Independent Reporting Mechanism (IRM): Liberia Design Report 2017–2019

This report was prepared in collaboration with Diasmer Panna Bloe, Independent Researcher.

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Executive Summary: Liberia

Liberia's third action plan aimed to address corruption through more access to information and citizen oversight. The IRM recommends that future co-creation processes include tools and mechanisms to inform the public how their feedback is used, and consultations are more inclusive. While the action plan did include ambitious commitments, it was impacted by lack of funding and a political transition.

The Open Government Partnership (OGP) a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. The Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Liberia joined OGP in 2012. Since, Liberia has implemented 2 action plans. This report evaluates the design of Liberia's 3rd action plan.

Table 1. At a glance
Participating since: 2012
Action plan under review: Third
Report type: Design
Number of commitments: 10

Action plan development

Is there a Multistakeholder forum: Yes
Level of public influence: Consult
Acted contrary to OGP process: No

Action plan design

Commitments relevant to OGP values: 10 (100%)
Transformative commitments: 2 (20%)
Potentially starred: 2 (20%))

Action plan implementation

Starred commitments: *N/A*
Completed commitments: *N/A*
Commitments with Major DIOG*: *N/A*
Commitments with Outstanding DIOG*: *N/A*

*DIOG: Did it Open Government

General overview of action plan

Liberia's third action plan includes initiatives that build from its second NAP and aim to strengthen government practices that address the historically relevant issue of corruption, with some opportunities for civic engagement. The plan's design, however, could not clearly establish a connection between its initiatives and the pressing economic issues that worsened in recent years. This could have been an important opportunity to increase political support to the OGP agenda, especially considering the government transition.

The co-creation process, led by the Multistakeholder Forum, was impacted by lack of funding and the electoral process. Civil society organizations –mostly those headquartered in Monrovia- took part in the different stages of the process, four of them as members of the MSF. Opportunities for remote participation were limited, as the forum created by the Accountability Lab could not be put online due to budget constraints. In addition, the last round of consultations in Grand Gedeh was cancelled due to road conditions and the start of the political campaign.

Closing the feedback loop continues to be an area of opportunity, as the government has not established the necessary mechanisms or tools –such an online repository- to explain how it has included CSO/citizen input in its decision to adopt commitments.

Ten initiatives make up Liberia's third action plan, six of them were transitioned from the previous action plan. Only two commitments reach a transformative level of ambition, one related to the adoption of the Open Contracting Standard and one that aims to approve whistleblower protection regulations.

Table 2. Noteworthy commitments

Commitment description	Moving forward	Status at the end of implementation cycle.
I. Develop a legislative monitoring database *Track laws and bills within the legislature, provide regular reports on their status and allow for discussion.*	*This commitment needs to gain legislative buy-in to guarantee access to the required information and processes for its implementation. CSOs and the general public could be given access to draft legislation so that citizen input can be considered from the beginning of the process.*	*Forthcoming: this will be assessed in the Implementation Report, after the end of the action plan cycle.*
IV. Citizen monitoring and support of the Justice System *Raise awareness around the roles of juries; allow citizens to monitor local courts and track cases.*	*More specificity in relation to its activities and goals could benefit this commitment's potential impact. Its open justice component could consider adapting different types of tools –online and offline- to promote participation from citizens according to resource availability (computers, internet, etc).*	*Forthcoming: this will be assessed in the Implementation Report, after the end of the action plan cycle.*
V. Feedback mechanism for the LNP *Establish tools and information dissemination modalities to build trust in the police.*	*To ensure this commitment's effectiveness, a fair and efficient grievance redress mechanism needs to be adopted to respond to complaints on abuses by the LNP. At the same time, a public campaign could be put in place to recognize those officers that have been commended for their performance.*	*Forthcoming: this will be assessed in the Implementation Report, after the end of the action plan cycle.*
VI. Legislation and capacity building for integrity *Support the passage of laws that ensure public servants' integrity and accountability; development of capacity and develop a network of honest officials.*	*Once legislation is passed, the government needs to focus on operationalizing disclosure requirements within the Code of Conduct, including income, assets, liabilities, etc. In addition, the necessary enforcement mechanisms need to be put in place.*	*Forthcoming: this will be assessed in the Implementation Report, after the end of the action plan cycle.*
VIII. Open Contracting *Adopt international standards of Open Contracting to improve accountability, value for money and oversight.*	*Relevant actors, such as the National Investment Commission and the National Bureau of Concessions, need to commit to the adoption and implementation of the standards, to ensure consistency in this area of government practice. Effectiveness of public monitoring processes can be assessed to identify any possible gaps.*	*Forthcoming: this will be assessed in the Implementation Report, after the end of the action plan cycle.*

Recommendations

The IRM recommendations aim to inform the development of the next action plan and guide implementation of the current action plan.

Table 3. Five KEY IRM Recommendations

1.	Map steps and stakeholders required to effectively operationalize commitments within the prevailing context and constraints.
2.	Align action plan development with budget processes and timelines, to provide opportunity for advocacy and for the GOL to allocate sufficient resources to support OGP-Liberia activities.
3.	Establish a dedicated OGP-Liberia website where information on all aspects of the national OGP process can be proactively published.
4.	Define and elaborate measurable quantitative and/or qualitative indicators under each commitment included in the action plan to facilitate monitoring, evaluation, and learning.
5.	Strengthen outreach and advocacy on OGP to encourage wider public participation and engagement in related processes.

ABOUT THE IRM

OGP's Independent Reporting Mechanism (IRM) assesses the development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

Diasmer Panna Bloe collaborated with the IRM to conduct desk research, interviews and write this report.

Open Government Partnership

I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate action in an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their own progress and determine whether actions have had made an impact on people's lives.

Liberia joined OGP in 2012. This report covers the development and design of Liberia's third action plan for 2017–2019 and its findings are meant to provide recommendations for implementation of future action plans.

The Independent Reporting Mechanism of OGP partnered with Diasmer Panna Bloe, who carried out this evaluation. The IRM aims to inform ongoing dialogue around development and implementation of future commitments. For a full description of the IRM's methodology, please visit: https://www.opengovpartnership.org/about/independent-reporting-mechanism.

II. Open Government Context in Liberia

Liberia is partner to numerous international agreements and hosts progressive domestic laws targeting anti-corruption and transparency. The 2017-2019 National Action Plan looked to operationalize and leverage these legal mandates to improve transparency, citizen participation, and accountability. As the plan was drafted before a general election and during a recession, political and economic fragility may have had an effect on its success.

Liberia is partner to numerous international agreements and hosts progressive domestic laws focusing on anti-corruption and transparency. Yet, corruption is ubiquitous in public service. After joining OGP in 2012, Liberia experienced immediate benefits, including government officials understanding their role regarding information (not to own and secure but to disseminate) and an increase in information requests.[1] In the area of transparency, Liberia became a partner to and/or legalized transparency and anti-corruption initiatives such as:

- The Act to Establish the Liberian Anti-Corruption Commission (2008),[2] which educates on, prevents, investigates, and prosecutes corruption and implements anti-corruption strategies;
- The Extractive Industries Transparency Initiative Act (2009),[3] which requires and maintains transparency over payments from extractive companies;
- The Freedom of Information Act (2010),[4] which promotes and protects the right to request and receive information;
- The International Aid Transparency Initiative (2011),[5] which promotes aid transparency and accountability; and
- The Code of Conduct Act (2014),[6] which elucidates civil service conduct, conflict of interest, and unethical behavior and penalties for violation.

Yet, operationalization and implementation remained inadequate due to limited technical capacities and political support. The Government of Liberia (GOL) has had trouble defining, planning, implementing, and monitoring its policy initiatives.[7]

Civic Participation and Civic Space

Government support of civic participation and the people's right to civic spaces is enshrined in the Constitution of Liberia (1986), which also ensures freedom of the press and the right of citizens to question their government. However, Liberians were unable to fully exercise these rights under the military rule of Samul K. Doe (1980–1990) and during the civil war years (1989–2003).

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[1] Interview of Mark B. Freeman, Independent Information Commission, 18 October 2018.
[2] TRACK – United Nations Office on Drugs and Crime. http://www.track.unodc.org/LegalLibrary/pages/LegalResources.aspx?country=Liberia
[3] Extractive Industries Transparency Initiative. https://eiti.org/document/liberia-eiti-2009-act
[4] NATLEX – International Labour Organization. http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=104012
[5] Spotlight on IATI data use – Liberia. International Aid Transparency Initiative. https://iatistandard.org/en/news/spotlight-on-iati-data-use-liberia/
[6] Code of Conduct Act 2014. Liberia Legal Information Institute. http://www.liberlii.org/cgi-bin/disp.pl/lr/legis/acts/coca2014136/coca2014136.html?stem=0&synonyms=0&query=code%20of%20conduct%202014
[7] Interview of Anderson Miamen, Center for Transparency and Accountability in Liberia, 30 October 2018. Interview of Mark B. Freeman, Independent Information Commission, 18 October 2018.

To counter this neglect, the government of Liberia (GOL) and partners deliberately include civic engagement – especially from historically underrepresented groups – in policies and programs.[8] Although civic engagement is not a legislative requirement, the Liberian policy-making process now contains regional and national stakeholder consultations in which citizens may inform and/or react to prospective policy, which aids the goal of evidence-based policy making.

The GOL also espouses support for a free press.[9] Yet its realization varies. Freedom House, an independent organization dedicated to the expansion of freedom and democracy, assigns numerical scores evaluating the legal environment for media, political pressures that influence reporting, and economic factors that affect access to news and information.[10]

In 2017, Freedom House ratings (1 = most free, 7 = least free) gave Liberia a freedom rating of 3.5/7, with political rights at 3/7, and civil liberties at 4/7.[11] Its freedom of the press score (where 0 = most free, 100 = least free) was 60/100. Overall, Liberia has "partly free" freedom of expression, association, and assembly.[12]

Accountability

There is minimal accountability for government corruption in Liberia despite the existence of the Code of Conduct Act (2014), its sanctions and civil service disciplinary actions for infringement, and the Liberia Anti-Corruption Commission's (LACC) reporting and investigative procedures. In practice, the enforcement of discipline is at the president's discretion, and proven lawbreakers are either excused, given negligible penalties, or, if dismissed, rehired in similar positions elsewhere.[13] This has resulted in some people ignoring illegal activity, with very few becoming engaged to carry out accountability measures.[14] To date, Liberia has a Corruption Perception Index rank of 122 out of 180 nations,[15] its global integrity indicators for transparency and accountability are somewhat weak (scoring 60%),[16] and 65% of adults surveyed are disappointed with lawmakers' representational functions.[17] Moreover, lawmakers increased their salaries[18] at near three hundred times the average income based on purchasing power parity,[19] and media reports and citizen experience of GOL corruption is pervasive.[20]

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[8] Interview of Lawrence Yealue, Accountability Lab, 11 October 2018.
[9] Taking steps towards democracy and free press in Liberia, 11.07.2012. Communication & Information Sector, UNESCO. http://www.unesco.org/new/en/media-services/single-view/news/taking_steps_towards_democracy_and_free_press_in_liberia/. Accessed 2019.
[10] Freedom House. https://freedomhouse.org. Accessed 2019.
[11] Liberia Profile – Freedom in the World 2017. Freedom House. https://freedomhouse.org/report/freedom-world/2017/liberia. Accessed in 2018.
[12] Liberia Profile – Freedom of the Press 2017. Freedom House. https://freedomhouse.org/report/freedom-press/2017/liberia. Accessed in 2018.
[13] Liberia: FDA, Lands & Mines Connived. 7 April 2015. The New Dawn / All Africa. https://allafrica.com/stories/201504070881.html. Accessed 2019.
[14] Interview of Interview of Anderson Miamen, Center for Transparency and Accountability in Liberia, 30 October 2018.
[15] Transparency International. Corruption perceptions index 2017. https://www.transparency.org/news/feature/corruption_perceptions_index_2017 (2018).
[16] Global Integrity Indicators. Africa Integrity Indicators – Transparency and Accountability 2017. https://aii.globalintegrity.org/scores-map?stringId=transparency_accountability&year=2017 (2018)
[17] Naymote Partners for Democratic Development. Citizens Attitudes Towards Current Lawmakers in Liberia. May 22, 2017
[18] Salaries and Allowances Lawmakers in the National Budget. Liberian Lawmakers Watch. Institute for Research and Democratic Development. Monrovia https://www.liberianlawmakerswatch.org/salaries-and-allowances-lawmakers-national-budget (2018)
[19] World Bank Open Data – Liberia. The World Bank Group. Accessed 2018.
[20] Corruption Pervasive in the Mining Sector. William Q Harmon. December 6, 2017. The Daily Observer. https://www.liberianobserver.com/news/corruption-pervasive-in-mining-sector/. Accessed 2019.

Other Considerations

Liberia completed this action plan design in 2017 – a general election year for the House of Representatives and the president. Incumbent President Ellen Johnson Sirleaf had reached Liberia's prescribed term limits, which guaranteed a new administration and possibly a new political party at the helm during the height of action plan implementation. As presidential appointment powers run three levels deep in ministries and agencies, there was risk of losing executive and institutional buy-in, knowledge, institutional capacity, and resources following the election in late 2017. Thus, participating government officials and civil society organizations (CSO) saw it as paramount to continue the previous plan's momentum, implement a viable blueprint for the next cohort of appointees, and create structures that facilitate learning, collaboration, and problem solving as required.[21]

Uncertain political transition was just one hurdle. By 2017, Liberia's economic growth had slowed—due to a recession that began in 2014 and accelerated by the Ebola virus epidemic and its initial mismanagement. When the new administration arrived in January 2018, the country was near bankrupt and lacking funds to pay civil servants, putting economic issues at the fore.[22] These economic issues include an inflation rate at 15% 1 January 2019 (reaching over 26% at year's end, 31 December 2018) and the Liberian dollar (LRD) trading at 125 to 1 USD (reaching 157 LRD to 1 USD by year's end) – a substantial economic shift compared with its 72 to 1 USD rate at the end of 2012.[23] Liberians were then experiencing the effect of inflation, stagnation and/or decreases in standards of living; a cumbersome doing-business environment, stalling of international investments; and a drawing down or exiting of development agencies, along with local jobs.

Liberia's Open Government Partnership initiative (OGP-Liberia) not only had to persuade a new administration about the importance of open governance but also had to link the benefits of open governance to alleviating Liberian's economic woes, in other words, by improving decision-making and efficiency and by reducing transaction costs to further economic growth.[24]

OGP Eligibility Criteria

Liberia maintained its OGP eligibility criteria by:

- Publishing essential budget documents;[25]
- Passing and implementing a Freedom of Information Act;[26]
- Passing and implementing asset disclosure regulation for public officials and employees as part of the Code of Conduct Act;[27]
- Engaging citizens in policy making in partnership with civil society organizations (CSOs); and
- Exercising minimal control and no repression of CSOs.

