transparency at the local level			✓		✓			✓		✓			✓			
3.2. Communication at the local level			✓		✓			✓		✓			✓			
4.1. Public consultations principles				✓		✓	✓				✓				✓	
4.2. Civil servants communication training				✓		✓					✓				✓	
4.3. Online participation platform				✓	✓	✓		✓			✓	✓				

Commitment 1: Promote the principles of open data by default

- 1.1. Improving the government open data portal. A new version (V3.0) of government open data portal *www.date.gov.md* will be designed and deployed with the functionality to publish data through the API interface.
 - State Chancellery / January 2014
- 1.2. Promoting principles of open data. The Government will draft and adopt the Concept Paper on adoption and promotion of open data principles.
 - State Chancellery in cooperation with the Ministry of Information Technology and Communications, National Center for Personal Data Protection / February 2014
- 1.3. Setting up an action plan for open data. The Government Decision on the approval of the biannual Action Plan (2014-2015) on the application and promotion of open data principles in the central public administration authorities will be drafted.
 - State Chancellery, Ministry of Information Technology and Communications / March 2014
- 1.4. Setting up guidelines for publishing open data. The Government Decision on approval of the guidelines for the operation of the *www.date.gov.md* portal and publishing of government data will be drafted.
 - State Chancellery / April 2014
- 1.5. Raising awareness among civil servants. Trainings for at least 50 civil servants will be delivered in order to raise awareness about open government and open data.
 - State Chancellery, National Center for Personal Data Protection / Throughout the year

Commitment Overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
1.1. Government open data portal			✓		✓			✓		✓						✓
1.2. Principles of open data		✓			✓						✓			✓		
1.3. Action plan for open data			✓		✓						✓		✓			
1.4. Guidelines for publishing open data			✓		✓						✓					✓
1.5. Awareness among civil servants			✓		✓						✓			✓		

This commitment includes five milestones and is a continuation of open data commitments from the previous action plan. While this commitment can be considered partially pre-existing, new milestones including the open data portal and related targets set for the 2014 action plan stretch the commitment beyond its initial scope.

Milestone 1.1: Improving the government open data portal. The State Chancellery committed to launch a new website that will allow them to publish data through an Application Programming Interface (API), which should increase access to open data held by the central and local public institutions and also improve interaction between users and public institutions in accessing that data.

This milestone was completed. In February 2014, on International Open Data Day, the Moldovan Government launched the 3.0 version of the Open Data portal. Public authorities, civil society, NPC, private sector, academics, and World Bank representatives attended the launch. The new version of the portal is connected to the CKAN, a powerful data management system and an open technological platform that makes data accessible by providing tools to streamline publishing, sharing, finding, and using data. It provides public institutions with the possibility of publishing mass data straight from their information systems through an API, which will increase citizens' access to public information. Publishing data through the API is important for open data re-use such as building apps, portals, platforms that use the data. Through the API one ensures that the data publishing is done automatically and regularly, rather than through manual updates which are subject to human error.

However, the IRM researcher found that publishing data through the API interface has a minor potential impact because it represents a positive but only incremental step in the relevant OGP area. The IRM researcher considers this to be a pre-existing milestone because the previous action plan set a target to publish data through an API and the current milestone improves on the functionality of publishing data through the interface.

Milestone 1.2: Promoting principles of open data. In 2013, the E-Government Center started the process of developing open data, which was included as a milestone for the 2014 action plan. The document called Concept of Open Government Data defines and establishes the principles of open data, making a connection to the international legal framework and to the best practices in this field, thus enabling the Republic of Moldova to advance citizen access to public information.¹ Several CSOs requested this milestone during the implementation of the 2012-2013 OGP action plan and the consultation process for the 2014 action plan. Previously, Moldovan Parliament connected open data legislation to the EU legislation by adopting the Law No. 305 on the Reuse of Public Sector Information.² Later, the Government approved Government Decision³ concerning the methodological norms for implementing Law No. 305.

