Independent Reporting Mechanism (IRM): Kyrgyz Republic Transitional Results Report 2018–2020

This report was prepared in collaboration with Tatevik Margaryan, independent researcher.

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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 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 progress and determine if efforts have impacted people's lives.

The IRM has partnered with Tatevik Margaryan, independent researcher, to carry out this evaluation. The IRM aims to inform ongoing dialogue around the 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.

This report covers the implementation of the Kyrgyz Republic's first action plan for 2018–2020 and was prepared in July–August 2021. Starting 2021, the IRM implemented a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.[1] The IRM adjusted its Implementation Reports for 2018–2020 action plans to fit the transition process to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic's effects on OGP country processes.

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[1] For more information, see: IRM Refresh, Open Government Partnership, https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/.

II. Action Plan Implementation

The IRM Transitional Results Report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not re-visit the assessments for "Verifiability," "Relevance" or "Potential Impact." The IRM assesses those three indicators in IRM Design Reports. For more details on each indicator, please see Annex I in this report.

2.1. General Highlights and Results

The first national action plan of Kyrgyzstan (Kyrgyz Republic), approved by a government decree in 2018,[1] included 18 commitments covering areas such as judicial openness, public procurement, fiscal transparency, citizen engagement, open data, and other topics relevant for the country. Commitments' implementation varied depending on the lead government agency, funding, and involvement of civil society organizations (CSOs). Overall, out of 18 commitments, seven were either fully or substantially completed, one was not started, and ten saw limited implementation.

Civil society stakeholders interviewed for this report mentioned limited government ownership and commitment during the implementation process. This had several reasons: limited engagement of agencies in commitment design (e.g., in CSO-proposed commitments), cabinet changes that shifted commitment leadership, lack of OGP-awareness by newcomers, and general political and COVID-related challenges.

Commitments with strong ownership from implementing agencies had better implementation and sustainability. For example, Commitment 1 on open data and Commitment 10 on public procurement transparency were initiated by state bodies and substantially implemented, though the resulting data tools need improvement. Commitment 18 on transparent election financing was completed due to the active work of the Central Electoral Committee. Conversely, commitments related to the state judicial acts register, access to archival documents, and disclosure of state property information made limited progress due to a lack of effort, and even resistance, by state bodies.

Commitments with active civil society involvement and donor support also showed progress and saw more public outreach. Milestones in Commitments 11 and 14 related to local self-government budget transparency were promoted by CSOs and received support from the State Agency for Local Self-Government and Interethnic Relations (in 2021, this agency became the State Agency for Regional Development). Support from international organizations also played a key role in implementation, especially for commitments that needed significant financial resources for software and technical assistance. For example, the World Bank supported implementation of the open data commitment. Likewise, the International Center for Non-Profit Law (ICNL) meaningfully contributed to implementing the commitment on civil society assessment of terrorism-financing risks, by providing expertise and field training. UNDP support was also critical for the commitment on election financing transparency, by creating a web platform, building capacity, and raising awareness.

The European Union and USAID assisted with creating a portal for public discussion of draft regulations. This commitment has shown major early results. The new platform publishes draft acts developed by the government and allows public comment. It also allows citizens to present suggestions on amendments to existing legal acts or for developing new ones. Though still in pilot mode, the portal incited advocacy campaigns against some controversial legal drafts, such as an amendment to a law on non-commercial organizations and a draft law on the "guillotine" method of reviewing legislation. If publication of drafts on the platform becomes mandatory for law-making bodies beyond the government, the platform could be a significant tool for participatory policymaking.

Another commitment with major results was the commitment for transparency in election financing and campaigns. This commitment established the regulatory basis for publishing information on election and referendum expenditures, as well as on the income and spending of candidates. A platform was created for publishing reports on election campaign funds, allowing CSOs and citizens to monitor spending and point out any inconsistencies.

Other noteworthy commitments include implementation and promotion of an open data policy, which improved accessibility of government-held information, providing open data format and API access to 646 datasets, although not regularly updated currently. Trainings and discussions organized by the commitment framework helped raise awareness and improve understanding and application of open data concepts. A commitment increasing public procurement transparency made it possible to track the post-tender stage developments and produce procurement reports on selected criteria from the public procurement website. However, access to contract text and post-tender documentation has not been provided yet. The commitment involving civil society's risk assessment of terrorist activities among nonprofits saw progress; civil society-government collaboration developed a risk assessment methodology and implemented a pilot assessment by a joint working group.