Liberia's incremental successes in its previous national action plans[28] helped make this possible. In addition, policy areas have evolved during Liberia's OGP participation with:

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[21] Interview of Lawrence Yealue, Accountability Lab, 11 October 2018.
[22] Anonymous.
[23] Liberian Dollar January 2018. XE. https://www.xe.com/currencycharts/?from=USD&to=LRD&view=10Y. Accessed in 2018.
[24] The economic benefits of Open Data. European Data Portal. 06/12/2017. https://www.europeandataportal.eu/en/highlights/economic-benefits-open-data.
[25] The Budget, Ministry of Finance and Development Planning. https://www.mfdp.gov.lr/index.php/the-budget. Accessed in 2018.
[26] Liberia: Law Implementation and Exclusion of Access. Malcolm Joseph. 23 October 2014. http://www.freedominfo.org/2014/10/liberia-law-implementation-exclusion-access/. Accessed 2019.
[27] Asset Declaration. Liberia Anti-Corruption Commission. http://lacc.gov.lr/asset-declaration/. Accessed 2019.
[28] Independent Reporting Mechanism (IRM): Liberia End-of-Term Report 2015–2017. Independent Reporting Mechanism. Open Government Partnership. 2018. https://www.opengovpartnership.org/sites/default/files/Liberia_End-of-Term_IRM-Report_2015-2017.pdf.

- Consistent work on popularizing and enabling use of the Freedom of Information Act with a website (infoLib.org.lr) launched in 2016 to manage information requests;
- Expansion of open budget initiatives with more than a 160% increase in prints of the citizens' guide to the budget;
- Improving transparency on natural resources and land rights and use with countrywide awareness-raising campaigns;
- Increasing public participation in the justice system and implementing the Jury Law with the creation of the Jury Management Office;
- Strengthening legal mandates around accountability through the push for passage of the Whistleblower Act, implementation of the Code of Conduct Act, and the formation of an OpenGov Hub[29] as part of iCampus Liberia; and
- Getting public information online in accessible formats through ministries and agencies' websites and portals.

Liberia's 2015–2017 national action plan completion of 30% was near the OGP global average of 36% completion. The 2015–2017 plan had 20 commitments, seven of which were transformative (35% compared with OGP average of 16%). At the plan's end, six commitments were completed (popularization of FOI Law, information on land reforms and national resources, implementation of the new Jury Law, civic education and engagement using offline tools, community building for accountability organizations, and improvement of integrity within government systems), including one transformative commitment (implementation of the new Jury Law) whereas an additional three were substantially implemented (information on commercial land use rights, LNP "Know Your Rights" policing campaign, and improvement of online government information). Two commitments (information on land reforms and national resources and LNP "Know Your Rights" policing campaign) had major or outstanding results in terms of "opening government." Six commitments were carried over to the next (2017–2019) national action plan forming commitments on the publication of budget documents, implementation of the FoI Act, citizen monitoring for the justice system, passing legislation and supporting capacity-building integrity in government, improving transparency in the Land Authority, and implementation and use of an open data/citizen navigation portal.[30]

The 2017–2019 national action plan built on the work of previous action plans. For the OGP value of access to information, the 2017–2019 plan proposed to continue to publish budget documents and to open the budget process for citizen participation and outlined the appointment of additional public information officers to facilitate the FoI Act. A new commitment to track laws and the legislative process through a database also adhered to OGP values. For civic participation, commitments aimed to expand citizen awareness, monitoring, and participation in the judicial process and to support capacity building for the Code of Conduct Act and passage of the Whistleblower Act. This commitment also proposed to build a platform for Liberian National Police information and citizen reporting for accountability. For public accountability, the action plan continued to support access to information and transparency in land matters. It also contained commitments to strengthen previous transparency initiatives and address gaps in the implementation of the Public Procurement and Concessions Act (2005) by instituting open contracting and a beneficial ownership registry according to international standards. Under the cross-cutting OGP value of technology and innovation for openness and accountability, commitments in the action plan continued work on developing a citizen navigation portal and collecting and readying data for appropriate access.

[29] OpenGov Hub. http://opengovhub.org. Accessed in 2018.
[30] Independent Reporting Mechanism. Liberia End-of-Term Report 2015–2017 https://www.opengovpartnership.org/report/liberia-end-of-term-report-2015-2017-year-2 (2018)

As written, the 2017–2019 action plan aimed to ease public mistrust regarding information, justice, and accountability. The scope of the action plan was adequate for Liberia's challenges in these areas. However, the plan did not fully consider positive reforms occurring in parallel that buttressed action plan activities (e.g., there were several web portals being built). It also did not address how open governance could help rectify the most pressing issue for Liberians—the economy. Ostensibly, accessible information, increased integrity in public service, and transparency in land, procurement, and asset and business ownership information should improve productivity and growth,[31] yet the connection was not explicitly made within the action plan. Making this link might improve Liberia's ability to garner political and civic support for its activities under the Open Government Partnership.

[31] How transparency can help the global economy to grow. Alex Konanykhin. 10 October 2018. World Economic Forum. https://www.weforum.org/agenda/2018/10/how-transparency-can-help-grow-the-global-economy/

III. Leadership and Multi-stakeholder Process

The multi-stakeholder process in Liberia was led by the Ministry of Information, Culture and Tourism, the national steering committee met monthly on general and thematic matters, and included GOL and CSO representatives. The process also incorporated county-based consultations. All feedback was considered and the most relevant integrated into the final action plan.

3.1 Leadership

This subsection describes the OGP leadership and institutional context for OGP in Liberia.

The Ministry of Information, Culture and Tourism (MICAT) led a national steering committee to form the action plan. This was done under the authority of the minister, out of the office of the Deputy Minister of Information, and coordinated by a focal point for drafting the action plan. Along with the two GOL staff dedicated to the OGP initiative in Liberia, the Accountability Lab Liberia acted as the lead civil society organization (CSO) and coordinated CSO participation and feedback. The Center for Transparency and Accountability in Liberia (CENTAL) was also an important resource for current and past context.

At the time of the writing this report, OGP in Liberia was not mandated through a legally binding document, and the president was not directly involved in official action plan presentations or launch. However, the Office of the President supported OGP,[32] which permitted high-level GOL and CSO participation. Executive support also enabled alignment of Liberia's and OGP's values and ambitious action plan commitments.

The steering committee drove action plan formation, similar to the previous processes. Yet this time there was no funding provided—apart from a last-minute OGP grant of USD 10,000—which led to streamlined engagements and minimal information dissemination beyond core OGP-Liberia members and their networks.[33] The lack of a permanent administrative body to support, coordinate, solve problems, and track activities hindered progress.[34] To better adhere to the OGP process, the action plan included organizational improvements such as a permanent secretariat, monthly steering committee meetings, a dedicated OGP-Liberia website as an online repository and place to disseminate responses and proposals, and a dedicated space for meetings, trainings, and workshops.

3.2 Multi-stakeholder process throughout action plan development

In 2017, OGP adopted the OGP Participation and Co-Creation Standards intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP's Articles of Governance also establish participation and co-creation requirements a country or entity must meet in its action plan development and implementation to act according to OGP process. Liberia **did not act** contrary to the OGP process.

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[32] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.
[33] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018 and interview of Lawrence Yealue, Accountability Lab, 11 October 2018.
[34] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018, interview of Ralph Jimmeh, OGP Secretariat, 11 October 2018, and interview of Lawrence Yealue, Accountability Lab, 11 October 2018.

It is worth noting, however, that at the time of the writing of this report, no evidence suggested that an online repository of the OGP process was available. Based on the IRM's findings, the GOL did not publish press updates, reports, draft commitments, or any other relevant information on the action plan formulation process in a readily accessible format or online. If not addressed, these factors would be considered triggers for the country to have acted contrary to the OGP process in future assessments.[35]

Please see Annex I for an overview of Liberia's performance implementing the Co-Creation and Participation Standards throughout action plan development.

Table [3.2]: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply to OGP.[36] This spectrum shows the potential level of public influence on the contents of the action plan. In the spirit of OGP, most countries should aspire for "collaborate."

Level of public influence		During development of action plan
Empower	The government handed decision-making power to members of the public.	
Collaborate	There was iterative dialogue AND the public helped set the agenda.	
Involve	The government gave feedback on how public inputs were considered.	
Consult	The public could give inputs.	✓
Inform	The government provided the public with information on the action plan.	
No Consultation	No consultation	

Multi-stakeholder forum

No legal mandate for the multi-stakeholder forum (MSF) in Liberia existed. However, as in previous action plans, MICAT formed an MSF consisting of steering committee members, GOL ministries and agencies, and CSOs with various policy areas, where four out of eleven

[35] Acting Contrary to Process - Country did not meet (1) "involve" during the development or "inform" during implementation of the NAP (2) government fails to collect, publish and document a repository on the national OGP website/webpage in line with IRM guidance.

OGP's Participation & Co-creation Standards were updated in 2017 to support participation and co-creation throughout all stages of the OGP cycle. The Participation & Co-creation Standards outline "basic requirements" which all OGP member countries are expected to meet, and "advanced steps" which, although not obliged to meet, countries will be supported and encouraged to do so. In this line, the Steering Committee resolved in 2017 that if a government does not meet the IAP "involve" requirement during development, or "inform" during implementation of the NAP, as assessed by the IRM, it will be considered to have acted contrary to OGP Process. Given that guidance materials were not yet published during the rollout period of this new policy, countries developing 2017-2019 action plans were given a one action plan cycle grace period.

Therefore, Liberia is not considered to have acted against the OGP process. For more information visit Section 6 of the OGP Handbook – Rules and Guidance for Participants: https://www.opengovpartnership.org/wp-content/uploads/2019/03/OGP_Handbook-Rules-Guidance-for-Participants_20190313.pdf

[36] "IAP2's Public Participation Spectrum," IAP2, 2014. http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf

members were CSO representatives.[37] The goal of the MSF was to arrange the national action plan process and, after assessment, make preliminary decisions about the structure of the plan. MSF involvement was by invitation based on formal registration (for CSOs), institutional and organizational mandate alignment with OGP themes, and a proven track record of involvement in these themes.[38] A formal procedure for participation did not exist. Participants observed, informed, and influenced decisions (see following section for details), but the MSF delegated decision-making on commitments and related activities to the implementing agency with the legal mandate and relevant CSO partners. The MSF held all meetings within the capital, Monrovia, thus limiting the involvement of CSOs to national and/or umbrella organizations with representation in Monrovia.

The MSF commenced action plan development in January 2017 and concluded in August 2017.[39] The MSF met in person approximately once a month from January to June 2017. MICAT hosted two general meetings on 25 January 2017 and 28 February 2017. Thematic meetings on transparency, accountability, and security were held on 26 April 2017; law and judiciary on 10 May 2017; finance and budget on 30 May 2017; and information and data management on 24 July 2017. These meetings set priority policy areas and likely commitments.

MICAT distributed meeting minutes and notes to the MSF though they were not available online. The Accountability Lab created an online forum to prepare and prompt CSOs and the Liberian public for conversations regarding open governance. However, the forum did not function during action planning due to limited funds and, as a result, outside stakeholder involvement was negligible.[40]

Participation and engagement throughout action plan development

MICAT, with support from Accountability Lab Liberia, facilitated action plan development and used the 2015–2017 action plan and final report as indicators of government priorities. MICAT did not explicitly delineate "rules of the game" during either plan development or subsequent public engagements. Rather, MICAT informed participants, via agendas and presentations, of timelines, stages, and decision-making processes.

At the meetings, GOL institutions suggested and discussed with the MSF possible policy topics and commitments to compose the new action plan. Relevant ministries and agencies participated except for the Liberian Business Registry. At least 14 national CSOs[41] – such as iLab, the Accountability Lab, the Center for Transparency and Accountability in Liberia (CENTAL), and the Carter Center – participated in these meetings. MICAT emailed resulting commitments to CSOs active within OGP-Liberia's network, with requests for feedback and suggestions. CSOs gave additional milestones/activities for implementing commitments that GOL representatives had chosen but did not add new commitments.[42]

Afterward, the MICAT held three public consultations within counties. MICAT recruited a minimum of five CSOs per county and included a few regional GOL representatives. At each county consultation, facilitators clarified consultations' objectives and how and when participants could inform and influence commitments and actions. In general, consultations (re)introduced the OGP and its philosophy and tasked audience members to contribute concerns that fell within the OGP framework. Facilitators relayed results to relevant line ministries and agencies and CSOs for possible inclusion in the action plan.[43]

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[37] Based on dated attendance logs provided by Jonathan Williams, Ministry of Information, Culture and Tourism.
[38] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.
[39] Based on dated attendance logs provided by Jonathan Williams, Ministry of Information, Culture and Tourism.
[40] Interview of Lawrence Yealue, Accountability Lab, 11 October 2018.
[41] Based on dated attendance logs provided by Jonathan Williams, Ministry of Information, Culture and Tourism.
[42] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.
[43] Ibid.

MICAT held the first county consultation in Montserrado County (Monrovia) on 21 July 2017 with CSO representatives from Bomi, Grand Bassa, Grant Cape Mount, Margibi, and Montserrado counties. MICAT held the second consultation in Bong County (Gbarnga) on 8 July 2017 with CSO representatives from Bong, Gbarpolu, Lofa, Nimba, and Rivercess counties. MICAT did not host the third consultation – planned in Grand Gedeh (Zwedru) targeting Grand Gedeh, Grand Kru, Maryland, River Gee and Sinoe counties – due to road conditions and the start of electioneering.[44]

The GOL did not publish press updates, reports, draft commitments, or any other relevant information on the action plan formulation process. As there is no OGP-Liberia website, MICAT distributed information by email. The MSF hoped that the efforts would gain wider recognition from articles written by members of the press present at crucial meetings.[45]

Based on feedback from CSOs, brief public awareness campaigns, and county consultations, the steering committee amended the action plan and provided it for final review, agreement, and support in a weekend workshop held on 29 August 2017. Near 50 GOL, CSO, and media representatives participated in the workshop. There, the MSF formed working groups to finalize commitments and milestones/activities. Working groups consisted of CSO and GOL members of the steering committee and external implementing ministries and agencies. Participants gave their support to the action plan. MICAT presented a definitive version of the action plan to the Cabinet and received approval on 13 September 2017.[46]

The MSF process was detailed and inclusive but, due to financial and time constraints, provided limited space for public co-creation and/or feedback. Civil society organizations were present for the formulation, vetting, and approval of commitments and believed the commitments were publicly valuable, as they aimed to address systemic gaps highlighted by participating stakeholders and reflected what Liberians wanted from their government.[47] Six out of ten commitments were transitioned from the previous action plan – matching starting priorities – and all remained ambitious. However, there were areas for further development. Some commitments lacked needed specificity even as they captured what affected the population. For example, Commitment 7 focused on improving transparency on land rights when it could have been designed to leverage OGP values to solve the pervasive, and increasingly violent, problem of land grab.[48]

Participants, especially implementing ministries and agencies, took care to ensure that commitments aligned with legal mandates and could be managed within current work plans. Verbally, participants agreed that milestones chosen must be attainable without additional funding streams, but most admitted that they proceeded with cautious optimism that resources would be allotted. The technical know-how to operationalize and achieve milestones, from both GOL and CSOs, was also assumed.

A few questioned the timing of the exercise, as there was no coordination mechanism, minimal likelihood of continuity in high-level positions, and economic stresses. Civil society organizations also observed that political will was absent and that inter-ministerial collaboration was weak. Examples given included the following:

[44] Interview of Jonathan Williams, MICAT, 11 October 2018 and Lawrence Yealue, Accountability Lab, 11 October 2018; and attendance logs provided by Jonathan Williams.
[45] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.
[46] Ibid.
[47] From interviews of CSOs conducted 11 October – 30 October 2018.
[48] Interview of Kulmah Jackson, Liberia Land Authority, 17 October 2018.