The milestone was completed by the Concept Paper on adopting and promoting open data principles – the Government Decision 700 of 25.08.2014.⁴ The key stakeholders involved were the State Chancellery, the Ministry of Information Technology and Communications (MITC), and the National Center for Personal Data Protection. MITC has an advisory body that includes civil society representatives. The Open Government Working Group's CSOs were consulted on the draft of the document, and they fully support it given that it is based on the latest E.U. Directive on reuse of public sector information.⁵ In this context, this action is considered to be new, with transformative potential impact, because it increases government transparency, offers citizens access to public information and enables the reuse of public documents and data.

Milestone 1.3: Setting up an action plan for open data. Following milestone 1.2., the State Chancellery and the Ministry of Information Technology and Communications committed to develop a biannual action plan (2014-2015) to implement the Open Data Concept by the central public authorities. The IRM researcher found this milestone to have moderate potential impact because it provides tangible results such as open data action plan, but public institutions still will have to implement it to produce expected results.

However, the implementation of this milestone has not started yet. The reasons for delay are unknown and could not be explained by the governmental stakeholders interviewed by the IRM researcher.

Milestone 1.4: Setting up guidelines for publishing open data. During implementation of the first action plan, CSOs asked for clear requirements to help public institutions publish their data. The first OGP progress report mentioned problems with the format in which the data currently is available. Public institutions continue to use different formats, some of which are not machine-readable.⁶ According to the 2013 report by the Independent Journalism Center, to ensure that open data is relevant and

useful for mass media and civil society, it is important that each institution identifies clear criteria for determining the full range of their data to be opened.⁷ One of the recommendations included in the first OGP progress report was to strengthen collaboration between civil society, open data experts and government. This aimed to develop well-defined criteria for publishing complete, comprehensive, relevant, easy to access, and regularly updated datasets.

Thus, a methodology that clarifies the mechanism for publishing open data is a response to civil society's recommendation. The milestones 1.3 and 1.4 are interconnected because they set procedural standards for open data. This milestone was developed based on the achievement from the previous OGP action plan in the field of open data, and it has a moderate potential impact.

The IRM researcher found this milestone was completed with the adoption of the Government Decision 701 of 25.08.2014,⁸ which states the mechanism and procedure for publishing open data, responsible persons for publishing the open data, their obligations, and the types of information which should be published. There are no time frames for data publishing. It is a major step forward in the open data relevant policy area, but has moderate potential impact because it does not establish a monitoring or enforcement mechanism for publishing the open data.

Milestone 1.5: Raising awareness among civil servants. Building civil society capacity to use new technologies and implementation of the OGP agenda in Moldova was part of the first action plan. The milestone promotes the principle of open data by default. Given that public institutions had difficulties in publishing timely and qualitative open data the adoption Parliament's and the Government's new normative acts, this is an important achievement in the overall commitment.

The IRM researcher found that this commitment was substantially completed. The E-Governance Centre, Moldova Open Data Initiatives, and the Open Government Institute organized two workshops with 140 public servants on issues of open data.⁹ The E-Governance Centre held monthly sessions with open data coordinators. The Public Administration Academy for Moldovan civil servants organized similar seminars.¹⁰

The main purpose of the events was to continue building the capacity of public servants responsible for open data by reaching out to all open data coordinators from ministries and subordinating agencies. These meetings served as a good platform for addressing open data in a broader context. Such meetings are important due to the high fluctuation of human resources in the public sector, including open data coordinators.

This commitment is relevant for the OGP agenda in the Republic of Moldova and targets mostly access to information. Civil society and the media requested that it be included in the action plan. A key strength of the commitment is close cooperation between government and CSOs, i.e. CSOs and the government delivered many activities jointly. Failure to set up an action plan for open data represents one of the key shortcomings under this commitment.

To fully implement this commitment, the IRM researcher recommends that the State Chancellery and the MITC develop the open data action plan for central public authorities to implement the Open Data Concept. Once a plan is in place, public institutions should be encouraged to implement it.

