



Open Government Partnership

Independent Reporting Mechanism

Philippines

Comments Received on the Third Progress Report

To whom it may concern,

We would like to take this opportunity to provide our comments as well as additional updates on the accomplishments of the Integrity Initiative Inc. for inclusion in the IRM Mid-Term Report on the Third OGP National Action Plan, particularly on Commitment 13 (Integrity Initiative on Corporate Accountability and on the IRM's conclusion that "the level of completion of this commitment is limited."

In summary we would like to highlight the following significant developments done by the Integrity Initiative (II) and its partners that we would like the IRM to consider integrating in its assessment of Commitment 13 and eventual inclusion in its final report:

1. Work done under the Integrity for Jobs (I4J) project, committing local government units to create Integrity Circles, providing transparency and observing the implementation of projects (see attached).
2. In addition to the reported total of company signatories made up of private sector enterprises, business organizations and associations comprising the Integrity Consortium, DPWH contractors, government agencies, and academic institutions, worth highlighting also are 5,000 Certified Public Accountants who signed the Integrity Pledge upon taking their oaths as CPAs in 2015.
3. Signing of memoranda of agreements with the country's two biggest associations of certified public accountants – namely the Philippine Institute of Certified Public Accountants and the Association of Certified Public Accountants in Public Practice, as well as the Board of Accountancy (see attached) and the Presidential Commission on Good Government, and two government-accredited certifying bodies for ISO certification – SGS Philippines and TUV Rhineland.
4. Since the Department of Public Works and Highways (DPWH) issued Department Order No. 86 last 24 September 2013 requiring all their project contractors to sign their own version of the Integrity Pledge, more than eight hundred contractors have been complying with the directive on an annual basis. This yearly renewal of commitment serves as an initial mechanism for screening out contractors that are not willing to engage in ethical business with the DPWH and ensures that only compliant bidders are the ones joining the procurement process. Aside from the DPWH, other agencies that are requiring the signing of the pledge among their suppliers, business partners and/or locators are: the Department of Education, Home Development Mutual Fund (also popularly known as the Pag-IBIG Fund), Development Bank of the Philippines, the Philippine Economic Zones Authority, Subic Bay Metropolitan Authority, Clark Development Corporation, John Hay Management Corporation as well as the Board of Accountancy.
5. Work done under the Judicial Reform Initiative (JRI) spearheaded by the Financial Executives

Institute of the Philippines (FINEX) with support from 18 major organizations in collaboration with the Supreme Court (SC), the Department of Justice, and the Arangkada Project. The JRI is an advocate for an effective, swift, and efficient judicial system (inclusive of the prosecutorial agencies of government), as a critical foundation for sustainable economic growth, global competitiveness, and promotion of social justice. With its principle to champion economic rights, pursue reforms to address delays, corruption, and incompetence in the delivery of justice, and be a voice of the business sector in advocating judicial reform, JRI hosted a series of discussions/dialogues between the courts and the business sector, titled "Investing in Judicial Reform Series", following a multi-organization forum with Chief Justice Maria Lourdes P.A. Sereno last March 26, 2015 on the SC priority reform areas as follows: Speedy Trial, Decongestion and Remedial Law Issues with Justice Diosdado Peralta on July 3, 2015 and Commercial Courts and Transactional Cases with Justice Estela Perlas-Bernabe on November 5, 2015.

6. II was also able to conduct a number of forums in 2015 hosting a good line-up of speakers that include former Secretary to the Cabinet Jose Rene Almendras, former Commission on Audit Chairperson (COA) Grace Pulido-Tan and current COA Chair Michael Aguinaldo, the Investment Ombudsman Melchor Arthur Carandang, Board of Accountancy Chairman Joel Tan Torres and Professor Robert Klitgaard of the Claremont Graduate University, a renowned expert on anti-corruption.

7. Members of II's Management Committee have also been attending the Regional Working Group on Business Integrity in ASEAN which recognizes the UN Global Compact's 10th Principle against Corruption, the UN Convention against Corruption (UNCAC) and other internationally accepted principles and norms. The Regional Working Group is taking the lead in promoting the adoption of business practices that uphold integrity and transparency, which are imperative to achieving and sustaining growth. Its current members are: the ASEAN CSR Network, Indonesia Business Links, International Chamber of Commerce – Malaysia, Singapore Compact for CSR, Vietnam Chamber of Commerce and Industry, Private Sector Collective Action Coalition against Corruption of Thailand and II. In order to achieve the Working Group's objectives, each member is committed to work with one another in three key areas, namely: Advocacy: to raise awareness and create an enabling environment for companies to say No to corruption and bribery, regardless of where they are in ASEAN; Capacity building: to support businesses and maximize their resources in fighting corruption through knowledge sharing and training; and Collective action: to strengthen the voice, impact, and credibility of business advocates for integrity through harmonized and standardized, integrity programs. Harmonized programs have the added benefit of being comparable, presenting opportunities for benchmarking and best practices adaption. Also, moving forward towards more harmonized and standardized programs can be in the long-term open opportunities for mutual recognition of integrity pledges and certification across ASEAN.

8. Partnership with CSR Philippines to collaborate on a private sector led initiative to improve voluntary tax compliance (see attached Memorandum of Agreement) which we are about to expand to include cooperation regarding the "Seal of Honesty" certification program co-developed with the Bureau of Internal Revenue.

Please find enclosed relevant documentation for your reference and consideration.