- The Freedom of Information Act was passed in 2010. Yet implementation had been shallow, with public information officers exclusively working on the FoI yet to happen; and
- The National Code of Conduct required asset declarations by government officials and civil servants; however, the legislature, in particular, had 0% compliance[49] and had disregarded calls for audit participation.

Co-creation and participation recommendations throughout development

Liberia showed evidence of achievement and strong performance in areas of MSF's mandate, composition, and conduct. For example, MICAT established the MSF to oversee the OGP process, which included both high-level GOL and CSO representatives, though their designees attended most meetings. The MSF met monthly and collaborated on forming the action plan, discussed results in regional consultations, and used feedback to augment the action plan. The MSF limited outreach development due to time and budget constraints and centered on informing the public of regional consultations.

Some areas in which Liberia could improve include the following: collaborative mandate development, process transparency, communication, and maintenance of a repository of OGP-Liberia documents. MICAT showed no tangible evidence of an inclusively developed process and explicitly explained and/or documented information on the same (governance structure, rules of the game, happenings, how decisions are made, etc.). In addition, the MSF limited communication during development to participants, and OGP-Liberia had no dedicated website or webpage serving as a repository, thus limiting transparency. However, this was likely due to budget and time constraints.

To improve performance on these areas, which would also contribute to better implementation of the overall action plan, the IRM suggests that moving forward, the following actions be taken:

- OGP-Liberia stakeholders should proactively and regularly publish all aspects of action plan development and implementation on the proposed website, to facilitate wider public engagement and monitoring throughout the action plan cycle.
- OGP-Liberia could introduce a formal feedback and response mechanism as part of the proposed website to ensure that the public can engage with the action plan in a consistent and meaningful manner.
- OGP-Liberia should ensure that a summarized report of how stakeholder feedback and inputs are used is accessible to the public in an ongoing and systematic manner, including availability on the proposed website. This would encourage further engagement throughout the action plan cycle.
- OGP-Liberia could publish press releases aligned with the OGP program cycle to facilitate greater mainstream media and social media exposure.
- Lead CSOs could host an up-to-date and active OGP-Liberia page on their websites, to inform on, communicate about, and link to the proposed OGP-Liberia website. This is crucial to ensuring that Liberia does not act contrary to the OGP process in assessing the country's performance at the implementation stage.

The action plan itself proposed several improvements related to the above. Specifically:

[49] Liberia: 'Zero Percent Compliance' – Anti-Graft Body, President's Office Trade Barbs Over Assets Declaration. Rodney Sieh. Feb 23, 2019. Front Page Africa. https://frontpageafricaonline.com/news/liberia-zero-percent-compliance-anti-graft-body-presidents-office-trade-barbs-over-assets-declaration/

- OGP-Liberia secretariat will support the steering committee and improve advocacy, be a source of technical know-how, facilitate monitoring, and coordinate lead ministries and agencies.
- Steering committee to create a dedicated OGP-Liberia website on which all OGP-Liberia documents are published, host an annual OGP summit, and have continual outreach activities in mainstream and social media outlets.
- OGP-Liberia meetings, trainings, and workshops will be held at iCampus to provide a consistent location for all events.
- Steering committee will meet monthly to discuss progress tracked by a monitoring and evaluation (M&E) template for each commitment and a process tracking document that consolidates each M&E template.

These proposed solutions were confirmed by interviews, although some felt those improvements were approached as supplements rather than being properly addressed during action plan implementation.

IV. Commitments

All OGP-participating governments develop OGP action plans that include concrete commitments over a two-year period. Governments begin their OGP action plans by sharing existing efforts related to open government, including specific strategies and ongoing programs.

Commitments should be appropriate to each country's/entity's unique circumstances and challenges. 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.[50] The indicators and method used in the IRM research can be found in the IRM Procedures Manual.[51] A summary of key indicators the IRM assesses is below:

- **Verifiability:**
  - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
  - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are:
  - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
  - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
  - Public Accountability: Will the government create or improve public facing opportunities to hold officials answerable for their actions?
  - Technology & Innovation for Transparency and Accountability: Will technological innovation be used in conjunction with one of the other three OGP values to advance either transparency or accountability?
- **Potential impact:** This variable assesses the *potential impact* of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
  - Identify the social, economic, political, or environmental problem;
  - Establish the status quo at the outset of the action plan; and
  - Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.

[50] "Open Government Partnership: Articles of Governance," OGP, June 2012 (Updated March 2014 and April 2015), https://www.opengovpartnership.org/sites/default/files/attachments/OGP_Articles-Gov_Apr-21-2015.pdf
[51] "IRM Procedures Manual," OGP, https://www.opengovpartnership.org/documents/irm-procedures-manual

Starred commitments

One measure, the "starred commitment" (✪), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries/entities. Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria:

- Potential star: the commitment's design should be **verifiable**, **relevant** to OGP values, and have **transformative** potential impact.
- The government must make significant progress on this commitment during the action plan implementation period, receiving an assessment of **Substantial** or **Complete** implementation.

This variable is assessed at the end of the action plan cycle, in the *Implementation IRM report*.

General Overview of the Commitments

Liberia's 2017-2019 action plan aimed to facilitate citizens' access to public information, keeping track of and holding government systems accountable and reducing instances of GOL and private corruption. The action plan contained ten commitments with three for each of the major OGP thematic areas—access to information, civic participation, and public accountability—and a tenth commitment addressing the crosscutting theme of technology and innovation for openness. The MSF carried over six out of ten commitments from the previous action plan, showing Liberia's intent to close implementation gaps and achieve transformative change. Within each major theme, the MSF added a new commitment to address an urgent policy issue.

1. Develop a Legislative Monitoring Database[52]

Language of the commitment as it appears in the action plan:

Objective
"This commitment will create a database to track laws and bills within the legislature; and provide regular reports on the status of these laws and bills matched with roundtables to allow for discussion".

Milestones/Activities
- *Track status of bills in the House of Representatives and Senate through ongoing monitoring*
- *Provide analysis on the progress of bills, the sponsor of each bill and who has voted for each bill*
- *Publish ongoing results and analysis in quarterly reports and online through a searchable database*
- *Work with relevant groups inside and outside government through round-tables to push for the passage of critical bills when needed*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1.Overall		✓	✓	✓		✓			✓		Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to develop a legislative monitoring database. Its objective was to create a database to track laws and bills within the legislature and to provide regular reports on the status of these laws and bills matched with roundtables to allow for discussion.

This commitment sought to address problems within the Liberian legislative process. Citizens and civil servants are confounded by the opaque nature of the legislative process, including questions from why a bill is "stuck" or whether a law is applicable after passing both houses and receiving presidential approval or after it has been published (printed).[53] The Joint Legislative Modernization Committee of the 52nd Legislature compiled a handbook – *How Our*

[52] Liberia's Open Government Partnership National Action Plan III July 2017 – June 2019. Open Government Partnership. 2017. https://www.opengovpartnership.org/documents/liberia-action-plan-2017-2019.
[53] Interview of Andrew Nimley, Ministry of Justice, 17 October 2018.

Laws Are Made: Understanding the Legislative Process[54] – intended to provide additional clarity on these issues. However, its design was not coherent in its available (online PDF) form, and the content was not user-friendly. There was also no evidence that the handbook was available to the public in printed form, which was problematic, as only 7.98% of Liberians use the internet.[55]

At the time this commitment was conceived, Liberians' perception of their legislature was poor. Many believed the legislature did not fulfill its mandate or, if they did, that it did not work on behalf of their constituents, pushed legislation with immense conflict of interests, and was disconnected from the needs of their constituents.[56] The legislature was notoriously uncooperative with the implementation of policy, guidelines, and/or tools to improve legislative transparency and accountability, according to a Liberia Anti-corruption Commission representative[57]

This commitment was relevant to the OGP value of access to information, as it permitted the GOL to disclose additional and potentially useful information about the legislative process. It was also relevant to civic participation, as it aimed to provide a platform for citizens to inform about and influence critical legislation, though the commitment did not specify whether this activity included citizens providing input on drafted legislation. The commitment was additionally relevant to the OGP value of technology and Innovation due to its goal of creating an online legislative database.

This commitment was verifiable, as completion could be factually determined by the visual presence of a working and searchable online database and reports and from attendance, minutes, and legislative results from roundtables.

If implemented as designed, this commitment was expected to have a moderate impact on the Liberian legislative process. As the legislature approved national budgets, laws, and concession agreements the GOL had entered, complete transparency would have ensured that citizens are informed, can influence results, and can hold legislators accountable.

Additionally, this commitment would have had the greatest impact on corruption and conflicts of interest if coupled with total legislative adherence to the National Code of Conduct and asset disclosure, including beneficial ownership information (Commitment 9). At the conception of the action plan, reports tracked the legislature's and individual legislators' activities,[58] and the Liberia Legal Information Institute,[59] a nonprofit organization, provided free online access to national legal information. Yet the GOL did not have a legislative database that highlighted the lawmaking process, no centralized repository that provided status on the steps and detailed analysis of the legislative process, and no public forum to strategically influence the process covering all national legislation. At the time, the primary form of public participation was targeted or mass street protests, which took place when the

[54] How Our Laws Are Made: Understanding the Legislative Process. 52nd Legislature of Liberia – Joint Legislative Modernization Committee. https://www.liberianlawmakerswatch.org/sites/www.liberianlawmakerswatch.org/files/how_our_laws_are_made.pdf.
[55] Country ICT Data. Percentage of People Using the Internet. International Telecommunication Union. https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx. Accessed in 2019.
[56] Naymote Partners for Democratic Development. Citizens Attitudes Towards Current Lawmakers in Liberia. May 22, 2017
[57] Interview of James Kingsley, Liberia Anti-Corruption Commission, 12 October 2018.
[58] Strengthening Legislative Accountability and Transparency in Liberia. IREDD Final Legislative Report Card 2016. Institute for Research and Democratic Development. Monrovia.
[59] Liberia Legal Information Institute. http://www.liberlii.org. Accessed 2019.

legislative process was overtly compromised and/or politicized.[60] This commitment aimed to fill this gap.[61]

Next steps

On the basis of the researcher's findings, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider the following:

- Having the steering committee and implementing agency(s) map all steps and stakeholders required to implement the commitment. This exercise should uncover steps required to gain legislative buy-in and coordination and to develop an accessible tracking tool.
- Focusing on actions such as gaining legislative buy-in, exercising legal rights to access information, partnering with online legal resources such as the Liberia Legal Information Institute, and organizing capacity to gather, track, analyze, and report information in a digital format.
- Adding a milestone/activity for gaining legislative support and coordination. This action plan did not list the legislature as a stakeholder to this commitment, which was puzzling as its noted noncompliance – for example, its 0% compliance with asset disclosure – was a binding constraint.
- Making draft legislations, analysis, and reports publicly available and accessible in print form and circulate draft legislation to the public via CSOs.
- Including an image file of signed legislation in the online database and make such file content searchable.

[60] Bettie K. Johnson Mbayo (2017) 'Liberian Women Protest For Passage of Domestic Violence Bill', Front Page Africa, 17 May. Available at http://frontpageafricaonline.com/news/2016news/liberian-women-protest-for-passage-of-domestic-violence-bill/.
[61] Interview of Ralph Jimmeh, OGP Secretariat, 11 October 2018,

II. Publication of Budget Documents

Language of the commitment as it appears in the action plan:

Objective
"The commitment seeks to open up the budget process for citizen participation. An open budget process is essential if citizens are to understand how public resources are being used and managed."

Milestones/Activities
- *Publication of annual audit reports*
- *Publication of the pre-budget statement and the year-end report on budget implementation*
- *Extend coverage of International[62] Financial Management and Information System to an additional 8 ministries & agencies and provide functional/technical support to ensure use and effectiveness*
- *MOFEP will publish, within 3 months of the end of the quarter, data on quarterly central government expenditures, by Ministry, Department and Agency*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓	✓					✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment sought to open up the budget process for citizen participation. OGP-Liberia carried it over from the 2015–2017 to the 2017–2019 action plan to aid advancement of several planned open budget initiatives, including the GOL-led "citizen budget portal" funded in 2018 by SIDA (Swedish International Development Cooperation Agency) and CENTAL's Liberia Online Budget Portal (www.liberiabudget.info), which USAID (US Agency for International Development) supported and launched in 2018.

[62] This is a misprint; it is Integrated Financial Management and Information System.

This commitment aimed to address issues with the Government of Liberia (GOL) budget process. When this commitment was introduced, the budget calendar[63] officially presented the national budget process and scheduled hearings. Though not legally mandated, initial steps—convening the budget working group and its meetings, which consult for evidence supporting budget items—were open to the public. However, executive/policy level discussions were private. Given the budget's very nature and the country's centralized systems, outreach during budget formation was at the national/central level. In complement, the Ministry of Finance and Development Planning (MOFDP) printed an annual citizen's guide to the budget and put drafted and approved budgets online. Liberia's legislative caucuses, county development fund managers, CSOs for transparency analysis, university students conducting research, and citizens interested in specific project areas accessed online budgets.[64]

Nevertheless, "proper community engagement" was minimal due to a poorly wireframed MOFDP website,[65] few opportunities for public engagement with planning processes,[66] and insufficient technical capacities to understand the budget within the public arena.[67] As there were limited funds, complaints of systemic public "underfunding" of basic services were abundant (for example, 95.7% of water, sanitation and hygiene services were funded by donors).[68] The MOFDP wanted community engagement and budget monitoring to encourage accountability of the budget process, allotments, and expenditures, and of those receiving funds and to trigger audits where needed. The MOFDP wanted this "early warning system," as it could only monitor expenditures every six months to one year. The MOFDP believed that this could be accomplished with an online portal of all budget documents and proper training and technical support of local CSOs to use and engage communities through the portal.[69]

This commitment was relevant to the OGP value of access to information, as it aimed to publish pre-budget statements, year-end reports on budget implementation, quarterly expenditures, and annual audit reports and to also put eight entities on the Integrated Financial Management and Information System. This system computerizes accounting and reporting systems and automates allocations, making reporting requirements easier. This commitment also supported other open budget initiatives referenced above; the GOL aimed to disclose previously unavailable reports and make reporting timelier and therefore more relevant to the public. While the commitment's text claimed that it intended to "open up the budget process for citizen participation," it was unclear what this would look like or what, within the context, would change and by how much.

This commitment's activities/milestones were specific enough to be verifiable as they could have been corroborated by physical proof of reports and timelines of their publication, systems being open to and used by additional agencies, and documentation (training aids, attendance logs, testimonials, etc.) of technical training and support pathways.

If implemented as written, this commitment was expected to have a minor potential impact. The budget calendar, drafted and approved budgets, quarterly reports on budget execution and revenue collection, and other relevant documents were already publicly available online.[70] The pre-budget statement and end-of-year implementation would have provided

[63] Summary Budget Preparation Calendar. Ministry of Finance and Development Planning. 2018. https://www.mfdp.gov.lr/index.php/131-new-reports/629-summary-of-budget-prepartion-calendar-fy-2019-20.
[64] Interview of Johnson Williams, MOFDP. 16 October 2018.
[65] Website reviewed by IRM Researcher October 2018.
[66] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.
[67] Ibid.
[68] Water, Sanitation and Hygiene – Sector Performance Report. Government of Liberia. May 2018.
[69] Interview of Johnson Williams, MOFDP. 16 October 2018.
[70] Website reviewed by IRM Researcher October 2018.

additional information. The commitment did aim to make available annual audit reports, support timelier reporting, and, through the Integrated Financial Management and Information System, enhance the accounting capabilities of additional GOL ministries and agencies to make that happen. However, although the commitment was in response to recommendations of the Open Budget Survey of 2015[71] – including "to establish credible and effective mechanisms (i.e., public hearings, surveys, focus groups) for capturing a range of public perspectives on budget matters" – it did not have activities directly related to citizen participation (for example, facilitating citizen participation in initial stages of the budget process). Additionally, the commitment did not meet the MOFDP's need for CSO training and technical support to participate in and to use the portal to engage communities in and monitor the budget process. Without communication with and/or guidance from citizens on funding priorities, complaints about public service funding would persist.