¹ Republic of Moldova, "The Concept of Open Government Data," Open Data Portal, 3 June 2014, <http://bit.ly/1N5u6fN>

² Republic of Moldova, "Law No. 305 of 26.12.2012," 26 December 2012.

³ Republic of Moldova, "Decision No. 886 of 11.08.2013," 11 August 2013.

⁴ Republic of Moldova, "Government Decision No. 700 of 25.08.2014," 25 August 2013, <http://bit.ly/1KnVsxh>

⁵ Republic of Moldova, "Government Decision No. 700 of 25.08.2014," 25 August 2013, <http://bit.ly/1KnVsxh>

⁶ Open Government Partnership, "Moldova Progress Report 2012-2013" by E. Mihalas (Report, Washington, D.C., 2014).

⁷ Independent Journalism Center, "Assessing the Opening of Public Government Data" by D. Lazur (Report, Chisinau, 2013), <http://bit.ly/1daQIKc>

⁸ Republic of Moldova, "Government Decision No. 701 of 25.08.2014," 25 August 2014, <http://bit.ly/1UinaQN>

⁹ Republic of Moldova, “Government Decision No. 701 of 25.08.2014,” 25 August 2014, <http://bit.ly/1UinaQN>

¹⁰ Please see: Republic of Moldova, “Government Decision No. 701 of 25.08.2014,” 25 August 2014, <http://bit.ly/1UnU1yh>

Commitment 2: Ensure transparency in the work of the public administration authorities and access to public information

- 2.1. Encouraging the use of government e-mail system by the central public administration authorities. An audit report on the utilization of the government email system by the central public administration authorities will be drafted and shared with all the central public administration authorities in order to increase the use of government e-mail addresses for public service.
 - State Chancellery /February 2014
- 2.2. Auditing public websites. The websites of the central public administration authorities will be audited on a yearly basis in terms of their compliance with the Government Decision no 188 of April 3, 2012 on the official webpages of the public administration authorities.
 - Ministry of Information Technology and Communications, State Chancellery, central public administration authorities / December 2014
- 2.3. Evaluating requirements for implementing e-petitions. The Government will evaluate the regulatory, institutional and technical frameworks in order to implement the online claim (petition) system.
 - State Chancellery, Ministry of Justice / December 2014

Commitment Overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
2.1. Government email system			✓		Unclear					✓			✓			
2.2. Audit public websites			✓		✓			✓		✓					✓	
2.3. E-petitions requirements		✓			✓		✓	✓			✓		✓			

This commitment includes three milestones with different potential impacts, especially in ensuring transparency of public institutions. Civil society representatives and the Moldovan Government believe significant progress has been made during the first year of the action plan. They point to transparency in the work of the public administration authorities and access to public information, especially through increased public information, auditing, and standardization of the websites of the public institutions. Milestones 2.1 and 2.3 were not started and areas related to mainstreaming the government e-mail system, and a feasibility study for implementing e-petitions in Milestone 2.3 still needs work. Having all public officials use a government email address is helpful for tracking, but does not reflect OGP values, as this is an internal system.

Milestone 2.1: Encouraging the use of government e-mail system by the central public administration authorities. This milestone derived from the first action plan. The IRM researcher found that the language of the milestone was not clearly relevant to OGP values because it does not have a public-facing element. Through the E-Government Center the Moldovan Government provides assistance to public institutions to ensure that civil servants are in compliance with a November 2012 Government Decision requiring the use of official “.gov” extension emails for all government-related work. In the past, Moldovan public servants used multiple email accounts and it was difficult for the public to

know if an email from a public servant was sent in a personal or official capacity. The *.gov.md extension adds credibility, and the citizen can be sure that he receives information from an official trusted source. According to the 2013 government self-assessment report, 5,089 official government e-mail accounts were created in 62 public institutions, including 12 ministries. This milestone was to produce an audit report on the central public administration authorities' use of the government's email system and to share the report with the authorities to improve it.