Kindly acknowledge upon receipt thereof, thank you very much.

- *Jose Cortez, Integrity Initiative*

Consolidated Matrix of Stakeholder Comments on the Independent Reporting Mechanism (IRM): The Philippines Progress Report 2015-2017

IRM REPORT SECTION	PAGE NO.	COMMENTING AGENCY/ ORGANIZATION	INPUT
Front Page	1	PH-OGP Secretariat	<p>May we suggest for the IRM re-validate the ratings given to each commitment considering the initial comments from the commitment holders below. There were also several inconsistencies observed between the executive summary and the detailed progress report for each commitment. Kindly re-check.</p> <p>It is also important to respond to those comments that ask for more clarification and additional references. As we still await feedback from other commitment holders, more comments shall be submitted to the IRM during or before the end of the public comment period.</p> <p>In the final version of the IRM report, will it include a summary matrix of comments/inputs from stakeholders, and how these comments were acted upon?</p> <p>If not, may we suggest the inclusion of the said portion in the final version of the report?</p>
		ANSA-EAP	Was the report prepared by Joy Aceron as contracted individual or as Government Watch?
		PH-OGP Secretariat	May we suggest to include a portion on acronyms, for easier reference of potential readers?
Executive Summary	2	PH-OGP Secretariat	It is important to note and clarify in the Executive Summary the timeline covered by this assessment. There have been significant milestones that were achieved from Q3 2016 to present that were not included in the write-up.
	3	ANSA-EAP	<p>(a) Did the OGP PH target to reach the "entire universe of CSOs" to merit this comparison?</p> <p>(b) Was this part of the plan of the OGP PH-- to make OGP relevant to the "everyday concerns of people"? What does that mean?</p> <p>(c) In the earlier statement, it was the "entire universe of the CSOs", then in the latter, it's the "everyday concerns of the people and CSOs". Is OGP PH being measured correctly in this evaluation report? If the evaluator found these to be the measures that OGP has set upon itself, then okay. But we need to set these parameters of the evaluation first and the proper references.</p>

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IRM REPORT SECTION	PAGE NO.	COMMENTING AGENCY/ ORGANIZATION	INPUT
Commitment Implementation	5-6	PH-OGP Secretariat	<i>Table 1. Assessment of Progress by Commitment1. On Law on Access to Information---</i> In light of the issuance of the EO 2 s. 2016 on the implementation of FOI in the executive branch, the rating should be changed to substantial. <i>2.2. On Transparent Local Government Plans and Budgets--</i> A new DILG Policy on Data Administration was released in 2016 that mandates that all documents posted by LGUs should be in open format. This can be verified with DILG. <i>6.3. CSO Participation in local poverty reduction and budget planning--</i> The Open BuB Portal (openbub.gov.ph) is regularly updated with quarterly status of BuB projects. This can be verified with DILG. <i>12.3. Report on Public-Private High Level Dialogues--</i> There was a report crafted by the Private Sector Secretariat.
Recommendations	8	ANSA-EAP	<i>Table 3. Top 5 SMART Reccomendations</i> (a) How do you measure coherence of a strategy?(b) Is this simply awareness of OGP as a name, or making OGP relevant to citizens, or making OGP impact felt? In other words, is this recommendation specific enough? Or does the evaluator just want OGP PH to use that phrase?
I. National Paticipation in OGP: <i>1.1 History of OGP Participation</i>	9-10	ANSA-EAP	(a) Is this a partnership or a contracted service? Is it done by the person in her individual capacity or representing her organization? Clarifying this for proper representation. (b) "Key informational interviews"--replace with informant?
I. National Paticipation in OGP: <i>1.2 OGP Leadership in the Philippines</i>	11	PH-OGP Secretariat	(a) There was a specific budget for the OGP Secretariat. Budget for OGP was lodged under the former RIU – OSEC. For each commitment, budget is lodged under the lead agencies. (b) The Non-Government CSO-Co Chair, Ms. Natalie Christine Jorge of BAG, was also elected, and a counterpart CSO secretariat was also established with development partner support. (c) Can IRM provide a legend for the symbols below each question? What does each symbol stand for?
	11	Budget Advocacy Group (BAG)	I suggest that the narrative on the transition must be expounded further. The CSO SteerComm members with the assistance of the OGP Secretariat made its outreach efforts to the new adminsitration that ushered in. Development partners together with the remaining members of the SteerComm ensured formal introduction and buy-in for the OGP.