Next steps

Access to budget information and citizen participation in budget processes stand to be core features of open government in Liberia. If future action plans carry commitments in this policy area, the IRM staff believes implementation could benefit if stakeholders consider:

- Ensuring synthesis between commitment activities and similar projects and initiatives (for example, the GOL-led citizen budget portal) through regular briefings on current and future programming within ministries, involving Liberia's OGP Steering Committee and staff responsible for commitment design.[72]
- Including activities that address citizen participation in budget processes. This may reflect the Open Budget Survey's recommendations to: "establish credible and effective mechanisms (i.e., public hearings, surveys, focus groups) for capturing a range of public perspectives on budget matters; publish reports on public budget hearings; and provide detailed feedback on how public assistance and participation has been used by the supreme audit institution."[73]
- Improving ease of access to budget information by revamping key government websites, such as the MOFDP website, to make them more user-friendly.

[71] Open Budget Survey 2015 – Liberia. https://www.internationalbudget.org/wp-content/uploads/OBS2015-CS-Liberia-English.pdf.
[72] During the formulation of this commitment, for example, the MOFDP staff responsible for similar programs were not involved in the planning process and could not alert the MSF on parallel planned programming such as the citizens budget portal.
[73] Ibid.

III. Implementation of the Freedom of Information (FoI) Act

Language of the commitment as it appears in the action plan:

"The commitment is for the appointment of additional Public Information Officers in all counties and to provide additional trainings to ensure they can fulfil their mandate and responsibilities as they relate to the FoI Act".

Milestones/Activities

- *Appointment of additional Public Information Officers in all counties and trainings*
- *Training of PIOs on the online Freedom of Information platform developed*
- *Training for PIOs on how to generate frequently requested documents*
- *Information Commission[74] provides quarterly reports on progress and use of FoI law*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓	✓			✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to address problems with the implementation of the Freedom of Information Act (FoI)—low public awareness and usage and weak government adherence to mandates.[75] The public's low awareness of their right to access information and related laws was rooted in culture and history, with Liberians being unaccustomed to asking for and receiving reliable public information. For those who do seek information, low internet penetration meant that most requests would have to be made in person. However, the highly centralized nature of government in Liberia meant that citizens outside the capital, Monrovia, would not be able to access documents conveniently. Furthermore, the government lacked mechanisms to readily receive and easily respond to requests (getting the request to the right person to provide consistent information in a timely manner), as

[74] This is a misprint; the full name is the Independent Information Commission.
[75] An Act to Establish the Freedom of Information. Ministry of Foreign Affairs, Republic of Liberia. Monrovia, 6 October 2010. http://www.ilo.org/dyn/natlex/docs/ELECTRONIC/104012/126692/F1739999472/LBR104012.pdf

this was not part of someone's job and was not supported by the general work culture. These challenges resulted in weak implementation of the law.[76]

The legislature passed the FoI in 2010 to facilitate access to publicly held information. A robust information management structure and dissemination appropriate to the Liberian context (i.e., more than 15 years of age population literacy rate at 42.94%[77] and percentage of people using the internet at 7.98%[78]) was widely considered the key to effective implementation of the FoI law.[79] The GOL, with support from development partners such as the Carter Center,[80] installed "information officers" at nine ministries and agencies. The program equipped public information officers (PIOs) with designated space, reading rooms, FoI implementation plans, catalogues of documents and records in their possession, drafted and adopted procedure manuals for receiving and responding to requests for information and proactively publishing information, and training on how to raise awareness about freedom of information among agency staff and their constituents.[81] These appointments were to serve as prototypes for other ministries and agencies. The program published a citizen's guide to the FoI, which provided a comprehensive explanation of the FoI and citizens' roles in advancing the right to information.[82]

Under the 2015–2017 action plan, the GOL appointed an additional 48 PIOs. However, they served concurrently as public relations officers (PRO), with their role as "information officer" an additional responsibility in their job descriptions.[83] In practice, this led to conflicts of interest between disclosing information per the law and representing one's ministry or agency.[84] Additionally, there was limited evidence (i.e., no prescribed publication of quarterly reports) of information officers facilitating FoI mandates, and there was no GOL tracking of information requests and feedback. In 2016, the System for Tracking and Monitoring Freedom of Information Requests' monitors and helpline operators collected information regarding requests from key regions. This sample—328 requests reported and entered and 278 used for analysis—showed that 15% of requests were responded to with full or partial information (only 6% within mandated timeframes[85]), approximately 16% were denied (but only half of those cited exemptions), and the remaining 69% were not responded to in any form. In addition, most information requests were delivered physically in letter form.[86]

The Independent Information Commission (IIC) was formed in 2010 after the passage of the FoI and began operations in 2012. The IIC is mandated to ensure enforcement and compliance and to conduct public outreach and build awareness for the FoI. Yet, due to legal and budget constraints, the IIC's coordination with both GOL agencies and CSOs was poor at the time this commitment was written. For example, coordination with the Liberia Anti-Corruption Commission was limited to workshops and meetings on higher-level policy

[76] Interview of Mark B Freemen and Independent Information Commission staff, 18 October 2018.
[77] Liberia. UNESCO Institute of Statistics. http://uis.unesco.org/country/LR. Accessed in 2019.
[78] Country ICT Data. Percentage of People Using the Internet. International Telecommunication Union. https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx. Accessed in 2019.
[79] Svärd, Proscovia. "Has the Freedom of Information Act enhanced transparency and the free flow of information in Liberia?" Information Development 34, no. 1 (2018): 20-30.
[80] The Carter Center – Liberia. https://www.cartercenter.org/countries/liberia.html.
[81] Freedom of Information: Nine Vanguard Government Agencies. The Carter Center Liberia. (No date given).
[82] A Citizens' Guide to the 2010 Liberia Freedom of Information Act. The Carter Center Liberia. (No date given)
[83] Independent Reporting Mechanism (IRM): Liberia End-of-Term Report 2015–2017. Open Government Partnership. 2018
[84] Interview of Mark B Freemen and Independent Information Commission staff, 18 October 2018.
[85] Timeframe ranges from 30 days (if information is held at contacted entity and there is no cause for extension) to 85 days (if transferred twice to reach relevant entity and has further cause for extension).
[86] The System for Tracking and Monitoring Freedom of Information Requests in Liberia: Findings from a Year of Data Collection. 2015-2016. The Carter Center Liberia. (no date given)

issues.[87] It had also worked with the Liberia Freedom of Information Coalition (LFIC), but coordination had subsequently slowed. The IIC did, however, have close collaboration with the Ministry of Post and Telecommunication and iLab Liberia.

iLab Liberia, in collaboration with the LFIC and the IIC and with support from the Carter Center Liberia, launched infoLib,[88] a core component of a previous action plan's commitment, in 2016.[89] infoLib was meant to exercise the FoI and simplify and expedite information requests. Since the website's formation, however, users have submitted only 105 requests. From observation, most requests were long overdue (did not get a response from responsible ministry or agency in a specified time frame) or were awaiting classification (an automatic response from the system, which meant that the classification system was not comprehensive).

This commitment was relevant to the OGP value of access to information, as it aimed to appoint public information officers (PIOs) in all counties and provide trainings to fulfil their mandate and responsibilities according to the FoI Act. This was in response to long waiting times and, therefore, low usage of the FoI. It was also relevant to technology and innovation, as POIs were expected to use the infoLib platform to fulfill information requests.

This commitment was verifiable. Through direct observation and documentation, one could confirm PIO appointments in each county (recruitment materials, TORs, interviews, and field visits), trainings (attendance, minutes, training manuals, and testimonials), and quarterly reports from the IIC. However, the commitment did not specify how many PIOs would be appointed in total, how many (greater than one) per county, nor their coverage (per area or population size).

If the commitment was implemented as written, it was expected to have minor potential impact. Notwithstanding awareness campaigns and tools, the public (and civil servants, including some cabinet members) was inadequately informed on the law and its right to access information.[90] The appointment of PIOs at the county level would have been an opportunity to spread knowledge about and access to GOL-produced information. The commitment sought to place PIOs in counties to represent the GOL and provide immediate opportunities for local residents to make information requests. It also aimed to train PIOs to access the FoI platform (infoLib), providing a mechanism to find sources and track requests. This would have alleviated citizens' need to make arduous trips to the capital, Monrovia, and reduced the impact of poor internet access. It was thus positioned to be another step in rectifying the Monrovia-centric political and social geographies of the country.

However, this commitment did not include milestones addressing core problems affecting the FoI's poor uptake. For example, milestones did not incorporate learnings from the prototype information officers installed in the nine ministries and agencies[91] or address the culture of nondisclosure or problems of how information officers operated (i.e., promoting a favorable public image of the ministry or agency versus providing information requests mandated by the law). Moreover, it did not seek to resolve issues observed when using the FoI platform. In fact, planners did not know how physical needs such as designated space

[87] Interview of Mark B Freemen and Independent Information Commission staff.
[88] InfoLib. http://infolib.org.lr.
[89] Uses mySociety's freedom of information platform, Alaveteli.
https://www.mysociety.org/transparency/alaveteli/
[90] Interview of Mark B Freemen and Independent Information Commission staff, 18 October 2018.
[91] Freedom of Information: Nine Vanguard Government Agencies. The Carter Center Liberia.
https://www.cartercenter.org/resources/pdfs/peace/ati/liberia/foi-nine-vanguard-government-agencies.pdf.

and reading rooms for PIOs would be met.[92] The GOL wanted to "increase" usage although it did not state by how much within the action plan. Planners admitted that, even if requests increased, the system with these additional PIOs was not prepared to manage requests.[93]

Next steps

On the basis of this report's findings, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy containing the following elements:

- Adapting and replicating success factors from "vanguard agencies" in the process of appointing and training county-level PIOs.
- Ensuring institutional compliance with the job descriptions and responsibilities of PIOs, which may include reforming formal guidelines to strengthen adherence to the FoI Act.
- Reviewing and updating the infoLib portal to serve as an efficient resource for county PIOs, including clear communication pathways to and from ministries and agencies, with dedicated officers assigned to manage information requests.
- Drawing on quarterly reports and process evaluations led by IIC to continuously improve implementation of the FoI Act.

[92] Interview of Ralph Jimmeh, OGP -Liberia Secretariat, 11 October 2018 and Mark B Freemen and Independent Information Commission staff, 18 October 2018.
[93] Interview of Mark B Freemen and Independent Information Commission staff, 18 October 2018 and James K. Sulonteh, Ministry of Post and Telecommunications, 12 October 2018.

IV. Citizen Monitoring and Support for the Justice System

Language of the commitment as it appears in the action plan:

Objective
"The commitment seeks to ensure access to justice for citizens by further bolstering jury offices, training magistrates, monitoring the performance of local courts and ensuring citizens are aware of their rights and access to justice."

Milestones/Activities

- *Jury offices established in all 15 counties*
- *Training of 300 magistrates across all 15 counties*
- *Awareness raising around the roles of juries*
- *Track cases in courts to prevent delays in judication*
- *Open Justice initiative through which citizens monitor local courts, track cases and follow-up on the return of bond fees*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓		✓	✓				✓		Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives[94]

This commitment aimed to address problems with Liberians' inherent mistrust of the justice system.[95] The prevalent perception was that the Government of Liberia (GOL) applied justice at any of the 243 magisterial, circuit, or specialized courts discretionally and that those who suffered were the unconnected and/or the poor. There was an ongoing failure of the justice reform process to create an impartial system, and national conceptions of justice were not aligned with a rights-based system, which were believed to affect jury deliberations.[96] This was also exemplified by pretrial detention statistics—63% of the

[94] Interview of Andrew Nimley, Ministry of Justice, 17 October 2018.
[95] Vinck, Patrick, Phuong Pham, and Tino Kreutzer. "Talking Peace: A population-based survey on attitudes about security, dispute resolution, and post-conflict reconstruction in Liberia." (2011).
[96] Raymond, Gavin. Decentralizing Justice and Security in Liberia. Feb 26, 2014. Centre for Security and Governance. http://secgovcentre.org/2014/02/decentralizing-justice-and-security-in-liberia/ Accessed in 2018.

population in Monrovia Central Prison consisted of pretrial detainees, many of whom were poor and unable to post bail.[97]

However, according to the Ministry of Justice (MOJ), long waits for trials were usually the fault of the prosecution, which did not bring cases to trial in a timely manner. Other assessments showed that legal aid was scarce beyond Monrovia, and lawyers charged unlawful fees for representation, which limited access to formal justice.[98] Thus, many people relied on the traditional (informal) justice system.

Another example of a systemic issue stemmed from the Criminal Procedure Law that required bond fee reimbursement to be given by request. People did not know they had to make a request for bond fees to be returned. However, according to the MOJ, all requests were fulfilled once made. Generally, as a result of such issues, Liberians took little interest in the justice system as they believed it did not serve them.

This commitment aimed to improve juror education, reduce long waits for trials, lessen judicial inconsistency, and enhance bond fee administration by bolstering jury offices, training magistrates, monitoring local courts' performance, and ensuring citizens are aware of their rights and access to justice. The commitment was a continuation from the 2015–2017 action plan, which sought to train magistrates and address gaps in serving justice.

This commitment was relevant to OGP values of civic participation and public accountability, as it aimed to raise awareness to increase functional participation in the jury process and provide opportunities for the public to monitor courts and follow up on rights and legal mandates, especially in areas such as pretrial delays and return of bond fees. There were internal audits in place for magistrates to report detainees, caseloads, bond fees, and so on, to circuit courts, which then report to the MOJ. The MOJ was then expected to analyze the audits and publish such reports online[99] and film relevant cases to limit hearsay on final opinions. However, it was unclear to what extent such reports and information were retrieved or used by the public.

Relatedly, to improve access to justice, the MOJ, judiciary, and various international nongovernmental organizations were working to assess and improve court performance—including indicators such as reviewing files and the pace at which cases were adjudicated. There was also a push to strengthen accountability measures within the MOJ. The MOJ saw the discretionary application of the law as a subject requiring CSO attention. Thus, the Open Justice Initiative and the tracking of court cases was considered a way to close this gap, with CSOs leading the initiative, as the judiciary could not evaluate itself. The commitment's implementation took place against this backdrop.

As written, this commitment was objectively verified by observation and documentation on magistrates (recruitment materials, training schedules, attendance, training manuals, and testimonials), awareness (outreach materials and documented events), tracking (documentation and listed interventions and results), and tools used by local citizens to monitor court happenings. However, the commitment did not specify what "training," "awareness raising," or "tracking" would entail.