The IRM researcher found that implementation of this milestone has not started, and the IRM researcher was unable to tell from the government and civil society representatives why the milestone is delayed. More monitoring and enforcement is needed to get all public administration officials to use the “.gov” email addresses. The milestone language is vague .

This milestone would have a minor potential impact in strengthening public integrity, if implemented. As mentioned in the IRM Moldova Progress Report 2012-2013, email accounts are not sufficient to enhance the OGP value of public participation or public integrity.

Milestone 2.2: Auditing public websites. This is a pre-existing milestone with minor potential impact in strengthening public integrity. In April 2012, the Moldovan Government approved Decision No. 188¹ on the public institutions' websites, which provided clear criteria to develop websites for ministries, agencies and other public authorities.

This milestone was substantially completed, as throughout 2014 the websites of the central public authorities (CPAs) were audited and reviewed by both MITC and the Open Government Institute. The Moldovan Government mainstreamed the new Drupal platform, which is an easily navigated web platform and facilitates a quicker searches. Two ministries and one agency launched their websites using the new platform, and four other ministry websites are expected to introduce the new platform shortly. However, MITC's review of 16 Moldovan ministries² and six CPAs³ followed provisions revealed⁴ that CPAs do not always publish information about the international normative acts related to their field of activity. Although the websites allow citizens to interact with the CPAs by sending messages or questions, they do not confirm receipt of their messages or provide an expected date for an answer to their questions. Eleven out of twenty-two websites did not provide an opportunity for citizens to subscribe to the news, events, or announcements.

Between October and November 2014, the Open Government Institute carried out a review of CPAs' current practices related to platforms for decision making transparency and citizen-engagement processes. Seven ministries⁵ scored top marks for embedding a number of practices and platforms related to citizen engagement and transparency in the decision making process. The other CPAs score modestly because their information is insufficiently developed and only occasionally updated.

Open Government Institute experts also analyzed the degree to which other online platforms are used to engage citizens. Even the more widely known resources suffer from a lack of public engagement. In 2014, www.particip.gov.md, a widely known platform managed by the State Chancellery of Moldova, received only eighteen comments on the six hundred and eighteen policy documents posted for public review and consultation.

¹ Government Decision 188, 3.04. 2012 <http://lex.justice.md/viewdoc.php?action=view&view=doc&id=342699&lang=1>

² Ministries of: Foreign Affairs and European Integration; Economy; Finance; Agriculture; Transportation & Road Infrastructure; Regional Development & Construction; Environment; Education; Health; Labour Social Protection and Family; Culture; Justice; Internal Affairs; Defence; Information Technology and Communications; Youth and Sports;

³ Silviculture Agency *Moldsilva*; Material Reservations Agency; Tourism Agency; Agency for Land Relations and Cadastre; Bureau for Interethnic Relations and National Bureau of Statistics.

⁴ The Monitoring Report of the CPAs' websites can be found at:

http://www.mtic.gov.md/sites/default/files/transparency/plans_and_reports/raport_evaluarea_pagini_web_2014.pdf

⁵ Ministries of: Health; Internal Affairs; Education; Environment; Economy; Finance and Technologies and Communications

Civil society representatives regularly noted on social media that the platform is not very user-friendly. Representatives of the State Chancellery counter that even in cases when policy documents are sent for consultation, feedback on documents is not given. Thus, the problem is in the quality of the platform from a technical standpoint and also the lack of public engagement or awareness of the platform as a tool for engagement. The legal framework provides several opportunities (for instance, public consultations) for engagement in decision making process. Feedback from CPAs also is important. The portal creates additional incentives for public participation. According to the OGP contact, particip.gov.md will be redesigned in the near future.