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I. National Participation in OGP: <i>1.3 Institutional Participation in OGP</i>	12	Budget Advocacy Group (BAG)	I suggest to also add some narrative about CSOs formalizing structures within their ranks in the SteerComm. With the strong support of other CSO members in the Steering Committee, INCITEGov paved way for a more formal set-up within the CSOs engaging in the OGP. A broader and formal election was convened in March 3-4, 2016 to ensure a more stronger and broader constituency for OGP.
		PH-OGP Secretariat	(a) To clarify, not all commitments under the 3rd PH-OGP Plan are part of the Governance Cluster Action Plan. There are additional initiatives and targets that were proposed by non-government stakeholders (i.e. CSO targets, Integrity Initiative, High Level Dialogues). (b) The first two action plans also involved agencies outside of GGAC (i.e. .COA, DAP, PCDSPO, etc). The difference of the third action plan from the first two plans are more on the inclusion of non-government sector- proposed targets and initiatives. The previous plans did not contain CSO-led targets and initiatives.
II. National Process in the OGP: <i>2.1. Action Plan Development</i>	15	PH-OGP Secretariat	On Table 2.1. Can the IRM provide a legend for the symbols used in the diagram for better understanding of its readers?
	16, 17	Budget Advocacy Group (BAG)	(a) I suggest to use a more politically correct term other than “anti-government”. Nino Verzosa of INCITEGov shared that INCITEGov together with the other CSO SteerComm members invited other groups from varied political persuasions, including certain opposition groups but these groups were not receptive. (b) I suggest that we can mention the continued effort of the past steering committee to involve more stakeholders. An academic representation was also formalized in the steercomm thru formal elections held in the OGP Summit in March 2016.(c) " <i>On OGP is not an independent brand</i> "-- Agree.
II. National Process in the OGP: <i>2.1. Action Plan Development</i>	17	ANSA-EAP	(a) Is it correct to compare the reach of OGP consultations to this universe?(b) What does "reach" mean? Does it include both direct reach and indirect and several other layers of reach? What's the possibility that those who directly attended the consultations conveyed the message to other CSOs, and so on? Should that also be counted and factored in? Did the evaluator investigate that extent of reach?(c) Amount of available resources is also a factor.

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II. National Process in the OGP: <i>2.2. On-going Multi-stakeholders Forum</i>	18	PH-OGP Secretariat	<p>(a) This has been one of the milestone innovations of the Philippines in its approach to OGP commitment co-creation. Recognizing the role of civil society as active partners in implementing several OGP commitments has a transformative impact in the way that government has perceived and engaged with them. For example, the Commission on Audit's active engagement with ANSA-EAP has gradually changed the behavior of the audit institution towards partnering with civil society and citizen auditors in CPA. From 3 pilot sites in the 2nd OGP Plan, they are now rolling it out on a nationwide scale. All COA regional directors now have CPA projects in their areas. It may also be good to note that because of these innovations in the PH-OGP Plan development process, the Philippine experience also contributed meaningful inputs to the crafting of the OGP Co-Creation Process Guidance note.</p> <p>(b) We disagree with this finding. In the crafting of the third action plan, the stakeholders were never limited to the framework and initiatives under the Governance Cluster. Testament to this is the inclusion of KC-NCDDP, Integrity Initiative and the Public and Private Sector High Level Dialogues in the 2015-2017 list of OGP commitments. These initiatives are not part of the Gov Cluster Plan 2013-2016. The stakeholders just needed to propose a commitment and ensure that the initiative complies with the criteria agreed upon at the time of crafting.</p>
II. National Process in the OGP: <i>2.4. Follow-up on Previous Recommendations</i>	19, 20	PH-OGP Secretariat	<p>(a) Contrary to this, on September 2016 (before the IRM review process commenced), a letter of invitation to be part of the OGP SteerCom was sent to HoR and Senate. The letter was signed by Sec. Diokno. The PH-OGP Secretariat can provide the IRM researcher a copy of the said documents.</p> <p>(b) The findings of the IRM report have been routed to implementing agencies, PH-OGP Steering Committee members and was part of the discussions and presentations during Steering Committee meetings and other OGP events.</p>
III. Analysis of Action Plan Contents: <i>General Overview of the Commitments</i>	23	PH-OGP Secretariat	Please double check commitment numbering. In the more detailed narrative per commitment below, Commitment 7 was on Community participation in local development planning (for KC-NCDDP).
Commitment 1. Law on Access to	24	PH-OGP Secretariat	In light of the issuance of the EO 2 s. 2016 on the implementation of FOI in the executive branch, shouldn't this rating be changed to substantial?

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Information	25-26	Presidential Communications Operations Office (PCOO)	<p><i>On Early Results</i>--[Suggested additional input from PCOO].."To support this, the Office of the President has released the Inventory of Exceptions to the right to access of information signed by the Executive Secretary on 24 November 2016. As the lead implementing agency for the FOI program, the Presidential Communications Operations Office (PCOO) published two manuals for FOI (the Model Agency FOI Manual and the Model People's FOI Manual) to guide agencies and citizens in their FOI requests. Government agencies under the Executive Branch were also tasked to submit their own manuals as well to incorporate their internal information processes. As of 28 March 2017, 174 agencies have submitted their manuals. Moreover, on November 25, 2016, the PCOO launched a central platform for accessing government information via www.foi.gov.ph. It is a portal for citizens to request information from select pilot government agencies. As of 28 March 2017, 64 government agencies have already joined the portal. PCOO targets to onboard all agencies under the Executive Branch by end of 2017."</p>
Commitment 2. Transparency of Local Government Plan and Budgets	27	PH-OGP Secretariat	<p>(a) Increase in LGU compliance with FDP should merit a higher rating on potential impact as it aims to normalize transparency and openness behavior among local governments. (b) For FY 2017 all documents posted by LGUs are now in open format. This can be verified with DILG.</p>
Commitment 3. Open Data	31, 32	Department of Information and Communications Technology (DICT)	<p>(a) <i>On Completion of Open Data for 5 Government Agencies</i>--Open Data Teams for: DOJ: https://drive.google.com/open?id=0B_f1h584QS9qMTlrNWRfOGpRREU DOTC: https://drive.google.com/open?id=0B_f1h584QS9qclBueHU3STISdDQ NAPC: https://drive.google.com/open?id=0B_f1h584QS9qeVhVUDIWWHdyWmc There are 36 instead of 12 agencies which provided data to ODPH. (b) <i>On Next Steps</i>--Recommendation is not clear.</p>
Commitment 4. Extractive Industries Transparency Initiative	35, 38	Bantay Kita (BK)	<p>(a) <i>On Responsible Institutions</i>--DOF is the lead agency and houses the PH-EITI Secretariat. The rest of the agencies mentioned along with the non-government organization and industry associations are members of the Multi-Stakeholder Group which governs EITI implementation in the country. (b) <i>On Context and objectives</i>--Wondering what specific reforms were adopted by MGB and NCIP?</p>