[97] 2016 Country Reports on Human Rights Practices – Liberia. United States Department of State. UNHCR (United Nations Refugee Agency). 3 March 2017. https://www.refworld.org/docid/58ec8a0e4.html.
[98] ILAC Revisits Liberia for a New Assessment with an Access to Justice Lens. International Legal Assistance Consortium. MAY 22, 2019. http://www.ilacnet.org/blog/2019/05/22/ilac-revisits-liberia-for-a-new-assessment-with-an-access-to-justice-lens/.
[99] During this field visit, the IRM researched could not confirm whether or not reports are made publicly available online.

If implemented as written, this commitment was expected to have a moderate impact on improving access to justice through higher levels of civic participation and public accountability in the justice system. Its completion was expected to facilitate more timely administration of justice within counties, thus reducing related pretrial detentions and increasing public knowledge of how to interact with and serve the courts. However, as the milestones did not specify detailed activities, it was unclear whether the commitment would entirely address preexisting skepticism about the formal justice system.

Next steps

On the basis of this report's findings for this commitment, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy with the following elements:

- Aligning the activity planning and budget processes to ensure that adequate funding is available throughout implementation of this potentially resource-intensive commitment.[100]
- Ensuring that activities are accompanied by realistic goals and targets within the Liberian context, including the number of magistrates to be trained under this commitment. For instance, the experience of the judiciary's 'Professional Magistrate Training Program' show that it took 6 years for 120 magistrates to be trained under the program.[101] This commitment proposed to train 300 magistrates in the space of two years.
- Providing details on commitment milestones to clearly define the nature of proposed activities such as raising awareness, tracking cases, and expanding the Open Justice Initiative. Doing so will also allow related stakeholders to design mechanisms to track and assess the impact of proposed activities throughout implementation.
- Outlining specific information needs and access protocol of the justice sector and completing capacity mapping for CSOs and conducting requisite training to fill capacity gaps.[102]

[100] Interview of Johnson Williams, Ministry of Finance and Development Planning, 16 October 2018.
[101] UNMIL Commends Liberia's Judiciary for Its Effort in Addressing Human Capacity Gaps. United Nations Mission in Liberia. June 16, 2017. https://unmil.unmissions.org/unmil-commends-liberia's-judiciary-its-effort-addressing-human-capacity-gaps. Accessed in 2018.
[102] The judiciary expected CSOs to take the lead in the Open Justice initiative (Interview of Andrew Nimley, Ministry of Justice, 17 October 2018). However, limited CSO capacity and no concrete milestones/activities for execution have been constraints, sometimes requiring the MOJ to step in and train CSOs on how to access and follow-through on judicial information.

V. Implement a Feedback Mechanism to Build Accountability of the LNP

Language of the commitment as it appears in the action plan:

"The commitment will establish a variety of tools and information dissemination modalities to build trust in the police, report infractions and build evidence-based trust in the police force."

Milestones/Activities

- *Establish free, public hotline for complaints and commendations for the LNP*
- *Establish a task force of MOJ and CSO partners to understand police and public safety information currently being collected, to identify information gatekeepers and the current format(s) of data*
- *Design and develop a plan to collect and process high-priority public safety and police information and statistics for publication online on the LNP website*
- *Provide data on crime, accidents and LNP activities through the existing open data portal*
- *Create brochures for citizens with information about the role of the LNP, indicating their rights in relation to the LNP and the procedures for inquiries, complaints and commendations*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓	✓	✓		✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to address public mistrust of the Liberia National Police (LNP). The LNP had undergone complete restructuring and retraining over the past 14 years. At the time the commitment was made, the public overwhelmingly accepted the legitimacy of the LNP, with an expansion of community policing having improved the security and lives of all citizens.[103] However, the LNP continued to be plagued by stories and everyday personal experiences of bribery and excessive use of force, which eroded LNP credibility. Ordinary

[103] Establishing Policing to Serve Communities | Simon Blatchly, Police Commissioner. 8 April 2018. United Nations Mission in Liberia. https://unmil.unmissions.org/establishing-policing-serve-communities-simon-blatchly-police-commissioner. Accessed in 2018.

citizens found no recourse when reporting and resolving their grievances and trying to hold officers accountable for their actions.[104] The 2016 and 2017 Human Rights Situation Reports also documented cases of police unprofessionalism, criminality, and brutalities, a few of which had resulted in deaths.[105]

The LNP wanted to do more to improve its public interactions and gain the public's trust. In 2016, the LNP had a call for proposals for the LNP Accountability Project, which sought to create and strengthen a transparent process for police accountability.[106] In 2017, the LNP, with support from the Carter Center Liberia, launched a website (http://lnp.gov.lr/lnp/) to increase citizen involvement with and accountability of the LNP. However, when accessed, the website was incomplete, and accountability components (such as links to a complaint form) did not work. Per the LNP, most citizens communicate via phone call, not the website, but the website provided useful information on demand for both citizens and LNP staff. The milestones described under this commitment aimed to go further toward moving the LNP in improving its public outreach.

For its part, the LNP saw the OGP framework as an opportunity to properly employ its online resources, coordinate with auxiliary ministries and agencies (e.g., MOJ), and document, quantify, and evaluate their work. With LNP's in-house technical capacity but limited funds, working smarter with current tools stood to generate changes in how the LNP conducted business and approached transparency and public accountability.[107] This commitment aimed to do this by establishing information dissemination modalities to report infractions and recommendations and build evidence-based trust in the police force.

This commitment was relevant to the OGP value of civic participation, as it sought to expand—through a feedback hotline and enhancement of its open data portal—ways for the public to interact with and influence LNP services. The commitment was also relevant to access to information, as it proposed to provide brochures on the role of the LNP and citizens' rights when interacting with the LNP and to collect and avail data on the existing open data portal. It was also relevant to technology and innovation, as it aimed to utilize the data portal for central information storage, maintenance, and access. Although the first milestone committed to establish a complaints hotline, it did not specify any obligation for LNP to respond to or deal with complaints; therefore, the commitment was not coded for public accountability.

The commitment was verifiable as written. The existence of a public hotline, documentation, attendance list, minutes, and reports of task force meetings, plans, and brochures could be corroborated with observation and testimonials. Data on the LNP website' data portal could also be confirmed.

If implemented as designed, the potential impact of this commitment was expected to be minor. The brochures would have been relevant and useful, but they built on the "know your rights" policing campaign that implemented a Facebook page for information and citizen feedback in the 2015–2017 action plan.[108] Additionally, there was no guarantee that they would have been distributed, introduced, and used in desired quantities under the commitment as written. The complaints hotline may have addressed the accessibility

[104] Is the Liberia National Police Truly a Force for Good? Daily Observer. June 29, 2018. https://www.liberianobserver.com/opinion/editorials/is-the-liberia-national-police-truly-a-force-for-good/. Accessed in 2018.
[105] Human Rights Situation Report. Rescue Alternatives Liberia. 2016, 2017.
[106] Liberia Police Accountability Project. Federalgrants.com. http://www.federalgrants.com/Liberia-Police-Accountability-Project-62436.html. Accessed 2019.
[107] Interview of Moses Carter, Liberia National Police, 17 October 2018.
[108] Liberia's Open Government Partnership National Action Plan, 2015-2017, Know Your Rights Initiative, Open Government Partnership. https://www.opengovpartnership.org/members/liberia/commitments/LR0018/

(internet usage) gap presented by the open data portal and made it possible for citizens to inform the LNP of how it serviced the public.

Although this commitment aimed to provide information for the LNP to investigate abuses and take responsibility where warranted, it was unclear how changes would be systemically incorporated to prevent further abuses or influence LNP decision-making or policies. The commitment assumed that more access to information would increase trust in the police. The commitment's milestones did not specifically address how to increase the public's trust (which may include decreasing bribery and excessive use of force and instituting a system for grievance resolution and holding officers accountable). In addition, it is noted that the portal already existed; the commitment aimed to enhance its content and usage.

Next steps

Although this commitment represented an important policy goal, the IRM assessment of the commitment's design suggests that more can be done to address public mistrust and enhance accountability of the LNP in Liberia. On the basis of the findings of this commitment's design, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy that includes the following elements:

- Establishing a fair and efficient grievance redress mechanism to adjudicate and respond to complaints on abuses of process by the LNP and its officers.
- Assessing the online portal on a continuing basis to ensure that it is maintained and fully operational, comprising all key features and necessary functionalities.[109]
- Citing the limited use of internet in Liberia (only 7.98% of Liberians actively use the internet[110]) and limited public knowledge on how to use crime data to advocate for training and better services.
- Introducing a more aggressive awareness-raising campaign for citizens and officers with government support on how best to make effective use of CSOs to bridge civic participation gaps in this and other relevant commitments.[111]

[109] Website observed 17 October 2018.
[110] Country ICT Data. Percentage of People Using the Internet. International Telecommunication Union. https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx. Accessed in 2019.
[111] The role of CSOs become paramount in this instance as, through their community organizing and policy advocacy, they can bridge the gap between the transparency initiatives of this commitment and the civic participation sought. However, this level of CSO engagement is not written into, nor was it an integral part of planning.

V1. Pass Legislation and Support Capacity Building for Integrity in Government

Language of the commitment as it appears in the action plan:

"The commitment will support the passage of critical laws that will help to ensure the integrity and accountability of public servants; support the development of capacity within the civil service; and build a network of honest government officials".

Milestones/Activities

- *Ensure the passage of the Whistleblower and Witness Protection Acts*
- *Strengthen implementation of Executive Order (19) (Code of Conduct for National Officials)*[112]
- *Revise curriculum and provide training to incoming government civil servants through LIPA and the PYPP on issues of accountability and integrity*
- *Build on the Integrity Idol campaign to create a national network of local government officials with integrity to share ideas, collaborate and push for integrity*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓		✓						✓	Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to legally support integrity and accountability within the GOL. As in any fragile context, exposing unlawful and corrupt practices was a dangerous endeavor. Liberia was no different as whistleblowers were routinely harassed, ostracized, penalized, and, in one case, killed.[113] The Protection of Whistleblower – Executive Order No.22 (EO No.22)[114] was a first step to providing an enabling platform for and alleviating harmful

[112] This is a misprint. Correct citation is Code of Conduct of 2014 (not Executive Order (19)) or longform "A National Code of Conduct for All Public Officials and Employees of the Government of Liberia."
[113] Mysterious Death of Liberian Whistleblower Being Investigated. James Butty. 16 February 2015. https://www.voanews.com/a/mystery-death-of-liberian-whistleblower-under-investigation/2645635.html.
[114] Protection of Whistleblower Executive Order No. 22. http://www.liberlii.org/cgi-bin/disp.pl/lr/legis/exec_orders/pow22329/pow22329.html?stem=0&synonyms=0&query=The%20Protection%20of%20Whistleblower%20Executive%20Order%20No.22.

consequences to whistleblowers. The Code of Conduct of 2014,[115] which set standards of behavior and conduct and their regulation and compliance, also provided support for whistleblowers by promoting governance integrity and transparency. EO No.22 was due to expire in 2017, and this presented a need for a permanent legal framework. At the Network of National Anti-Corruption Institutions in West Africa conference in 2015, Liberia received support from the network and UNODC (United Nations Office for Drug and Crime) to draft a whistleblower law. From 2016 to 2017, policy makers circulated the Whistleblower and Witness Protection Bill and discussed it in workshops funded by United Nations Mission in Liberia. They presented a definitive version to the legislature for passage (by then-president Ellen Johnson Sirleaf (EJS)) in 2017. At the time of this commitment, the law had not been passed.

Yet the public met this announcement with skepticism, as many believed that the EJS administration did not offer an enabling environment for whistleblowers.[116] The administration stifled (at best) or harmed (at worst) whistleblowers and demonstrated minimal level of accountability for exposed corruptive practices.[117] In practice, the enforcement of discipline was at the discretion of the president, and proven lawbreakers were either excused, given negligible penalties, or, if dismissed, rehired in similar positions elsewhere.[118] This resulted in many people ignoring illegal activity, with very few becoming actively engaged in working for needed changes.[119]

This commitment also aimed to support the passage of critical laws that may have helped ensure the integrity and accountability of public servants, develop capacity for accountability within the civil service, and build a network of honest government officials. Training on accountability and integrity and recognizing civil servants who practice such ideals through Integrity Idol—a global campaign that recognizes honest governance[120]—could have also helped normalize and support transformation toward such behavior. Stakeholders involved in this commitment were enthusiastic that the political transition would work to their advantage as it might have been used as a bridging effort with the passage of vital legislation that crossed political divides.[121]

This commitment was relevant to the OGP value of civic participation. The commitment's fourth milestone—the integrity idol campaign—was to be based on public votes for government officials and employees. It thus sought to provide the public a platform by which to inform the GOL on the importance of integrity and demonstrated how it can be rewarded in real time.

This commitment was verifiable. Critical to meeting the commitment was advocating for the passage of the Whistleblower and Witness Protection Act (WWPA) and the application of the Code of Conduct of 2014 (COC). One could confirm legislative passage of the WWPA and revised curriculum and training for incoming civil servants by a signed bill and documentation of current curricula, observation showing revisions, and documentation (attendance, training materials, and testimonials) of civil servant training. Activities on "strengthening" the COC and "building on" integrity idol were less verifiable, as there were

[115] Code of Conduct 2014. https://www.emansion.gov.lr/doc/Act_Legislature_Prescribing_A_National_Code%20of_Conduct%20(Final_Version%202014).pdf
[116] Interview of James Kingsley, Liberia Anti-Corruption Commission, 12 October 2018.
[117] Mark Tran. 1 November 2012. Liberia's Johnson Sirleaf defiant over nepotism and corruption claims. The Guardian. https://www.theguardian.com/global-development/2012/nov/01/liberia-johnson-sirleaf-nepotism-corruption
[118] Liberia: FDA, Lands & Mines Connived. 7 April 2015. The New Dawn / All Africa. https://allafrica.com/stories/201504070881.html. Accessed 2019.
[119] Interview of Anderson Miamen, Center for Transparency and Accountability in Liberia, 30 October 2018.
[120] Integrity Idol. http://www.integrityidol.org/category/liberia/.
[121] Interview of Anderson Miamen, Center for Transparency and Accountability in Liberia, 30 October 2018.

no measures proposed on degree of change required to meet those milestones. The overall commitment was nevertheless assessed as sufficiently verifiable.

Liberia was generally considered a country of well-written laws and usually the first of its cohort to enact progressive governance regulations (for example, Liberia was the first African country and second globally to become Extractive Industries Transparency Initiative-compliant in 2009[122]). However, there was wide concurrence that the GOL haphazardly adhered to or applied these legal mandates.[123] If the legislation proposal in this commitment was implemented as written, relevant CSOs expected the potential impact of this commitment to be transformative, as it covered several aspects pertinent to effective anti-corruption legislation.

In addition, the commitment also could have increased knowledge toward, and incentives for, adherence to the Code of Conduct of 2014 (COC) and corresponding institutional guidelines. Subsequent disclosure of information as required by the COC for transparency, accountability, and civic participation (e.g., asset disclosures from officials in certain decision-making roles) could have put a safeguard against abuse of power and changed how the government operates.[124] The Code of Conduct—if adhered to—could have provided a robust check on corruption, especially thorough requirements such as asset declaration, applying to "every public official and employee of government involved in making decisions affecting contracting, tendering or procurement, and issuance of licenses of various types."[125]

The commitment also proposed to appropriately set civil servants' and the public's expectations through training to develop capacity for accountability and support the WWPA and COC. Working in tandem, the WWPA passage could have then been within an enabling environment with expectations (from whistleblowers and the public) of due process and system change. Regardless of its origin and previous administrative disappointments, the WWPA could have changed dynamics, as it is a mechanism to operationalize whistleblower protection and the COC on accountability.