In 2019, Kyrgyzstan started the Open Parliament initiative; as a result, eight new commitments were added to the action plan aimed at improving access to information and citizen engagement with parliament.[2] However, the level of implementation and any results from these additional commitments have yet to be seen. Though a working group was formed to prepare and monitor open parliament initiatives, there was limited engagement and motivation by the parliamentarians to implement the plan, and any achievements reported have been mostly due to efforts by international organizations and CSOs, with involvement of a few parliamentarians. Among these eight commitments, two have not been started, four have made limited progress, and two showed substantial progress. The commitments with substantial progress included civil society participation in parliamentary monitoring and evaluation of implementing laws, activities of state bodies accountable to parliament, and stronger interaction between the Jogorku Kenesh (the parliament) and the local communities.

Unlike other countries, the OGP process in Kyrgyzstan is managed by a Secretariat which is an independent body outside of the government, funded by the Organization for Security and Cooperation in Europe (OSCE)—Bishkek Office. This support helped provide a group of full-time experts engaged in the action plan's public relations, monitoring, and coordination. However, weak ownership by the government poses risks to the process' sustainability and enforcement of government participation.

It should be noted that Kyrgyzstan underwent several political challenges after the action plan implementation period, including post-election protests followed by the annulation of parliamentary elections in October 2020, snap presidential elections, and a constitutional referendum changing the political system from the parliamentary system introduced in 2010 back to a presidential system. These developments were accompanied by several changes of the government cabinet, which further affected the action plan implementation and government ownership of OGP processes.

2.2. COVID-19 Pandemic Impact on Implementation

The COVID-19 pandemic negatively affected OGP processes in Kyrgyzstan, including the regular meetings of the National Forum (their multistakeholder forum) and the launch of the co-creation process for the next action plan. National Forum meetings have not occurred since the start of the pandemic, and there were no remote meetings either. However, implementation of the commitments was only moderately affected as most of the implementation processes were already embedded in their enforcing regulations, supported by donors, or in CSO projects. Implementation of several milestones was postponed, particularly those concerning the Ministry of Health and those entailing activities of working groups and committees. Under some commitments, online meetings were organized by CSOs and state agencies to ensure ongoing consultations with civil society as needed.

The significance of, and demand for, open data increased, especially concerning COVID-19 statistics and spending. Many CSOs advocated for transparency in COVID-19 aid and spending.[3] The Ministry of Health[4] added a webpage on COVID-19 that presents statistics on daily cases and information on humanitarian assistance received.[5] Using data provided by the ministry, an NGO, the School of Data, created a portal of open data on COVID-19 where statistics are presented in charts and via downloadable databases.[6]

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[1] Government of the Kyrgyz Republic, Resolution of the Government of the Kyrgyz Republic No 360 (16 Oct. 2018), http://cbd.minjust.gov.kg/act/view/ru-ru/216612.

[2] Government of the Kyrgyz Republic, *National Action Plan on building of the Open Government in the Kyrgyz Republic for 2018-2020* (OGP, 2019), https://www.opengovpartnership.org/wp-content/uploads/2018/12/Kyrgyz-Republic_Action-Plan_2018-2020_REV.pdf.

[3] OGP Kyrgyzstan, "Г.Ускенбаева: Гражданская организация «Открытое правительство» ждет от правительства отчет по внешней помощи на борьбу с COVID-19" [G. Uskenbaeva: The 'Open Government' civic organization expects from the government a report on external assistance to combat COVID-19] (25 May 2020), http://ogp.el.kg/ru/news/guskenbaeva-grazhdanskaya-organizaciya-otkrytoe-pravitelstvo-zhdet-ot-pravitelstva-otchet-po.

[4] In 2021, the Ministry of Health was merged with the Ministry of Labor and Social Development to form the Ministry of Health and Social Development based on Government Resolution No. 38 "On organizational measures in connection with the approval of the new structure of the Government of the Kyrgyz Republic and the reform of the executive authorities of the Kyrgyz Republic" dated 12 February 2021 (http://cbd.minjust.gov.kg/act/view/ru-ru/158019?cl=ru-ru).

[5] See http://www.med.kg/ru/informatsii.html.

[6] See https://opendatacovid.kg/.

2.3. Early Results

The IRM acknowledges that results may not be visible within the two-year time frame of the action plan and that at least a substantial level of completion is required to assess early results. For the purpose of the Transitional Results Report, the IRM will use the Did it Open Government? (DIOG) indicator to highlight early results based on changes to government practice in areas relevant to OGP values. Moving forward, the new IRM results report will not continue using DIOG as an indicator.