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Commitment 4. Extractive Industries Transparency Initiative	34-38	Department of Finance-PH EITI	<p>(a) Can this still be modified? We suggest adding the wording inserted for your consideration:</p> <p>"The Extractive Industries Transparency Initiative (EITI) is a global standard for improving transparency and accountability in the oil, gas and mining sectors. EITI implementation has two core components:</p> <ul style="list-style-type: none"> • Transparency: oil, gas and mining companies disclose information about their operations, including payments to the government, and the government discloses its receipts and other relevant information on the industry. The figures are reconciled by an Independent Administrator, and published annually alongside other information about the extractive industries in accordance with the EITI Standard. • Accountability: a multi-stakeholder group (MSG) with representatives from government, companies and civil society is established to oversee the process and communicate the findings of the EITI reporting, and promote the integration of EITI into broader transparency efforts in the country. <p>The requirements for implementing countries are set out in the EITI Standard. Additional information is available via www.eiti.org.</p> <p>The Philippines was admitted as a candidate country by the EITI International Board on May 22, 2013. Pursuant to the requirement of the 2013 EITI Standard, and after consultation with stakeholders, the Philippine MSG formulated the following objectives for EITI implementation that are linked to EITI principles and reflective of national priorities for the extractive industries:</p> <ol style="list-style-type: none"> 1. Show direct and indirect contribution of extractives to the economy 2. Improve public understanding of the management of natural resources and public availability of data 3. Strengthen national resource management / strengthen government systems 4. Create opportunities for dialogue and constructive engagement in natural resource management in order to build trust and reduce conflict among stakeholders 5. Pursue and strengthen the extractive sector's contribution to sustainable development <p>The legal basis for EITI implementation in the country is found in Section 14 of Executive Order No. 79 (2012), which states the Philippines' commitment to participate in the EITI. Thereafter, Executive Order No. 147 (2013) was issued, formally creating the Philippine EITI. "</p>

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			<p>[insert] "The EITI process in the Philippines is governed by the MSG composed of representatives from the government, namely the Department of Finance (MSG Chair and host to the PH-EITI Secretariat), Department of Environment and Natural Resources – Mines and Geosciences Bureau, Department of Energy, Department of the Interior and Local Government, and Union of Local Authorities of the Philippines. The civil society is mainly represented by Bantay Kita Philippines, a broad coalition of civil society organizations advocating transparency and accountability. The extractive industries are represented by the Petroleum Association of the Philippines, the Chamber of Mines Philippines, and an elected representative from non-Chamber companies. "</p>
			<p><i>(b) On Potential Impact</i>--If the criterion is potential impact, the EITI reports should register moderate to transformative rating, because the reports contain the comprehensive information and data on extractives, and they are published and actively communicated to stakeholders. As such, they are the main vehicle for transparency within the EITI framework. Experience, even as of June 2016 only, would show how EITI reports (and the IEC materials drawn from them) have impacted local or subnational stakeholders and led to policy reforms within the relevant government agencies (DBM, DOF-BLGF).</p> <p><i>(c) On OGP Value and relevance</i>--The EITI validation process evaluates how effectively a candidate country like the Philippines have implemented the EITI against the EITI Standard. The process entails broad consultations with stakeholders and a public and open invitation to participate by sending inputs to identified addressees (an international mission team), thereby civic participation and public accountability are involved.</p> <p><i>(d) On Specificity</i>--Bantay Kita may be in a better position to comment on this item, but from the point of view of the PH-EITI secretariat, the CSO constituency of the Multi-stakeholder Group (MSG) is the most active of the three sectors represented in the body. Perhaps Bantay Kita can supply more specific information about CSO participation in EITI.</p> <p><i>(d) On Context and objectives, 2nd paragraph: "convenings"</i>--Not sure what this means.</p> <p><i>(e) On Completion</i>--Please see example of capacity-building activity inserted in the paragraph.</p> <p><i>(f) On Early results</i>--I'm not sure which document this is referring to. Perhaps the EITI Annual Progress Report? Or is this Bantay Kita's input?</p>
	38	PH-OGP Secretariat	<p>According to the Midterm Self-Assessment Report, Bantay Kita was able to conduct 23 capacity building activities sessions on utilizing EITI data in 2015. An additional 2 subnational capacity building sessions were also conducted by June 2016.</p>