Next steps

Considering the findings of this commitment's design, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy with the following elements:

- Advocating and lobbying to garner legislative support for the WWPA—including working with constituents to urge legislators—to expedite the passage of the law.
- Focusing on operationalizing disclosure requirements within the COC (e.g., disclosure of income, assets, liabilities, net worth, and financial and family interests).

[122] EITI Board recognises the pioneering efforts of Liberia in implementing the EITI and sets out next steps. EITI Secretariat. 24 May 2017. https://eiti.org/news/eiti-board-recognises-pioneering-efforts-of-liberia-in-implementing-eiti-sets-out-next-steps.
[123] Interview of James Kingsley, Liberia Anti-Corruption Commission, 12 October 2018.
[124] Asset Declaration. Liberia Anti-Corruption Commission. http://lacc.gov.lr/asset-declaration/. Accessed 2018.
[125] Code of Conduct 2014.
https://www.emansion.gov.lr/doc/Act_Legislature_Prescribing_A_National_Code%20of_Conduct%20(Final_Version%202014).pdf

VII. Improve Transparency in the Land Authority

Language of the commitment as it appears in the action plan:

"The commitment, a continuation from the 2nd NAP, will make information around land ownership and use more open to the public both on and offline. It will also provide a mechanism for citizens to resolve land disputes through the Land Authority".

Milestones/Activities

- *Make publicly available data on land rights (such as data/locations on land legally owned by private citizens or communities) produced by the government on the NBC platform*
- *Make land deeds and certificates available to the public through the Land Authority*
- *Produce hard copies of data collected and developed through the LEITI and SIMS and distribute these hard copies to relevant communities across Liberia as the basis for discussion*
- *Ensure the Land Authority makes information available related to land and resource governance (including policies, laws, guides for how to register property, updates on government activities and details including GPS coordinates of indigenous and community land ownership information) on its website and in hard copies*
- *Create a standing mechanism through which citizens can seek redress for land rights abuses within the Land Authority*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓	✓		✓	✓			✓		Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to provide crucial and timely information on land distribution and related laws, and provide direction on how the public could exercise its land rights. It also aimed to create a mechanism to expedite citizens' access to justice on land disputes. In aiming to address problems with land rights (or lack thereof), the commitment sought to address an issue that has been contested in Liberia since the country's founding.

After its return to democratic rule in 2005, Liberia continued to award concessions in areas that encroached on customary land (i.e., land owned by indigenous

communities/tribes[126]).[127] With no overarching land rights law and no single agency in charge of land matters, it was difficult to reconcile discrepancies between customary and statutory laws (which focused on public and private land only). This led to disputes about tribal land certificates, unintended breach of contracts by both the GOL and concessionaires, illegal activities, and rekindling Monrovia-rural divides.[128] The GOL created the Liberia Land Authority (LLA) in 2016 as "an autonomous agency with a comprehensive mandate on land matters"[129] and proposed the Land Rights Act (LRA) to help remedy disputes with expanded categories of private, customary, public and government land with an overarching category of protected area. The LRA would also, after the concession's expiration, return lands back to communities.[130]

Land rights were also not just a rural issue. Land grabs and illegal sales had increased exponentially, especially in the Monrovia metropolitan area. As a result, at the time, there was a significant backlog of land dispute cases in courts, making legal remedies a costly and time-consuming process.[131] Previous action plans had aimed to inform citizens of their land rights. This commitment sought to take the next steps in making sure that land rights were realized.

This commitment complemented the LLA's mandate, as the first step in acquiring land or managing a dispute was the possession of correct information and employing it at the right time. The commitment was relevant to the OGP value of access to information because it aimed to make government-held information around land ownership and use publicly accessible on and offline. The commitment was also relevant to technology and innovation due to its proposed use of the Liberia National Concessions Portal[132] (the "NBC platform"). The commitment was further relevant to public accountability, as it provides a mechanism by which citizens can resolve land disputes through the LLA and create opportunities to make government officials accountable for their actions.

According to the LLA, Liberia needed an alternative dispute resolution (ADR) mechanism for land disputes due to bottlenecks in adjudication.[133] The GOL proposed to form the ADR-based stakeholder consultations and align them with judiciary precedent.[134] The LLA would host the ADR mechanism and provide support to and help fast track court cases.[135] All information about and from the ADR would have been made available online. There would also be a land dispute hotline, which tracks calls and documents the number of people (and callers) visiting the agency for assistance.[136]

This commitment was verifiable, as completion could be determined by examining the Liberia National Concessions Portal (NBC Platform) and the LLA website and by tracking requests to the LLA for required documentation and data. Direct observation and testimonials from communities could also corroborate whether information dissemination

[126] Wikipedia contributors, "Customary land," Wikipedia, The Free Encyclopedia, https://en.wikipedia.org/w/index.php?title=Customary_land&oldid=914076557 (accessed September 9, 2019).
[127] Land Rights, Private Use Permits and Forest Communities. Land Commission of Liberia. April 2012. http://eeas.europa.eu/archives/delegations/liberia/documents/press_corner/20130916_01.pdf
[128] Liberia Land Administration Project - Environmental and Social Management Framework. Liberia Land Authority. June 2017.
[129] An Act to Amend Title 12, Executive Law of the Liberian Codes of Law Revised and to Add thereto a New Chapter Creating the Liberia Land Authority. Ministry of Foreign Affairs, Liberia. October 6, 2016.
[130] Ibid.
[131] Interview of Kulmah Jackson, Liberia Land Authority, 17 October 2018.
[132] Liberia National Concessions Portal. http://portals.flexicadastre.com/liberia/.
[133] Interview of Kulmah Jackson, Liberia Land Authority, 17 October 2018.
[134] Ibid.
[135] Ibid.
[136] Ibid.

had been completed. The ADR could have also been confirmed through its physical presence at the LLA and via documented cases and testimonials from the public.

If the commitment was implemented as designed, its potential impact was expected to be moderate. It would have provided a mechanism for either solving or expediting court cases on land disputes. It would have also made pertinent land purchase, use, and ownership information and maps accessible in a useful manner to the public, off and online. This could have, in theory, reduced misinformation, which was one reason fraudulent land activities continued. Because physical data and services were solely housed within the offices of the LLA in Monrovia, the commitment's scope would have been limited to those who either have internet access and/or could easily go to the LLA, maintaining potential geographical limitations for rural communities that would have sought redress.

Next steps

On the basis of this report's findings, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy containing the following elements:

- Leveraging the passage of the Land Rights Act to secure stable funding and technical support to implement activities associated with this commitment. For example, the LLA would establish county land offices and have trained staff to manage those offices, but administrative resources were not available for staff to begin their work due to budget cuts.[137] Commitments could thus be better aligned with the budget cycle to receive adequate resource support for balanced, nationwide implementation.
- Introducing measures to tackle the preponderance of fraudulent land surveys, which have been found to be a major catalyst of land disputes. According to the LLA, there are only 75 professional surveyors in Liberia.[138] An Act Against the Criminal Conveyance of Land (2014, AACCL) does exist, yet no fraudulent surveyor has been found guilty or reprimanded accordingly.[139]
- Consolidating all information platforms (LLA, Liberia Extractive Industries Transparency Initiative, and National Bureau of Concessions) to better leverage GOL technical capacities and streamline user interfaces.

[137] Ibid.
[138] Through war and peace, Liberia's land legacy. Thomson Reuters. Tax and Accounting, Government. 1 August 2017. https://tax.thomsonreuters.com/content/dam/ewp-m/documents/tax/en/pdf/case-studies/liberia-land-legacy-case-study.pdf.
[139] Interview of Kulmah Jackson, Liberia Land Authority, 17 October 2018.

VIII. Improve Accountability and Value for Money through Open Contracting

Language of the commitment as it appears in the action plan:

"This commitment seeks to improve accountability and value for money through open contracting by adopting international standards, opening up information that can be used to judge the accountability of contracting processes and creating a forum to provide oversight of procurement processes."

Milestones/Activities

- *Adoption of the open contracting data standard, a global open-source tool to enable disclosure of data and documents along the entire contracting process (the planning, tenders, awards, contracts and implementation phases) and application of this standard to identified projects*
- *Establish administrative directive and guidelines and ethical codes mandating application of the open contracting system for public contracts*
- *Publish all contracting data on the open data portal by default, which will also be compliant with the open contracting data standard*
- *Civic education on procurement and contracting processes to support citizens in understanding how these processes happen and their duties to oversee them, through a specific, time-bound sensitization campaign*
- *Establish open contracting forum comprising of government, civil society and the private sector to ensure sustained engagement, oversight and improved procurement processes. The forum will follow the open government principles of equal participation and co-creation and will be tasked to select a number of projects to monitor using the open contracting data standard and web portal*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓	✓	✓		✓				✓	Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to address problems of a limited capacity for implementation and accountability within public procurement frameworks. Inconsistent access to information, limited whistleblower protections, low capacity in public and private sectors, and no

application of conflict of interest mandates left little room for monitoring and therefore accountability.[140] Planners and lead agencies saw the incorporation of open contracting – "publishing and using open, accessible and timely information on government contracting to engage citizens and businesses in identifying and fixing problems" – as a pathway to bring about openness in procurement and contracting. The process was expected to follow Open Contracting Data Standards (OCDS) – a defined common data model that enables disclosure of data and documents at all stages of the contracting process.[141]

This commitment, which aimed to adopt international open contracting standards, was relevant to the work of the Public Procurement and Concessions Commission (PPCC), which regulates and stipulates structures, methods, and procedures for all forms of public procurement and concession.[142] It would have also expanded Liberia Extractive Industries Transparency Initiative's (LEITI) mandate of promoting open and accountable management of extractive resources to all GOL procurement practices. LEITI, which was effectively a pilot program, had been a success in driving transparency, accountability, and monitoring of the extractives sector.[143] Although timely reporting was inconsistent, the open data work of LEITI led to some high-profile legal cases (most recently the Exxon Mobil oil deal[144]), and it continues to push for beneficial ownership disclosures, especially by lawmakers responsible for confirming contracts within the sector.[145] The Ministry of Finance and Development Planning, with assistance from the World Bank, also maintained an open data portal.[146]

Regardless of PPCC's mandate, at the contracting stage, the GOL awards most concession agreements independent of the PPCC format.[147] To counter this, PPCC pushed for a standardization and adherence to the PPCC legal framework, which allows for an open process and enforcement of accountability measures. For example, the PPCC eProcurement Platform[148] registers and lists all businesses that can compete for public tenders and gives information on calls for proposals and approved contracts over a certain amount. Yet there was no accountability tool that involved the public in the oversight of processes. The establishment of an open contracting forum would have provided such a mechanism.

Planners saw this commitment as necessary for good governance, anti-graft, and improvement of the investment climate. More and accurate information was expected to reduce public speculation and questionable decisions by both the GOL and contractors. Examples include the Sable Mining Company concession[149] and the Exxon Mobil oil deal.[150] The commitment would have benefitted the public by allowing for better competition in public procurement, therefore ensuring value for money.

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[140] Roberto Martínez Barranco Kukutschka. Liberia: Overview of Public Procurement. 12. Anti-Corruption Resource Centre. August 2013 Number: 388. https://www.u4.no/publications/liberia-overview-of-public-procurement.pdf.
[141] Open Contracting Partnership. https://www.open-contracting.org. Accessed 2018.
[142] An Act Creating the Public Procurement and Concessions Commission. 2005. http://www.ppcc.gov.lr/doc/PPCC%20Approved%20ACT.pdf.
[143] Extractive Industries Transparency Initiative. https://eiti.org/document/liberia-eiti-2009-act
[144] By Scott Patterson, Bradley Olson and James V. Grimaldi. How Tillerson's Exxon Designed an Oil Deal to Skirt Anticorruption Scrutiny. Wall Street Journal. March 30, 2018.
[145] Interview with Myer Saye, formerly of Liberia Extractive Industries Initiative. 16 October 2018.
[146] Interview with Johnson Williams. Ministry of Finance and Development Planning. 16 October 2018.
[147] Liberia natural resources deals not compliant with law, find. Afua Hirch. 8 May 2013. auditorshttps://www.theguardian.com/world/2013/may/08/liberia-natural-resources-deal-audit
[148] PPCC E-Procurement Platform. http://vr3.ppcc.gov.lr.
[149] Global Witness Exposes Bribes to Tope Liberian Officials by UK Mining Company. https://www.globalwitness.org/en/press-releases/global-witness-exposes-bribes-top-liberian-officials-uk-mining-company-and-varney-sherman/.
[150] How Tillerson's Exxon Designed an Oil Deal to Skirt Anticorruption Scrutiny. By Scott Patterson, Bradley Olson and James V. Grimaldi. Wall Street Journal. March 30, 2018. https://www.wsj.com/articles/how-exxon-designed-an-oil-deal-to-skirt-anticorruption-scrutiny-1522338992.

This commitment was relevant to the OGP value of access to information because, as in accordance with open contracting standards, it would have made available data along the contracting process and published these data online. It was also relevant to civic participation, as it aimed to educate the public on procurement topics and provided a forum for the public to engage in the process. It also sought to form and make operational an open contracting forum through which citizens could monitor projects. Using the open data standards and disclosing data at all steps in the contracting process would have permitted scrutiny and the possibility of amending procurement practices before legally binding activities occur. However, some considered true accountability – with repercussions – a function of the judiciary and anticipated limitations stemming from citizen-driven accountability measures. The commitment was also relevant to technology and innovation, as it aimed to use an online portal to disseminate contracting information.

As written, this commitment and related milestones were verifiable. Projects using open data standards, legal mandates that ensure adherence to open data, and published data on the open data portal could be confirmed through observation and documentation. Civic education and the open contracting forum could be confirmed through documentation, attendance lists, minutes, reports, and testimonials.

If implemented as designed, the commitment's potential impact was expected to be transformative. PPCC's eProcurement Portal previously provided basic information (no tender documents or awarded contracts), it did not cover implementation phases, the portal's public utilization was poor, and the portal's operation was unsustainably dependent on one person. In addition, LEITI struggled to maintain timely and open adherence from its participating companies and citizens – including the media and CSOs – which did not know how to properly engage on this issue before contracts were signed.[151] If the GOL universally institutionalized the concept and practice of open contracting and reviewed and improved the process to enhance public accountability, it may have transformed the way local and foreign contractors operated in Liberia (i.e., with the expectation of corruption[152]) and fostered adherence to procurement, disclosure, and contract rules. The forum may have also significantly enhanced the role and participation of the public in how public funds are spent.

Next steps

Stakeholders agree that the transparency, accountability, and legitimacy inherent to open contracting standards stand to improve not only governance but also economic prospects in Liberia.[153] Based on this report's findings of the commitment's design, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy that includes the following elements:

- Reconciling the work of LEITI and PPCC with respect to open data and consider using the eProcurement Platform to host all contracting data, as it closely aligns with open data standards.
- Ensuring that there are functioning mechanisms by which the public can monitor procurement projects and hold the GOL accountable for violations.
- Securing the support and buy-in of the National Investment Commission and the National Bureau of Concessions in efforts to introduce open contracting to ensure overall consistency in how the government conducts procurement.

[151] Interview of Dorbor Jallah, Public Procurement Concessions Commission, 18 October 2018.
[152] Ibid.
[153] How transparency can help the global economy to grow. Alex Konanykhin. 10 October 2018. World Economic Forum. https://www.weforum.org/agenda/2018/10/how-transparency-can-help-grow-the-global-economy/.