Milestone 2.3: Evaluating requirements for implementing e-petitions. In the context of Moldovan legislation, “petition” means any solicitation, complain, claim or intimation submitted to the relevant public authorities, which challenges an administrative act or failure to examine a request within the established time frames (Law No. 190 on Petitions, 19.07.1994). An e-petition system was a commitment in the first action plan. With this commitment, the State Chancellery and E-Government Center committed to create a petition process that is transparent at all levels, to inform citizens/petitioners of the stage of the petition and the names of the officials responsible for resolving complaints. The first IRM progress report recommended further work on its implementation. The language of this milestone in the second action plan describes more clearly the activities to be taken and the expected output such as evaluation of the regulatory, institutional and technical frameworks in order to implement the online complaint system. The language does not include performance indicators for application of this system, and it is not clear to what extent recommendations from the previous progress report were taken into consideration. The specificity of this milestone is low.

The IRM researcher found that this milestone has not been started. The IRM researcher could not establish the reasons for the delay or any future plans about its implementation. CSOs and civil servants consulted by the IRM researcher were not aware of the reasons either.

In conclusion, two out of three milestones (2.2 Auditing public websites and 2.3 E-petitions requirements) of this commitment, which aimed to increase access to public information and ensure transparency in the work of public authorities, were pre-existing and were not started. If implemented, they would have a minor to moderate impact on the transparency and access to information.

The IRM researcher recommends taking measures that would help to bring to the CPA websites more interactive features to engage citizens. Introducing Drupal to all government websites would make the websites more navigable. The researcher also recommends the State Chancellery consider making the platform more user-friendly. Additional efforts to publicize the platform could help to increase citizen usage. Another recommendation is to evaluate requirements and to implement an e-petition system. It would increase the public accountability and citizen access to information.

Commitment 3: Ensure transparency of governance at the local level

- 3.1. *Fostering transparency at the local level. The Local Acts Registry www.actelocale.md will be technologically improved in order to facilitate its use by citizens and increase the amount of local documents available online to the public.*
 - State Chancellery / March 2014
- 3.2. *Improving communication at the local level. The regulation on the use of the single access portal www.actelocale.md in the communication and interaction among the State Chancellery's units and the involvement of the local public administration authorities will be drafted and improves.*
 - State Chancellery / September 2014

Commitment Overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
3.1. Transparency at the local level			✓		✓			✓		✓				✓		
3.2. Communication at the local level			✓		✓			✓		✓				✓		

This is a pre-existing, two-part commitment, which was partially implemented as part of the 2012-2013 OGP action plan. The first IRM progress report recommended involving local public authorities in implementing the OGP agenda in Moldova. The progress report also recommended further work on basic implementation of milestones.

Milestone 3.1: Fostering transparency at the local level. This milestone called for technological improvement of the Local Acts Registry (www.actelocale.md) to facilitate citizen use and increase the amount of local documents publicly available online. The online portal existed prior to OGP as part of the USAID-sponsored Business Regulatory, Investment, and Trade Environment (BRITE)¹ project to build strategic internal and external communications capacity within the Moldovan Government and empower civil servants to embrace and enact reforms. Its inclusion in the second action plan represents a minor but positive step forward for strengthening the interaction between the structures of the State Chancellery and local authorities. The portal also could be used to publish local authority decisions. This milestone was started and has limited completion.

Discussions with the representatives of the Congress of Local Public Authorities (CALM) revealed that only about 30 percent of the local authorities use the website for public consultation or to publish their decisions. There are several reasons for this: insufficient promotion of the portal, limited capacity and resources of the local public authorities, low awareness among LPAs, and unwillingness to publish decisions. Additionally, the 2006 Law on Administrative Decentralization, which ensures local autonomy, prevents the State Chancellery from compelling local authorities to use the portal.²

Milestone 3.2: Improving communication at the local level. The milestone aims to develop regulation on using www.actelocale.md as a single point of access for communication and interaction between structures of the State Chancellery and local authorities.³ This facilitates citizen access to information. However, the portal does involve citizens in decision making processes or in increasing transparency at the

local level. Therefore, this pre-existing milestone has minor potential impact on ensuring transparency at the local level.

This milestone was started and has a limited completion rate because the government suspended it due to the insufficient resources. The BRITE project agreed to cover the costs and the initiative was reinforced.⁴

In conclusion, this two-part commitment comes from the first action plan, and aims to improve interaction between citizens and local public authorities and to increase transparency at the local level. But it has not been fully implemented yet because of insufficient resources, lack of enforcement mechanisms, and poor promotion. While technological improvements are important, they are not sufficient in ensuring governance transparency at the local level.