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Commitment 5. CSO Engagement in Public Audit	41	COA	<p><i>On the criterion “Specificity”</i></p> <ol style="list-style-type: none"> 1. What is the context or definition of “Specificity” as a criterion? 2. From the write-up, it appears that “specificity” pertains to: 1st, how the objective is stated. What are the measures/indicators for this criterion? <p>From the write-up, it appears that “specificity” also pertains to: 2nd, how the descriptions of deliverables are stated.</p> <ul style="list-style-type: none"> • <i>The write-up states that the deliverables are measurable but the “commitment language does not specify exactly which policies are intended to support the CPA”. Should the description of the deliverables describe exactly what the policies should be? The determination of the format of the policy itself (e.g. COA Resolution) for the purpose of institutionalization & mainstreaming is to be done during policy formulation since it will cover the entire gamut of experiences during the pilot phase.</i> • <i>As regards the commitment “5 CSO/private sector capacity building activities”, the write-up states that “the deliverable is vague: there have been numerous CPA capacity-building activities and it is not clear which five would be accounted for under the OGP commitment”. It is not possible to identify at the commitment stage what type of capacity building activities will the CSOs need since this identification happens during the exploratory meetings.</i> • <i>On the commitment “25 CSOs trained and deployed as citizen auditors”, the write-up states that “the deliverable is vague” as “it is unclear whether the 25-citizen auditors target refers to the organizations or individual representatives of CSOs”. “Citizen auditors”, as the term connotes, cannot be organizations but individuals since they become members of specific CPA Teams</i> <ol style="list-style-type: none"> 3. Item 5.2. 2 CPA activities 2015 – 2017 is not one of the commitments. Why is there a rating (MINOR) for this? 4. Why is the rating for 5.3. 5 CSO/private sector capacity building activities LOW? 5. Why are the ratings for 5.1. Adopt CPA support policies and 5.4. CSO citizen auditors (should read: “CSOS trained and deployed as citizen auditors”) MEDIUM? 6. Where are the commitments “3 new CPA reports published and uploaded on the COA website” / “3 audit reports published”? 7. If the assessment is on how the objectives and deliverables are described or stated, the instructions on how to accomplish the commitment form should have been very clear (with examples) about these from the very beginning.

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	41	COA	<p>On the criterion “OGP value relevance”</p> <ol style="list-style-type: none"> 1. What is the context or definition of ““OGP value relevance” as a criterion? 2. What are the measures for this criterion? 3. Why is there no rating for “Access to information”? Does publication of CPA reports in the COA website not provide general public access to information? 4. The development of CPA support policies involved CSOs. This should merit a “√” rating. 5. The CPA activities availed of technology -- geotagging for field data collection in the audit of farm-to-market roads, the use of the Geostore (software) for storage and analysis of geotagged data and data analytics and visualization on the audit results. This should merit a “√” rating. <p>On Completion:</p> <ol style="list-style-type: none"> 1. COA: What is the context or definition of “Completion” as a criterion? 2. What are the measures/indicators for this criterion?

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Commitment 5. CSO Engagement in Public Audit	41	COA	<p>On the “Context and objectives”</p> <ol style="list-style-type: none"> 1. Please also refer to the comments on Specificity above. 2. On the last paragraph: <ol style="list-style-type: none"> a. What are the objectives of the assessment, the results of which appear to be as indicated in this paragraph? What methodology was adopted in the assessment? Given the many citations, it seems that there was actually no assessment conducted. The writer simply picked up opinions from various literature reviewed. b. What impact does the researcher expect and what is the basis for selecting it? What are the indicators/measures of the impact? How were the data for assessing CPA against these indicators/measures of impact gathered and analyzed? c. It is emphasized that up to the year 2016, the CPA was still at the “expansion of the pilot audits” phase. Thus, the COA does not as yet expect to attain the impact, or ultimate effect of the CPA as a reform strategy for enhanced transparency and accountability although there are already signs of such enhancements: direct involvement of citizens in the public audit process made the said process transparent to the public; auditees whose projects have been audited using the CPA technique have been more receptive of audit recommendations, i.e., the implementation of CPA recommendations were more immediate than those in the COA audits that did not use CPA. d. The statement “The effectiveness of CPA in generating response and holding power to account has yet to be established, which could make this initiative transformative if sustained and scaled up.” is merely speculative. e. The statement “The prospect of <u>sustainability and scaling up remain dim</u> because the undertakings/activities of CSOs remain donor-dependent” is not based on real data. The researcher should have obtained data from the COA. Even at the pilot stage, the CPA has already been provided with appropriation in the National Budget. Donor assistance were volunteered; but, the COA’s counterpart resources were more than the donations. f. The statement “COA is already providing resources to cover direct costs of citizen auditors, but this is insufficient to cover intermediary CSO work, such as mobilization, coordination, and capacity building of volunteers from participating CSOs and processing and analysis of results.” is vague. The CPA does not intend to provide resources for intermediary CSO work. CSOs who obtain this kind of support are those who are used as conduits by development partners of technical assistance to the COA, as a sort of “management fee”. Resource requirements for capacity building and processing and analysis of results of audits are provided by the COA as direct expenses for audits and related activities. g. What does the statement “The earlier reports accounted for preparatory activities such as setting up of

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			<p>management unit in COA and mobilization of CSOs, conduct of auditing and release of audit reports.” mean? Why are these activities categorized as preparatory work? What is the basis for such categorization?</p> <p>h. What are the bases for the conclusion that the potential impact of the deliverables under the third action plan for this commitment is “Minor”? What is the expected potential impact against which the CPA is being assessed?</p> <ul style="list-style-type: none"> • It is emphasized that up to the year 2016, the CPA was still at the “expansion of the pilot audits” phase. Thus, the COA does not as yet expect to attain the impact, or ultimate effect of the CPA as a reform strategy. <p>i. What are the bases for the conclusion that “<u>steps towards sustainability and scalability remain pending</u>”? The creation of a permanent Project Management Unit to manage all efforts on the CPA, to replace the ad-hoc CPA Project Management Team, is a step towards sustainability. The inclusion of the CPA in the regular budget in the General Appropriations Act is also a step towards sustainability. Even at its pilot phase involving expansion of the CPA from a pilot audit of one agency (e.g. CPA of Solid Waste Management of Quezon City) to pilot audits on the same audit focus covering more agencies (e.g. CPA of solid waste management covering all the cities and municipality of Metro Manila), the COA has already started scaling up the CPA.</p> <p>3. What does “enabling COA to cover for projects” mean?</p> <p>4. What does “looking beyond the technical” mean?</p>