1X. Institute a Beneficial Ownership Registry

Language of the commitment as it appears in the action plan:

Objective
"The commitment will develop a public register for beneficial ownership information. The development of the register will be instituted through implementing rules and procedures using open data standards".

Milestones/Activities

- *Commence consultations and workshops around the issue of beneficial ownership*
- *Sign Liberia up to the Open Ownership Global Register*
- *Constitute a coordinating committee to establish clear rules on beneficial ownership in Liberia*
- *Begin the process of establishing an open register of beneficial ownership for all companies operating in Liberia per international open data standards*
- *Awareness raising and capacity building on beneficial ownership for public officials, civil society and investigative journalists*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✓	✓	✓		✓		✓			Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to begin the process of developing a public register for beneficial ownership information using rules and procedures aligned with open data standards. Beneficial ownership disclosure remains part of the international best practice on accountability and integrity and provides a check on those in power. However, for beneficial ownership to be properly leveraged, it must be accompanied by strong laws, enforcement of those laws, and technology to track ownership.[154] As such, key stakeholders involved in the formulation of this commitment were enthusiastic about the potential of a beneficial ownership registry.[155]

[154] Radon, Jenik, and Mahima Achuthan. "Beneficial Ownership Disclosure: The Cure for the Panama Papers Ills." Journal of International Affairs 70, no. 2 (2017).
[155] Interview of James Kingsley, Liberia Anti-Corruption Commission, 12 October 2018.

In 2015, the Liberia Extractive Industries Transparency Initiative's (LEITI) piloted a program on beneficial ownership disclosure in the natural resource sectors – i.e., disclosure of the top five natural persons or anyone with a certain percentage of shareholdings and persons of influence over the action of the extractive company.[156] During implementation, LEITI faced difficulty obtaining accurate or sufficient public information on companies or in securing cooperation from GOL regulatory agencies to provide contracting information. In turn, agencies stated that once the GOL assigned contracts, they received minimal reporting from concessionaires and found it challenging to follow up on contracts' legal mandates, as they did not have final or complete agreements. Compliance was 55%, and some companies listed other companies as their owners. In essence, no one wanted to disclose.[157] The legal requirement for disclosure of beneficial ownership information came from the LEITI Act and the Petroleum Act (approved 2016) and, as a consequence, covered contracts that fall under these pieces of legislation. Therefore, disclosure depended on GOL agencies' adherence to and implementation of their regulatory responsibilities under these acts and on political will.

While the LEITI pilot was a first step in assessing the level and type of reporting that had previously occurred, this commitment aimed to address the need for regulated and standardized reporting of beneficial ownership. Given the 2016 passage of the New Petroleum Reform Law of Liberia 2014 that required all bidding oil companies to declare their owners,[158] and to a lesser extent, international events such as the release of the Panama Papers and related scrutiny of the Liberian International Shipping and Corporate Registry,[159] the GOL viewed beneficial ownership disclosure positively. It was considered a means to increase transparency and reduce conflicts of interest of GOL officials in the position to exercise undue influence in contracting decisions, which may have resulted in revenue loss.

This commitment was relevant to the OGP value of access to information as, by signing Liberia on to the Open Ownership Global Register, Liberians would be mandated to disclose business ownership. The establishment of a register would have provided access to this information. This commitment was also relevant to civic participation, as it included public consultations and awareness raising of civil society on beneficial ownership. The commitment also sought to ensure that the register was publicly available online and was thus relevant to the value of technology and innovation for transparency. Activities proposed to achieve the commitment objective began with consultations and questionnaires on beneficial ownership with registered businesses and legal requirements on publishing the register.[160] However, the appropriate lead implementing agency, the Liberia Business Registry (LBR), was not involved in the commitment planning process.

This commitment was verifiable. Consultations for public buy-in, being a signatory to the Open Ownership Global Register, and forming a committee and establishing rules for a Liberian registry could be confirmed by documentation (signed agreement, and attendance list, materials used, and testimonials of organizing and delivering consultations, workshops, and a coordinating committee). Awareness raising for CSOs could also be confirmed by event materials, attendance lists, and testimonials. Although there was limited clarity on

[156] Beneficial Ownership Report. Liberia Extractive Industries Transparency Initiative. December 2015. http://www.leiti.org.lr/uploads/2/1/5/6/21569928/leiti_beneficial_ownership_final_report__december__2015.pdf.
[157] Ibid, and Interview of Myer Saye, formerly of Liberia Extractive Industries Transparency Initiative, 16 October 2018.
[158] Liberia Passes Historic Oil Law Requiring Companies to Publish Names of Their Owners. Global Witness Press Release. Nov. 28, 2016. https://www.globalwitness.org/en/press-releases/liberia-passes-historic-oil-law-requiring-companies-publish-names-their-owners/. Accessed 2018.
[159] Liberia: America's outpost of financial secrecy. George Turner. 26 May 2016. Finance Uncovered. https://www.financeuncovered.org/investigations/liberia-americas-outpost-financial-secrecy/.
[160] Ibid.

what *beginning* the process entailed, the activity to "begin the process of establishing an open register…" could have been confirmed by comparing progress with requirements of the Open Ownership Global Register and open data standards.

If the commitment was implemented as written, its potential impact was expected to be minor. Building on the LEITI's Beneficial Ownership Roadmap (2016),[161] the commitment mapped preliminary steps for Liberia to house a beneficial ownership registry. If implementation had been successful, the commitment could have increased transparency and reduced revenue loss from devaluing assets due to conflicts of interest, a chief reason for civil society's push for and support of the commitment.[162] In addition, adherence could have reduced potential international scrutiny and listing on tax haven blacklists[163] due to the Liberian International Shipping and Corporate Registry, an offshore company registry that is managed on the GOL's behalf.

However, the commitment did not seek to address problems faced during the LEITI pilot program (i.e., difficulty obtaining accurate or sufficient public information on companies, poor cooperation from GOL regulatory agencies, and poor government stewardship and, therefore, minimal reporting from concessionaires). Furthermore, milestones did not explicitly mention data collection mechanisms and/or pathways on how the government may have mitigated technical challenges (limited expertise, technology, etc.). CSOs stated that the implementation of this commitment may reduce corruption but that it would have lesser impact on the problem of tax avoidance by companies with international supply chains due to transfer pricing.[164]

Next steps

On the basis of the IRM's findings of this commitment's design, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy that includes the following elements:

- Ensuring the availability of sufficient financial resources to effectively operate the beneficial ownership registry.[165]
- Reactivating and strengthening the Liberia Business Registry, the government agency with a related functional and legal mandate, or exploring the possibility of a sustainable alternative to monitor company registry information.[166] During field work, the IRM researcher was unable to connect with the LBR, as it seemed inoperative (its website was down, there was no clear designate within the Ministry of Commerce and Industry, and a contact did not respond).[167]
- Introducing a feasible mechanism—that takes into account existing constraints—to verify beneficial ownership information. The LEITI pilot project demonstrated that a detailed investigative process to follow up on submissions of beneficial ownership were too onerous in light of existing technological and technical know-how.[168]

[161] Beneficial Ownership Roadmap. Liberia Extractive Industries Transparency Initiative. December 2016.
[162] Interview of Anderson Miamen, Center for Transparency and Accountability in Liberia. 30 October 2018.
[163] West African Journal Magazine. Liberia Blacklisted as an "Offshore Tax Haven." February 19, 2019 https://westafricanjournalmagazine.com/2019/02/19/liberia-blacklisted-as-an-offshore-tax-haven/. Accessed 2019.
[164] Interview of James Kingsley, Liberia Anti-Corruption Commission, 12 October 2018
[165] Beneficial ownership transparency - Milestones on the road to 2020 Highlights from EITI countries. Extractive Industries Transparency Initiative. https://eiti.org/sites/default/files/documents/eiti_botmilestones_8.pdf.
[166] Interview of James Kingsley, Liberia Anti-Corruption Commission, 12 October 2018 and interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.
[167] All contacts and references made October 2018.
[168] Beneficial Ownership Report. Liberia Extractive Industries Transparency Initiative. December 2015.

X. Implementation and Use of an Open Data/citizen Navigation Portal

Language of the commitment as it appears in the action plan:

"The commitment will allow for a better understanding, collection and production of data related to policy-making in Liberia through a series of data-collection, cleaning and synthesis activities; and ongoing development of an online platform to disseminate data".

Milestones/Activities

- *Conduct a prioritized audit of IT capacity and gaps within government bodies relevant to the OGP process*
- *Conduct surveys of citizens to understand exactly what data they want from government*
- *Collection of datasets from relevant ministries and conversion to machine-readable formats to make the data easy to use and repurpose*
- *As part of the platform, create geospatial portal with all concession agreements and related shapefiles, including agriculture, mining, and timber concessions, as well as Community Forest Management Agreements. Include maps of all community and customary lands that overlap with these concessions*
- *User design and feedback process to understand how best to integrate and display data*
- *Coordinate with the Aid Management Platform to ensure all aid data is available publicly on that platform, and it is linked to the open data platform*
- *Interactive, structured community building on open data issues between key civil society organizations in Liberia and those across the continent working on open data and transparency issues including a series of video-conferences, online discussions and virtual events to share thoughts, cross-pollinate ideas and build collaborations*

Start Date: June 2017

End Date: June 2019

The full action plan is available at the following link: https://bit.ly/2S3wXwu

Commitment Overview	Verifiability		OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
	Not specific enough to be verifiable	Specific enough to be verifiable	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Overall		✔	✔	✔		✔			✔		Assessed at the end of action plan cycle.				Assessed at the end of action plan cycle.				

Context and Objectives

This commitment aimed to tackle the disparate storage, maintenance, optimization, and dissemination of GOL data, particularly in the context of the OGP process.

In 2011, the GOL began implementation of the National Telecommunications and ICT Policy 2010–2015,[169] the nation's first ICT (information and communications technology) policy. Within the policy, e-governance was recognized as a way for ministries and agencies to communicate, share information, and collaborate. The policy also promoted the inclusion of chief information officers to align platforms and connect agencies from the Africa Coast to Europe (fiber optic cable) Backbone.[170]

The vision of a national data portal began in 2014 with an e-government GOL program. The portal[171] went live in 2016, although it was not formally launched. The portal was meant to serve a similar purpose as USA.gov[172] does – which was to create and organize timely, needed government information and services and make them more accessible.[173] The key clientele of this portal included the GOL, domestic and diaspora Liberians, and potential foreign visitors. Site administrators were also working on a legislative component (similar to Congress.gov)[174] that housed legislators' information and contacts, committee reports, bills, legislation, and an online forum.[175] At the time of the commitment design, the portal provided links to websites of ministries and agencies and their online services and an unpopulated data repository page.[176] Site managers communicated with users through email, but there was no tracking of, or data on, general usage.[177]

Led by the Ministry of Post and Telecommunications (MOPT), this commitment aimed to implement a series of data-collection, cleaning, and synthesis activities and support the ongoing development of the aforementioned portal (elibeira.gov.lr) to disseminate data. This commitment sought to consolidate all GOL website and online tools and continue the development of the eLiberia portal, which may have allowed for easier access to information and was thus relevant to the OGP value of access to information. It was also relevant to civic participation, as it proposed to engage and survey citizens on their data requirements, gather user feedback, and involve civil society in resolving open data and transparency issues. It was also relevant to technology and innovation for transparency, as it aimed to enhance transparency through the use of an online portal.

The commitment was an opportunity for eLiberia to be a repository of information and e-services. Other commitments' objectives – the legislative monitoring database, citizen budget portal, and open data portals referenced by the Ministry of Finance and Development Planning, the Liberia National Police's data portal, the Liberia National Concessions Portal, the eProcurement Portal, and open contracting – also depended on an existing portal or the planned "open data portal."[178]

This commitment and its milestones/activities were verifiable as written, although the formulation of "allowing for better understanding of data related to policy making in Liberia" was vague, with no clear definition of what "better" meant. All milestones could have been corroborated with digital and physical documentation, including the presence of the online forum, integration with and inclusion of materials from other platforms, focus groups for website upgrades, and the audit report.

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[169] National Telecommunications and ICT Policy. 2010-2015. Ministry of Post and Telecommunications. http://www.lta.gov.lr/doc/ICT%20_%20Telecom%20Policy%20Header.pdf
[170] Interview of James K. Sulonteh, Ministry of Post and Telecommunications, 12 October 2018.
[171] eLibera. www.eliberia.gov.lr
[172] USA.gov. www.usa.gov.
[173] USA.gov. https://www.usa.gov. Accessed in 2018.
[174] Congress.gov. www.congress.gov.
[175] Interview of James K. Sulonteh, Ministry of Post and Telecommunications, 12 October 2018.
[176] Site was accessed October 2018.
[177] Interview of James K. Sulonteh, Ministry of Post and Telecommunications, 12 October 2018.
[178] MOPT aimed to incorporate relevant commitments into eLiberia platform and expected to be a coordinating body to, or part of, other relevant commitments.

If implemented as written, this commitment may have addressed the pertinent problem of how to systematically collect, store, and make available GOL information and data and provided practical steps (activities) in reaching a solution. Therefore, this commitment was expected to have a potential impact of moderate. In comparison to the existing eLiberia portal – with links to ministries' and agencies' websites and an unpopulated data repository page, received user feedback via email, and no monitoring or engagement[179] – this commitment aimed to standardize data collection, presentation, and accessibility across the GOL. It also aimed to incorporate the public by gathering empirical evidence of its requirements, making available data usable, and providing a mechanism for user feedback and also sought to incorporate views from CSOs on open data issues, specifically user difficulty navigating government websites (i.e., poor site structures), incomplete information on sites, and difficulty receiving information from ministries and agencies.[180]

Next steps

On the basis of the IRM's analysis of this commitment's design, if future action plans carry commitments in this policy area, implementation could be benefitted if stakeholders consider a work plan or strategy that include the following elements:

- Cataloguing existing government websites, portals, and other ICT products to provide a clearer understanding of GOL's ICT landscape and, thus, aid coordination across platforms.
- Integrating eLiberia into other relevant commitment activities that aim to foster transparency of government-held information, which may require the involvement of MOPT as a key partner in the implementation of several commitments.
- Performing regular upgrades and enhancements to ensure that the data portal and interface are user-friendly and easily navigable for citizens with varying technological competence.

[179] IRM Researcher visited website November 2018.
[180] Interview with Lawrence Yealue, Accountability Lab. 11 October 2018.

V. General Recommendations

This section aims to inform development of the next action plan and guide implementation of the current action plan. It is divided into two sections: 1) IRM key recommendations to improve OGP process and action plans in the country or entity and, 2) an assessment of how the government responded to previous IRM key recommendations.

5.1 IRM Recommendations

The 2017–2019 action plan's commitments took forward six commitments[181] from the previous action plan and introduced four new commitments.[182] Nine out of the ten commitments included a component on access to information, predicated on an internet-based interface. Generally, the action plan commitments also appeared to meet Liberians' appeal for improved and fairer government expenditures and justice and for eliminating corruption. Yet, the development and design of the action plan may have been improved further with a stronger focus on the feasibility of commitments—aligning the action plan with budget processes, proactively disclosing information pertaining to the OGP process, and linking the potential of open governance to emergent public concerns. Based on these observations, the IRM proposes the following recommendations to inform future action plan development and to support the design and implementation of strong commitments:

Map steps and stakeholders required to effectively operationalize commitments within the prevailing context and constraints.