The IRM researcher recommends promoting the registry among the Local Public Authorities (LPAs) and setting up an enforcement mechanism that would encourage or oblige the LPAs to use the Local Acts Registry for publishing their decisions. In addition, the IRM researcher recommends having a specific commitment in the next action plan that targets local government transparency beyond technological improvements.

¹ Business Regulatory, Investment and Trade Environment (BRITE), “Strategic Communications,” USAID, <http://bit.ly/1O4jLxU>

² Republic of Moldova, “Law No. 435 of 28.12.2006,” 28 December 2006, <http://bit.ly/1X7o3e2>

³ See “Registrul de Stat,” Republic of Moldova, lex.justive.md

⁴ See Business Regulatory, Investment and Trade Environment (BRITE), USAID, www.brite.md

Commitment 4: Encourage participatory decision making through electronic communication platforms

- 4.1. *Adopting new public consultations principles. The Government in collaboration with civil society will draft the guiding rules of public consultation in line with the OECD principles for the public administration authorities.*
 - State Chancellery, National Center for Personal Data Protection, National Participatory Council / June 2014
- 4.2. *Training civil servants for improved communication. Training on the use of online tools of communication with citizens in the decision-making process will be offered to at least 50 civil servants in order to improve online communication between government and citizens.*
 - State Chancellery / December 2014
- 4.3. *Improving online participation platform. Expand the public participation online platform www.particip.gov.md, by developing and implementing the Single passport of draft document evolution, including the first draft, related documents, summary of recommendations, updated versions of the document, the approved final document, link to the approved document published on the online State Register of Legal Acts www.lex.justice.md.*
 - State Chancellery / December 2014

Commitment Overview	Specificity				OGP value relevance				Potential impact				Completion			
	None	Low	Medium	High	Access to information	Civic participation	Public accountability	Tech. and innov. for transparency and accountability	None	Minor	Moderate	Transformative	Not started	Limited	Substantial	Complete
4.1. Public consultations principles				✓		✓	✓				✓				✓	
4.2. Civil servants communication training				✓		✓				✓					✓	
4.3. Online participation platform				✓	✓	✓		✓			✓		✓			

This is a three-part, new commitment, that was recommended highly by CSOs—and especially the E-Government/Open Government Working Group—during the consultation process. The commitment is important because it creates more mechanisms for citizen involvement in decision making processes. The language of each milestone provides clear, measurable, verifiable milestones for achieving the goal.

Milestone 4.1: Adopting new public consultations principles. This is a new milestone with moderate potential impact on increasing civic participation in decision making processes. During consultation process, the E-Government/Open Government Working Group stated that public institutions should have more clear, uniform regulations and guidance for citizen involvement in decision making processes, based on OECD principles.³

The Open Government Institute and Estonian E-Governance Academy jointly implemented the milestone was implemented, with the support of the Estonian Ministry of Foreign Affairs.¹ As part of the milestone, a study was conducted to assess the current CPA citizen engagement practices. Subsequently, the Guide for Civil Servants on Citizen Engagement² was developed. The State Chancellery will decide how to implement all outputs, including the Guide.

Milestone 4.2: Training civil servants for improved communication. The State Chancellery and key partners committed to train at least 50 civil servants in using the Guide for Civil Servants on Citizen Engagement and online tools to communicate with citizens. A similar commitment was part of the 2012-2013 action plan, but it focused more on using social media for increasing transparency of public authorities. This is considered a new commitment with a moderate impact on increasing public integrity and ensuring citizens participation in decision making processes. It aims to increase the knowledge and competencies of the civil servants, but it does not automatically ensure citizen participation in decision making processes. The application of acquired knowledge by the civil servants and their efforts to involve citizens still need to be assessed.