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Commitment 5. CSO Engagement in Public Audit	42	COA	<p>1. The standards for the assessment are the commitments which are:</p> <table border="1"> <thead> <tr> <th data-bbox="1041 318 1547 354">Commitments (Revised)</th> <th data-bbox="1547 318 1866 354">Accomplishments</th> <th data-bbox="1866 318 2105 354">Assessment</th> </tr> <tr> <td data-bbox="1041 354 1547 386">In 2015:</td> <td data-bbox="1547 354 1866 386">For July – Dec 2015</td> <td data-bbox="1866 354 2105 386"></td> </tr> <tr> <td data-bbox="1041 386 1547 418">1. CPA is institutionalized in COA</td> <td data-bbox="1547 386 1866 418"></td> <td data-bbox="1866 386 2105 418"></td> </tr> <tr> <td data-bbox="1041 418 1547 493"> <ul style="list-style-type: none"> • Policies to support CPA are in place by 2016 </td> <td data-bbox="1547 418 1866 493">On-going</td> <td data-bbox="1866 418 2105 493"></td> </tr> <tr> <td data-bbox="1041 493 1547 626"> <ul style="list-style-type: none"> • At least 2 CPA activities conducted (audit focus to be determined each year) </td> <td data-bbox="1547 493 1866 626">6</td> <td data-bbox="1866 493 2105 626">Accomplishments exceeded the commitment by 200%</td> </tr> <tr> <td data-bbox="1041 626 1547 760"> <ul style="list-style-type: none"> • At least 1 capacity building activity on CPA conducted for the civil society and the private sector </td> <td data-bbox="1547 626 1866 760">6</td> <td data-bbox="1866 626 2105 760">Accomplishments exceeded the commitment by 500%</td> </tr> <tr> <td data-bbox="1041 760 1547 834">2. CSO participation in COA sustained in CPA</td> <td data-bbox="1547 760 1866 834"></td> <td data-bbox="1866 760 2105 834"></td> </tr> <tr> <td data-bbox="1041 834 1547 967"> <ul style="list-style-type: none"> • At least 1 CSO represented in the conduct of CPA activities </td> <td data-bbox="1547 834 1866 967">3</td> <td data-bbox="1866 834 2105 967">Accomplishments exceeded the commitment by 200%</td> </tr> <tr> <td data-bbox="1041 967 1547 1101"> <ul style="list-style-type: none"> • At least 5 CSO and private sector volunteers are trained in CPA </td> <td data-bbox="1547 967 1866 1101">6</td> <td data-bbox="1866 967 2105 1101">Accomplishments exceeded the commitment by 20%</td> </tr> <tr> <td data-bbox="1041 1101 1547 1305"> <ul style="list-style-type: none"> • CSO recommendations are included in CPA Reports </td> <td data-bbox="1547 1101 1866 1305">Citizen-auditors work with organic COA auditors as a Team. Hence, they develop audit recommendations together as a Team.</td> <td data-bbox="1866 1101 2105 1305">Accomplished</td> </tr> <tr> <td data-bbox="1041 1305 1547 1370">3. Citizens have unfettered access to CPA reports</td> <td data-bbox="1547 1305 1866 1370"></td> <td data-bbox="1866 1305 2105 1370"></td> </tr> <tr> <td data-bbox="1041 1370 1547 1440"> <ul style="list-style-type: none"> • All CPA Reports are published and uploaded on the COA website </td> <td data-bbox="1547 1370 1866 1440">1 completed CPA Report but not yet</td> <td data-bbox="1866 1370 2105 1440">Not accomplished</td> </tr> </thead></table>	Commitments (Revised)	Accomplishments	Assessment	In 2015:	For July – Dec 2015		1. CPA is institutionalized in COA			<ul style="list-style-type: none"> • Policies to support CPA are in place by 2016 	On-going		<ul style="list-style-type: none"> • At least 2 CPA activities conducted (audit focus to be determined each year) 	6	Accomplishments exceeded the commitment by 200%	<ul style="list-style-type: none"> • At least 1 capacity building activity on CPA conducted for the civil society and the private sector 	6	Accomplishments exceeded the commitment by 500%	2. CSO participation in COA sustained in CPA			<ul style="list-style-type: none"> • At least 1 CSO represented in the conduct of CPA activities 	3	Accomplishments exceeded the commitment by 200%	<ul style="list-style-type: none"> • At least 5 CSO and private sector volunteers are trained in CPA 	6	Accomplishments exceeded the commitment by 20%	<ul style="list-style-type: none"> • CSO recommendations are included in CPA Reports 	Citizen-auditors work with organic COA auditors as a Team. Hence, they develop audit recommendations together as a Team.	Accomplished	3. Citizens have unfettered access to CPA reports			<ul style="list-style-type: none"> • All CPA Reports are published and uploaded on the COA website 	1 completed CPA Report but not yet	Not accomplished
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			<ul style="list-style-type: none"> All CPA Reports are easily downloaded from the COA website 	- Not applicable -	- Not applicable -
			In 2016:	January – March 2016	
			4. CPA is institutionalized in COA		
			<ul style="list-style-type: none"> Policies to support CPA are in place by 2016 	Draft COA Resolution institutionalizing the CPA submitted to the COA Commission Proper for consideration	Partially completed
			<ul style="list-style-type: none"> At least 2 CPA activities conducted (audit focus to be determined each year) 	18	Accomplishments exceeded the commitment by 800%
			<ul style="list-style-type: none"> At least 1 capacity building activity on CPA conducted for the civil society and the private sector 	18	Accomplishments exceeded the commitment by 850%
			5. CSO participation in COA sustained in CPA		
			<ul style="list-style-type: none"> At least 1 CSO represented in the conduct of CPA activities 		
			<ul style="list-style-type: none"> At least 5 CSO and private sector volunteers are trained in CPA 	250	
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	41-42	ANSA-EAP	<p>(a) If there are "numerous capacity building activities", doesn't that mean that the target was exceeded? With due diligence, the evaluator should have identified which of the numerous capbuild activities correspond to the five in the OGP commitment. Then, it's not vague anymore.(b) This can be easily verified with COA or ANSA. Is it not the job of the evaluator to do proper verification?(c) When agency auditee opens up to audit, that's already response. The changes that auditees implemented based on audit findings are also responses. That's the way CPA holds power to account.(d) CPA has been scaled nationwide, e.g., FMR, Barangay Health Stations</p>
Commitment 6. CSO Participation in Local Poverty Reduction Budget Planning	45-46	PH-OGP Secretariat	<p>(a)The Open BuB portal (openbub.gov.ph) is regularly updated with quarterly status of BuB projects. This can be confirmed with DILG. (b) On Context and Objectives--The constitution and the Local Government Code provides CSO participation in local planning and budgeting. However, implementation of such policies remain weak. (c) On Next Steps--Contrary to this, ADM shall engage CSOs as third party monitors of all ADM projects. Capacity-building for CSOs participating in the program will also be put in place.</p>