Section 2.3 focuses on outcomes from implementation of commitments that had an ambitious or strong design, per the IRM Design Report assessment, or that may have lacked clarity and/or ambition but had successful implementation with "major" or "outstanding" changes to government practice.[1] Commitments considered for analysis in this section had at least a "substantial" level of implementation, as assessed by the IRM in Section 2.4.[2] While this section provides the analysis of the IRM's findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of completion for all the commitments in the action plan.

Commitment 1: Implementation and promotion of open data policy in the Kyrgyz Republic	
Aim of the commitment	This commitment aimed to contribute to the implementation and promotion of an open data policy in the Kyrgyz Republic through the creation of a national open data platform and mechanisms to provide public access to open data. Open datasets in machine-readable format were to be defined in consultation with civil society and made available on the open data portal.
Did it open government? Marginal	The State Committee of Information Technologies and Communications[3] conducted a study to identify categories of requested data.[4] Based on the results, the committee developed a list of requested data and analyzed available databases to identify those for disclosure.[5]
	In collaboration with the state enterprise Info-System, the committee developed and launched an open data portal, www.data.gov.kg, which provides access to open data of state bodies using API protocol. At the time of this report, 646 datasets were available on the portal.[6] The portal offers selection and search of datasets by search criteria, preliminary view of data, and full downloads in four open data formats (.csv, .tsv, .json, and .xml). However, according to civil society, the data is not automatically uploaded from government databases.[7] For example, the recent upload by the Ministry of Education and Science only provides monthly datasets through December 2020 and annual datasets through 2019.[8] The most recent Ministry of Finance datasets are from January 2020, uploaded in February 2020.[9] There is no evidence of monitoring data disclosure by state bodies as planned in the commitment.
	A number of trainings and roundtables on open data were held in 2019 for civil servants and stakeholders to improve the capacity of the government in using open data and the open data portal.[10] In addition, the committee organized hackathons with various initiative groups, international projects, government officials, CSOs, people with disabilities, experts, businesses, IT representatives, and students.[11]
	The committee drafted a legal act to implement the open data initiative[12] and a Concept of Open Data of the Kyrgyz Republic for 2020–2023,[13] but the government had not adopted either by the end of the action plan's implementation period.

	Implementation of most of the milestones within the commitment was funded by the World Bank and the European Bank for Reconstruction and Development (EBRD).[14]
	According to interviewed civil society representatives, the establishment of the open data portal is a step forward in public data disclosure, making it possible to find and download machine-readable data and use API protocol. However, it is necessary to adopt legislation mandating regular uploads and updates of state data.[15] Moreover, datasets need to be expanded beyond the collections already provided on the National Statistical Committee's website; this will meaningfully improve data disclosure.[16] For example, CSOs working on open data suggested including a registry of companies in the Kyrgyz Republic, data on foreign transfers, and crime data; these and other suggestions were not included in the final list of data compiled by the committee.[17]
	Information campaigns, workshops, and trainings for state servants, civil society, and the public contributed to a better understanding and application of open data concepts, resulting in greater demand for open data.[18] Considering the above-mentioned gaps and achievements, the commitment is assessed as having had a marginal change on government practice in advancing access to public information.

Commitment 6: Improving procedure of the draft RLAs' public discussion through creating a Single Electronic Portal (SEP)

Aim of the commitment	This commitment aimed to improve opportunities for civic participation in lawmaking by creating a single electronic portal for public discussion of regulatory legal acts (RLAs) and amending governing legislation to better facilitate public discussion. In particular, amendments were to ensure publication of legislative activity plans and mechanisms for responding to comments, and to account for alternative drafts of normative acts.
Did it open government? Major	The order of the Ministry of Justice of 31 December 2018 approved the composition of the interdepartmental working group to improve the procedure for public discussion of draft regulations and the establishment of a unified electronic portal.[19] The responsibilities of the working group included a review of international public consultation methods and the development of a terms of reference for the portal. The ministry presented the conceptual design of the platform, developed by this group during public hearings organized in April 2019.[20]
	Based on the terms of reference prepared by the working group,[21] the platform was developed, and in December 2019, the ministry held a pilot launch.[22] In August 2020, the government approved a resolution on the portal's operation,[23] which defines the procedure for providing comments and suggestions and responding to them. According to the resolution, ministries, state committees, and administrative departments must publish draft regulatory legal acts on the portal, while other policy-making bodies are recommended to do so. The end of the portal's pilot period (and the enforcement date of the resolution) was set for 1 March 2021 and further extended to 1 January 2022.[24] Starting on this date, the portal will be launched for full operation.[25]
	The ministry raised awareness about the portal through a number of conferences and multistakeholder meetings. In March and September 2020, trainings on using the platform were conducted for representatives of several

government bodies.[26] In December 2020, the Ministry of Justice organized a seminar for CSOs.[27] After the action plan implementation period, several videos were prepared and distributed on social networks, YouTube, and television.[28]

Commitment implementation was supported by the USAID-funded Collaborative Governance Program (implemented by the East-West Management Institute) and the EU-funded program, "Rule of Law in the Kyrgyz Republic—2nd Phase."