The IRM researcher found that this milestone was completed. The Open Government Institute, E-Government Center, and Estonian E-Governance Academy delivered capacity-building trainings for both CSOs and public servants on citizen engagement.³ This added value as the participants had an opportunity to learn not only about citizen engagement in decision making processes, but also about the experience of their Estonian colleagues.

According to an unpublished report of the Open Government Institute, participants believe that such training programs or workshops should be accessible to all public servants and interested CSOs, and should present as many successful practices in the field as possible. Most of the participants of the capacity-building program think that the programs should be longer, and cover more experiences, best practices, and concrete examples from other countries. Additionally, participants would like such programs to include more practical exercises.

Milestone 4.3: Improving online participation platform. A milestone in the first action plan also focused on improvements to the website (www.particip.gov.md). However, based on the new targets set for the State Chancellery in the current action plan, it is considered a new milestone. The milestone calls for the option to publish online comments and recommendations on draft policies while they are in the public consultation process. The IRM researcher determined that this milestone has moderate potential impact in ensuring transparency of public authorities and increasing civic participation in decision making processes. As written, this commitment should provide citizens with more information on the process of making public policies. It is expected that it will facilitate monitoring and adoption of public policies by central public authorities.

The IRM researcher determined that implementation of this milestone was not started due to the lack of funds. The government officials interviewed by the IRM researcher mentioned that they are negotiating with a few international development partners to secure financial support, and in the near future, the online participation platform will be redesigned. The civil society representatives interviewed by the IRM researcher mentioned that the government should allocate public funds for this milestone as well.

To fully complete this commitment, the IRM researcher recommends that the State Chancellery institutionalizes the adopted public consultation principles and encourages wide usage of the Guide for Civil Servant on Citizens Engagement. Training programs on citizen engagement should be accessible to the wider pool of public servants and interested CSOs. It would be beneficial to include more practices exercises in these training programs.

Efforts to redesign the online participation platform should be accelerated. As recommended in the previous commitment, the platform should be made more user-friendly, to encourage widespread citizen uptake.

¹ See “OpenGovernment,” Open Government Institute, <http://bit.ly/1MYv9g9>

² “Citizen Engagement Guide,” E-Governance Academy, Open Government Institute Moldova, and Moldova E-Government Center, <http://bit.ly/1ieWCie>

³ “OpenGovernment,” Open Government Institute, <http://bit.ly/1MYv9g9>

³ OECD, “Principles for Evaluation of Development Assistance” by the Development Assistance Committee (Report, Paris, 1991), <http://www.oecd.org/development/evaluation/2755284.pdf>

III. Recommendations

This section of the report recommends general next steps for OGP, rather than for specific commitments.

A. Civil society recommendations

1. Have a broader scope for commitments. Civil society representatives believe that the Moldovan action plans should have a broader scope for commitments. CSOs recommend that the commitments in the next action plan go beyond open data, web portals, and other technology aspects. The commitments in the action plan are relevant mainly for Access to Information and Technology and Innovation, but the action plan should have several different sector-related commitments so that open government is part of anticorruption, public finance, health, education, social protection, environment, roads, and other sectors. Thus, the action plan should contain more ambitious commitments, which could be sector-specific and different from the e-government-related commitments that have predominated both action plans of Moldova. This also would ensure sustainability of the initiative at the national level and would pursue the OGP goals.

2. Include specific linkages with social accountability mechanisms. Another specific recommendation provided by the civil society is to include specific linkages with social accountability mechanisms (Moldova is part of the Global Partnership for Social Accountability (GPSA)).¹ More actions are needed to bring citizens closer to public decision making processes and to create an environment in which citizen feedback is used to solve fundamental service delivery problems and to strengthen the performance of Moldovan public institutions. Increasing civil society engagement in monitoring government performance, providing feedback for improving governance, and development reforms should be a government priority. It could be achieved through strengthening civil society and CSOs. This kind of engagement would enable Moldovan citizens and CSOs to engage with policymakers and public service providers to bring about greater public accountability and openness of the government.