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Commitment 7. Community Participation in Local Development Planning	47, 50	Department of Social Welfare and Development (DSWD)	<p><i>(a) On Commitment Text</i>--Misplaced text. This is on the ARTA program.</p> <p><i>(b) On Context and Objectives</i>--For reference: KC-NCDDP's Program Development Objective is "communities in target municipalities empowered to achieve improved access to basic services and participate in more inclusive local planning, budgeting, implementation, and disaster risk reduction and management".</p> <p><i>(c) On Completion</i>--[i] Except for the community subprojects completed as of June 2016 (should be 4,939, not 5,354), data is fine;</p> <p>[ii] Overall target coverage of KC-NCDDP is 847 municipalities. Am not sure how exactly the accomplishment was stated in the source document but perhaps they only reported on areas specifically funded by ADB. Suggesting to remove the "826 target" as it might be cause for confusion.</p> <p>[iii] Paragraph 1, 2nd Sentence: Suggesting to replace "because of" with either of these terms: facilitated, enabled, or formalized.</p> <p>[iv] Paragraph 2: [insert]" ...achievement of targets does not usually come early in the year because of the phased and sequential implementation of KC-NCDDP, which goes along the stages of the Community Empowerment Activity Cycle. One cycle typically spans 12 months, but does not necessarily start at the beginning of the year, nor are all municipalities synchronized in their implementation."</p> <p>[v] Paragraph 2, last sentence: For our own understanding/levelling-off, what is the IRM researcher referring to here? If this IRM report covered progress until two months before 2016 ended, accomplishment for all indicators was already above 70% as of Sept, and above 90% as of Dec 2016.</p> <p>[vi] Same comment on the period covered for the IRM Report. Accomplishment for all indicators were already above 70% as of September, and above 90% as of December 2016.</p>
	50	PH-OGP Secretariat	<p>This whole paragraph seems to be misplaced.</p> <p>Contrary to this, the overall summary table for this commitment as well as the executive summary marks KC-NCDDP completion as substantial and NOT limited.</p>

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Commitment 8. Feedback Mechanism to Improve Public Delivery Service	53	Civil Service Commission (CSC)	<p><i>(a) On Context and objectives</i>--That government's service offices will obtain the CSC-SEA. While five percent of service offices surveyed in 2014 earned the award, more stringent criteria was set for 2015 onwards, thus, 2015 was used as baseline. "Acted upon" means the CCB has taken appropriate action on a concern lodged by the public. Simple queries on government services, requirements and procedures that are included in the Citizen's Charter of a particular agency are directly responded to by the CCB agents. While those that require action/decision from other government agencies are referred to them for appropriate action. While CCB has commitment on the rate of acted upon concerns, it also makes sure that referred matters to agencies are responded to by regularly monitoring the response and resolution of concerns made by other agencies and providing feedback to the client. Quarterly follow-up are also done on referrals without response/action from the agencies.</p>
	52-55	CSC	<p><i>(a) On Context and objectives</i>--That government's service offices will obtain the CSC-SEA. While five percent of service offices surveyed in 2014 earned the award, more stringent criteria was set for 2015 onwards, thus, 2015 was used as baseline.</p> <p>"Acted upon" means the CCB has taken appropriate action on a concern lodged by the public. Simple queries on government services, requirements and procedures that are included in the Citizen's Charter of a particular agency are directly responded to by the CCB agents. While those that require action/decision from other government agencies are referred to them for appropriate action.</p> <p>While CCB has commitment on the rate of acted upon concerns, it also makes sure that referred matters to agencies are responded to by regularly monitoring the response and resolution of concerns made by other agencies and providing feedback to the client. Quarterly follow-up are also done on referrals without response/action from the agencies.</p> <p><i>(b) On Completion</i>--There were 1114 service offices surveyed in 2015. 338 garnered excellent mark; 55 or 16% of the 338 were conferred the CSC-SEA. In 2016, 1109 service offices were surveyed with 140 services offices garnering excellent rating, 94 of the 140 excellent offices passed the 1st phase validation and will be subjected to the second phase in the 1st semester of 2017.</p>