An assessment of commitments included in the action plan suggests that the multi-stakeholder forum (MSF) formed commitments with an inadequate assessment of the operating environment, including Liberia's political, economic, and cultural constraints. For example, Liberia's culture of nondisclosure is pervasive and requires a complete cultural change regarding information,[183] which is very difficult to achieve.

Therefore, as Liberia co-creates new commitments to be included in future action plans, the IRM recommends that the steering committee and relevant implementing agency produce a detailed mapping of all steps and stakeholders required to operationalize the commitment within current contexts and choose activities that are feasible within the action plan time period. For a few commitments, key implementing agencies and/or staff responsible were absent, and some stakeholders were not forthcoming about their capacity to complete commitments as written. The IRM thus advises that members of the secretariat be aware of current and future programming within ministries and agencies, related roles, and results when available. This information can then feed into the next planning process for the national action plan and increase the probability of successful commitments.

Align action plan development with budget processes and timelines, to provide opportunity for advocacy and for the GOL to allocate sufficient resources to support OGP-Liberia activities.

[181] These commitments are: Publication of Budget Documents; Implementation of the Freedom of Information Act; Citizen Monitoring and Support for the Justice System; Pass Legislation and Support Capacity Building for Integrity in Government; Improve Transparency in the Land Authority; and Implementation and Use of an Open Data/Citizen Navigation Portal.

[182] These commitments are: Develop a Legislative Monitoring Database; Implement a Feedback Mechanism to Build Accountability of the LNP; Improve Accountability and Value for Money through Open Contracting; and Institute a Beneficial Ownership Registry.

[183] Interview of Mark B. Freeman, Independent Information Commission, 18 October 2018.

In the development of the 2017–2019 action plan, the MSF did not take measures to align action planning with the government budget process. As a consequence, implementing agencies had limited, if any, budgetary provision to support OGP-Liberia commitments' activities ancillary to their work plans. The adoption of this procedural measure and allocation of public resources toward OGP activities may also indicate wider government support of OGP ideals.

Establish a dedicated OGP-Liberia website where information on all aspects of the national OGP process can be proactively published.

A dedicated OGP website may allow Liberia to meet several objectives toward the strengthening of the country's commitment to open government and its membership in OGP. For example, the website may be used to raise awareness and share key information pertaining to the OGP process in the country, including the remit, membership, and governance structure of the MSF; introduce opportunities for stronger public participation in the development of commitments in the action plan; and even provide a useful channel in which the government could interact with citizens, including through the provision of reasoned responses on how commitments are selected and priorities set.

This website may also be used as an online repository that provides a historical record and access to all documents related to the national OGP process, including (but not limited to) consultation documents, National Action Plans, government self-assessments, IRM reports, and supporting documentation of commitment implementation. It is important to note that the availability of an online repository with such information is a key standard assessed by the IRM, and a country may be considered to be acting contrary to OGP process if this standard is left unmet.

Define and elaborate measurable quantitative and/or qualitative indicators under each commitment included in the action plan to facilitate monitoring, evaluation, and learning.

The introduction of measurable indicators will enable the MSF and other implementing stakeholders to develop a mechanism for the monitoring and evaluation of action plan commitments and to assess the success of commitment activities against the overall objectives of the commitment. This mechanism will support the forum to not only better implement and monitor the action plan effectively but also to use the findings as a learning opportunity in the development of future plans. This would also require that stakeholders take steps at the outset to ensure that the commitment objective is discussed and clearly included in the action plan.

Strengthen outreach and advocacy on OGP to encourage wider public participation and engagement in related processes.

Liberians perceive widespread corruption[184] and corruption as a binding constraint to Liberia's progress and development.[185] While open data have been linked to better economic outcomes,[186] successive governments have espoused the value of transparency,

[184] Afrobarometer - What Are Liberians Saying about Corruption and Trust in Public Institutions in Liberia? An Afrobarometer Survey Reveals. August 21, 2013. https://afrobarometer.org/sites/default/files/media-briefing/liberia/lib_r5_presentation2.pdf. Accessed 2019.
[185] National Millennium Compact Development Project. Liberia Constraints Analysis. September 2013. https://assets.mcc.gov/content/uploads/2017/05/Liberia_CA_withCover.pdf. Accessed 2019.
[186] The economic benefits of Open Data. European Data Portal. 06/12/2017. https://www.europeandataportal.eu/en/highlights/economic-benefits-open-data.

integrity, respect for rights and democracy, and a strong private sector.[187] There is, therefore, a clear opportunity for OGP stakeholders in Liberia to link and leverage the benefits of open government to the priorities and concerns of the country's citizens.

In this context, the IRM recommends strengthening efforts to raise public awareness of the value proposition of OGP and opportunities to engage in the OGP process, facilitating the participation of a wider demographic of citizens in consultations, and hosting inclusive consultation workshops to identify the priorities of citizens across Liberia.

Table 5.1: Five Key Recommendations

1	Map steps and stakeholders required to effectively operationalize commitments within the prevailing context and constraints.
2	Align action plan development with budget processes and timelines, to provide opportunity for advocacy and for the GOL to allocate sufficient resources to support OGP-Liberia activities.
3	Establish a dedicated OGP-Liberia website where information on all aspects of the national OGP process can be proactively published.
4	Define and elaborate measurable quantitative and/or qualitative indicators under each commitment included in the action plan to facilitate monitoring, evaluation, and learning.
5	Strengthen outreach and advocacy on OGP to encourage wider public participation and engagement in related processes.

5.2 Response to Previous IRM Key Recommendations

Table 5.2: Previous IRM Report Key Recommendations

Recommendation		Responded to?	Integrated into Current Action Plan?
1	**Clarify commitment ownership and responsibility.** To strengthen public accountability and project execution, the next plan should establish which government agencies are responsible for completing commitments.	✓	✓
2	**Disclose operational budgets, work plans, and aid** to better enable CSOs to track government and international donors' spending.	✓	✓
3	**Expand land commitments** to provide citizens with information on how to register land, and develop a system of recourse for citizens to report and resolve land ownership disputes.	✓	✓
4	**Publicize transparency platforms** —such as the Aid Management Platform —and work with intermediary organizations to educate and engage the public in tracking and acting on findings.	✓	✓

[187] Five things George Weah has promised Liberians. 23 January 2018. https://www.news24.com/Africa/News/five-things-george-weah-has-promised-liberians-20180122-2.

5	**Anti-corruption enforcement.** To engage more citizens in the fight against corruption, the next action plan could develop grievance mechanisms that allow citizens to report, track, and appeal cases of corruption, especially in the judiciary or national police.	✓	✓

OGP-Liberia addressed all previous recommendations through the 2017–2019 action plan. All commitments clearly delineated lead and supporting agencies. Commitment II targeted open budget, and Commitment X linked the aid management platform to an open portal. Commitment VII aimed to improve transparency at the Liberia Land Authority, and citizens were expected to receive more information on land registration and a new resolution mechanism. Commitments IV, V, VII, VIII, and IX included efforts to increase awareness of transparency efforts. Anti-corruption enforcement was also introduced and expanded with citizen monitoring of the judicial system by Commitment IV and the Liberia National Police's feedback mechanism in Commitment V.[188]

Although the action plan generally responded to the recommendations, the ability to "act on findings" and "appeal cases of corruption" were not addressed in this action plan. In addition, there was no evidence of planned disclosure of work plans for CSO tracking. It was assumed that, given the political transition, prospective mandates and work plans were not available.[189]

[188] Liberia's Open Government Partnership National Action Plan III July 2017 – June 2019. Open Government Partnership. 2017. https://www.opengovpartnership.org/documents/liberia-action-plan-2017-2019.
[189] Interview of Jonathan Williams, Ministry of Information, Culture and Tourism, 11 October 2018.

VI. Methodology and Sources

The IRM reports are written by researchers for each OGP-participating country or entity. All IRM reports undergo a process of quality control to ensure that the highest standards of research and due diligence have been applied.

Analysis of progress on OGP action plans is a combination of interviews, desk research, observation, and feedback from nongovernmental stakeholders. The IRM report builds on the evidence available in Liberia's OGP repository (or online tracker), findings in the government's own self-assessment reports, and any other assessments of process and progress put out by civil society, the private sector, or international organizations. At the beginning of each reporting cycle, IRM staff share a research plan with governments to open a seven-day period of comments or feedback regarding the proposed research approach.

Each IRM researcher carries out stakeholder interviews to ensure an accurate portrayal of events. Given budgetary and calendar constraints, the IRM cannot consult all interested parties or visit implementation sites. Some contexts require anonymity of interviewees and the IRM reviews the right to remove personal identifying information of these participants. Due to the necessary limitations of the method, the IRM strongly encourages commentary during the pre-publication review period of each report.

Each report undergoes a quality-control process that includes an internal review by IRM staff and the IRM's International Experts Panel (IEP). Each report also undergoes an external review where governments and civil society are invited to provide comments on the content of the draft IRM report.

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual.[190]

Interviews and stakeholder input

The IRM interviewed stakeholders to compile this study. The IRM chose subjects based on their documented participation in the MSF, designation as lead and/or support agency within the national action plan, and availability during the time of the study. Interview text was the primary source for this report, with each stakeholder contributing to a part of the report specified below. The IRM conducted fifteen interviews of government and civil society organizations and their OGP-Liberia contacts during the study period.

Organization / Group	Date of Interaction	Format	Interviewees/Topic of Discussion
Accountability Lab	11 October 2018	In-person interview	Anthony Selmah Lawrence Yealue CSO / National Action Plan Context / All Commitments
OGP-Liberia Secretariat	11 October 2018	In-person interview	Ralph Jimmeh and staff OGP / National Action Plan Context / All Commitments
Ministry of Information, Culture and Tourism	11 October 2018	In-person interview	Johnathan Williams OGP Liaison GOV / National Action Plan Context

[190] IRM Procedures Manual, V.3 : https://www.opengovpartnership.org/documents/irm-procedures-manual

Liberia Anti-Corruption Commission	12 October 2018	In-person interview	James Kingsley Program Manager for Education and Prevention Commitment I Commitment VI Commitment VIII Commitment IX
Ministry of Post and Telecommunications	12 October 2018	In-person interview	James K. Sulonteh Title Commitment X
Liberia Extractive Industries Transparency Initiative	16 October 2018	In-person interview	Myer Saye Former staff member / OGP lead Commitment VII
Ministry of Finance and Development Planning	16 October 2018	In-person interview	Johnson Williams, Assistant Director of Budget Development and Dissemination Commitment II Commitment IV
Liberia Land Authority	17 October 2018	In-person interview	Kulmah Jackson and staff Commissioner Commitment VII
Liberia National Police	17 October 2018	In-person interview	Moses Carter and staff Commitment V
Ministry of Justice	17 October 2018	In-person interview	Andrew Nimley Counsellor Commitment IV
Independent Information Commission	18 October 2018	In-person interview	Mark B. Freeman Commissioner Staff Commitment III
Public Procurement Concessions Commission	18 October 2018	In-person interview	Dorbor Jallah Executive Director Commitment VIII
Citizens United to Promote Peace and Democracy in Liberia	19 October 2018	In-person interview	Thomas Yeah Title CSO / National Action Plan Context
Centre for the Advancement of Participatory Democracy and Open Governance	19 October 2018	In-person interview	Domah Cooper Title CSO / National Action Plan Context
Center for Transparency and Accountability in Liberia	30 October 2018	Phone interview	Anderson Miamen Executive Director CSO / National Action Plan Context / All Commitments

Due to a change in government administration since the initial publication of the action plan, several key actors were unavailable for interviews due to new positions, or travel). The IRM researcher contacted but was unable to interview the following people:

- Janet Johnson, Former Governance Commission contact for Commitment I

- Tito (no last name given), Liberian Business Registry for Commitment for Commitment IX
- Andrew Tehmeh, former MICT Deputy Minister Deputy Minister for Administration of the Ministry of Information
- Thomas Nah, formerly of CENTAL and Carter Center Liberia, now Commissioner General / CEO of the Liberian Revenue Authority
- Carter Draper, iLab Liberia
- Ruth Gator, Center for Media Studies and Peace Building
- Klonnious Blamo, Liberia Media Center
- Hh K. Zaizay, Program Director, President's Young Professionals Program

About the Independent Reporting Mechanism

The Independent Reporting Mechanism (IRM) is a key means by which all stakeholders can track OGP progress in participating countries and entities. The International Experts Panel (IEP) oversees the quality control of each report. The IEP is comprised of experts in transparency, participation, accountability, and social science research methods.

The current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Fredline M'Cormack-Hale
- Showers Mawowa
- Juanita Olaya
- Quentin Reed
- Rick Snell
- Jean-Patrick Villeneuve

A small staff based in Washington, DC, shepherds reports through the IRM process in close coordination with the researchers. Questions and comments about this report can be directed to the staff at irm@opengovpartnership.org.

Annex I. Overview of Liberia's performance throughout action plan development

Key:
Green= Meets standard
Yellow= In progress (steps have been taken to meet this standard, but standard is not met)
Red= No evidence of action

Multi-stakeholder Forum	
1a. Forum established: There is a forum to oversee the OGP process	Green
1b. Regularity: The forum meets at least every quarter, in person or remotely	Green
1c. Collaborative mandate development: Members of the forum jointly develop its remit, membership and governance structure.	Red
1d. Mandate public: Information on the forum's remit, membership and governance structure is available on the OGP website/page.	Red
2a. Multi-stakeholder: The forum includes both governmental and non-government representatives	Green
2b. Parity: The forum includes an even balance of governmental and non-governmental representatives	Yellow
2c. Transparent selection: Non-governmental members of the forum are selected through a fair and transparent process.	Green
2d. High-level government representation: The forum includes high-level representatives with decision making authority from government	Green
3d. Openness: The forum accepts inputs and representation on the action plan process from any civil society or other stakeholders outside the forum	Green
3e. Remote participation: There are opportunities for remote participation in at least some meetings and events	Green
3f. Minutes: The OGP forum proactively communicates and reports back on its decisions, activities and results to wider government and civil society stakeholders	Yellow

Key:
Green= Meets standard
Yellow= In progress (steps have been taken to meet this standard, but standard is not met)
Red= No evidence of action

Action Plan Development	
4a. Process transparency: There is a national OGP website (or OGP webpage on a government website) where information on all aspects of the national OGP process is proactively published.	Red
4b. Documentation in advance: The forum shares information about OGP to stakeholders in advance to guarantee they are informed and prepared to participate in all stages of the process.	Yellow
4c. Awareness-raising: The forum conducts outreach and awareness raising activities with relevant stakeholders to inform them of the OGP process.	Green
4d. Communication channels: The government facilitates direct communication with stakeholders to respond to action plan process questions, particularly during times of intense OGP activity.	Green
4e. Reasoned response: The multi-stakeholder forum publishes its reasoning behind decisions and responds to major categories of public comment.	Red
5a. Repository: Government collects and publishes a document repository on the national OGP website/webpage, which provides a historical record and access to all documents related to the national OGP process, including (but not limited to) consultation documents, National Action Plans, government self-assessments, IRM reports and supporting documentation of commitment implementation (e.g. links to databases, evidence of meetings, publications)	Red

***Editorial note**: If a country "meets" the six standards in bold IRM will recognize the country's process as a Starred Process.*