3. Address local government issues and mainstream OGP components at the local level. Another specific recommendation provided during the consultation process by civil society is for the action plan to address local government components, as evidenced by more OGP commitments related to the municipal level. This would mainstream OGP commitments, values and principles at the local level and would increase the local engagement, participation and ownership. It would enable people to hold the local governments accountable, as well.

4. Reinforce the NPC. The NPC could be empowered to take part in developing, implementing, monitoring, evaluation, and updating the strategic planning documents, such as the action plan.³ Although the 2014 IRM progress report highlighted coordination between the Moldovan Government and civil society actors, the majority of CSOs' recommendations were not included into the 2014 action plan. Moreover, CSOs were involved poorly in promoting the OGP commitments and resulting outputs, and this had an overall moderate effect on this action plan cycle. The IRM researcher notes that efforts are underway to foster collaboration between CSOs and the government in the planning and execution of the new action plan.

At present, the Moldovan Government is in the process of recruiting the new members of the NPC.² Civil society representatives interviewed by the IRM researcher recommend reinforcing the NPC by reelecting civil society representatives and involving NPC in designing, implementing, monitoring, evaluating, and updating strategic documents. Civil society representatives, particularly within the NPC, could have a more proactive approach in holding the government accountable, as well as monitoring, highlighting, and evaluating the implementation of the action plan.

5. Incorporate multiple stakeholders in the development, implementation, monitoring, and evaluation stages of the action plan. The E-Government Center and State Chancellery should discuss with relevant CSOs ways to incorporate multiple stakeholders in the development, implementation, monitoring, and evaluation stages of the action plan. Responsibility for implementing the action plan should be shared by all stakeholders, not only the E-Government Center, because open government should bring to the table public sector, civil society, business, academia, citizen groups, and media. To mainstream and improve ownership within governmental bodies, more public actors (for instance, Parliament and the Ombudsmen) gradually should be incorporated in the development stage. Eventually they should produce initiatives for the action plan and the lead government agency would supervise and monitor the action plans.

B. IRM researcher recommendations

1. Adopt a two-year action plans and produce annual self-assessment reports. The IRM researcher recommends the Moldovan Government adopt two-year OGP action plans and produce annual self-assessment reports, as required in the OGP Agreement. It is highly recommended for the OGP action plan to be comprehensive, preferably a stand-alone document, which is not part of any other sub-plans or strategies. This will increase the focus, visibility, and recognition of the action plan. It also will facilitate implementation and monitoring of the progress toward OGP principles, values, and engagements. Moldovan CSOs fully support this recommendation.

2. Use more specific commitment language and include more commitments addressing civic participation and public accountability. The IRM researcher and civil society representatives believe that the action plan should contain more specific commitment language. The IRM researcher also recommends that the next action plan include more commitments addressing civic participation and public accountability. Technology-related commitments could go hand in hand with other offline, ambitious commitments related to changes in the public sector. More emphasis could be made on building public servants capacity to adopt open government principles as part of their job and identifying champions within government.

3. Highlight OGP-related issues on the Moldova website. The IRM researcher recommends that all processes leading to the adoption of the action plans, especially individual submissions from CSOs and the proceedings of stakeholder events, be documented and published on the OGP Moldova website. They should be published within an adequate time frame for stakeholders to express their opinions, thereby ensuring full involvement of stakeholders in the decision making process.

METHODOLOGICAL NOTE

This report is based on a mixed methodological approach: desk review (public policy documents, draft laws, regulations, official websites, informational portals, OGP and NPC meeting agendas), analysis of the commitments, as well as observation of the development process of the second action plan, two stakeholder meetings, and individual interviews with representatives from government implementing agencies and CSOs.

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¹ Global Partnership for Social Accountability, <http://www.thegpsa.org/sa/>

² "Anunt de Selectare a Membrilor Consiliului National Pentru Participare," [Particip.gov.md](http://particip.gov.md), <http://bit.ly/1KY578i>

³ Please see: <http://www.cnp.md/ro/despre-cnp/prezentarea-general>