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			<p><i>(c) On early Results--</i> [insert]"...In his inaugural address as the 16th President of the Republic of the Philippines and his State of the Nation Address on June 30, 2016 and July 25, 2016, respectively, President Rodrigo Roa Duterte announced the creation of a citizens' hotline for reporting corruption and complaints on government service. Subsequently, the Office of the Cabinet Secretary requested the CSC to allow calls to the President's Hotline be temporarily directed to the CCB facility until such time that a facility for the hotline is established. Thus, in support to the request, the CCB facility has been operating 24/7, 3-shift since August 1, 2016. For 2016, the number of transactions significantly increased, with recorded 106,839 transactions from January to December 2016. There were 903 commendations, while resolution rate was 79.03% as of end of December 2016."</p>
Commitment 10. Improve Ease of Doing Business	60, 61	National Competitiveness Council (NCC)	<p><i>(a) On Commitment Text--</i>First, Is it possible to include in the EODB supporting institutions the members of the whole of AO 38 Taskforce? (i.e., SEC, BIR, the social agencies, etc.) and also an overview of the AO 38? (http://www.gov.ph/2013/05/17/administrative-order-no-38-s-2013/). We think that this is an important information to contextualize the effort of both public and private sector to improve our competitiveness rankings.<i>(b) On Completion--</i>Can this be rephrased as follows:The unpredictable changes in the survey methodology, lack of public awareness to the reform initiatives, and lack of commitment and support from a few agencies were some of the reasons given why the target was not achieved.</p>
Commitment 11. Local Government Competitiveness	63	PH-OGP Secretariat	What does this mean? Table 1.1 Improving LGU Competitiveness
Commitment 12. Public-Private Sector Dialogue on Inclusive Growth	66	Philippine Business Council-Joint Foreign Chambers (PBG-JFC)	The insights we shared to Ms. Aceron were incorporated in this report; however, we feel the report should strongly stress the importance of government cooperating in the conduct of the public-private dialogues on national and economic issues as this provides a venue to discuss matters on Ease of Doing Business, and steps being undertaken to improve the country's business environment; thereby promoting transparency, accountability, and inclusiveness in policy- and program direction.

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Commitment 13. Integrity Initiative on Corporate Accountability	70, 71	Government Procurement Policy Board (GPPB)	<p><i>(a) On Completion</i>--Perhaps we can be considered as substantially compliant with the requirement of incorporating the parameters of Integrity Initiative in the Procurement Requirements when the Omnibus Sworn Statement was revised by the GPPB in its Resolution No. 22-2013 to include the following:(Section h) It did not give or pay, directly or indirectly, any commission, amount, fee, or any form of consideration, pecuniary or otherwise, to any person or official, personnel or representative of the government in relation to any procurement project or activity. In addition, the 2016 revised IRR of RA 9184 now requires the bidders participating in Small Value Procurement and Emergency Negotiated Procurements to submit this Omnibus Sworn Statement. These revisions in the IRR were made to simplify further the requirements of the bidding. To require the bidders to submit additional requirement such as the Certification on Integrity Pledge would not only be an additional burden to the bidders due to the fact that they would have to undergo the process and pay the necessary fees to obtain the certificate but likewise, it would cause a difficulty on the Procuring Entity in the validation of the certificate submitted during the post-qualification stage which could further prolong the bidding as its BAC would have to ascertain that the Bidder has not violated any of its integrity pledge/commitment. We also have to consider the number of SMEs joining government biddings if they are willing to be certified and to cover the additional cost for them to join the bidding. The GPPB through several procurement reform initiatives, the latest being the issuance of the 2016 Revised IRR on August 2016, addressed several challenges in government acquisition, among which is to trim down documentary requirements to minimize ineligibilities, failures of bidding and additional cost to bidders. The GPPB through several procurement reform initiatives, the latest being the issuance of the 2016 Revised IRR on August 2016, addressed several challenges in government acquisition, among which is to trim down documentary requirements to minimize ineligibilities, failures of bidding and additional cost to bidders. It is good to note that the import and substance of the "Integrity Pledge" has already been incorporated in the required Omnibus Sworn Statement that forms part and parcel of the Technical Proposal to be submitted by bidders. This initiative falls within the substantial scope of the "Integrity Pledge".</p>
Country Context	74	DSWD	<p>This statement isn't so clear. But indeed, the Municipal Talakayan provides a venue for democratic dialogue among citizens, LGUs, and other key stakeholders to discuss the local development condition in their municipality. It highlights the utilization of available local data and statistics to measure collective accomplishment and detect remaining development needs. Much of the preparatory work involves data gathering, which has heightened participants' awareness on the need for comprehensive and accurate information on sectoral/cross-sectoral concerns.</p>