Prior to the commitment, legislative drafts from state bodies were published only on the government website[29] with very simplified search options (by number, date, title, and text) and with no possibility for online comments. As a rule, contact data (email or postal address and phone number) of the responsible agency must be provided for submitting comments. However, it was not possible to check whether any comments were provided as they were not published.[30] The new platform provides access to the legal drafts with advanced search possibilities, including by responsible agency, type of legal act, exact date or date range, and current status. In addition, the platform allows visitors to sign up for notification on drafts with selected features, which allows the public to follow legislative initiatives by a specific body or on specific topics without constantly visiting the platform or government websites. Further, the platform allows following the status of drafts and analyzing their history.

The ministry developed amendments to the law on regulatory legal acts to incorporate the electronic platform as an additional tool for public consultations. The government approved these amendments in October 2019 and presented them to parliament for adoption[31] but they have yet to be approved. The amendments do not imply mandatory publication of draft legal acts on the electronic portal, nor mandatory provision of feedback to suggestions. In addition, the amendments do not mention parliament and other policy-makers;[32] they only list state and local self-government bodies as entities publishing draft legal acts on the platform. A new draft law on legal amendments was developed by the government and published for public discussion in April 2021, after the end of the implementation period, mandating public discussion on the portal for all draft regulatory legal acts directly affecting the rights, freedoms, or obligations of citizens and legal entities; or that introduce new regulation of public relations; or that regulate entrepreneurial activity.[33]

If the draft is approved, all law-making bodies will be required to publish draft laws on the portal and provide feedback to comments by a specified time. Currently, the president and the parliament publish drafts they initiate on their respective websites, with an invitation to provide suggestions by phone or email.[34] There is no information whether suggestions are provided or how they are incorporated, and there is no transparency on draft revisions. It should be mentioned that the parliament develops a significant number of draft laws, equal or even more than those developed by the Cabinet of Ministers. On the other hand, due to constitutional amendments approved in the April 2021 referendum, the president now has more power in developing and presenting legislative drafts to the parliament for approval. Many of the drafts already produced by the president are related to constitutional law and are expected to have significant impact.[35]

Considering the availability of draft laws on government websites but the lack of mandatory publication by other law-making bodies, this change in access to information is assessed as marginal.

Regarding civic participation, the change by this commitment is assessed as major. First, the platform created a new opportunity for public comments, with all the comments published along with government responses. As defined by law, a month is provided for the discussion of each draft, and the government body responsible for the draft should provide public feedback within seven working days of any proposal's publication. Between September 2020 and August 2021, 76 legislative drafts and 349 bylaws were posted on the platform for discussion. Ninety-nine suggestions were provided by users, out of which 29 were accepted, 35 received no response, and 6 received delayed responses.[36]

Further, the platform provides opportunity for users to post suggestions on legislation in a separate section, entitled "Citizens' Suggestions."[37] There is a lack of regulation on how suggestions should be considered by the government. At the time of writing the report, 11 suggestions were posted in the platform, dated 30 November 2020 through 25 June 2021, with no feedback from the government. The publications posted in this section of the platform have various formats, such as presenting gaps in a specific law, pointing out the necessity for legislative changes, or a documented analysis of legal gaps in a specific area.

According to one stakeholder, the unified platform serves as an additional tool for the government in considering public opinion on draft laws, as in two disputed drafts published in Spring 2021.[38] One had draft amendments to a law on nonprofit organizations,[39] and most of the suggestions presented on the platform were accepted. The other draft law[40] suggested termination of legislative acts following the "guillotine" process[41] but did not proceed, partly due to raised criticisms. Given the new president's initiative to inventory the legislation of the Kyrgyz Republic,[42] it is expected that a large number of legal acts will be amended in the near future, thus the platform can serve a key role in ensuring public discussion.

At the same time, mandating usage of the platform, requiring other policy-makers to use the platform for public consultations, and requiring detailed feedback for each suggestion will be necessary to achieve significant progress in accessing legal drafts and public participation in law-making. If publication of drafts is stipulated for community-level legal acts, this would be a major step forward for local-level participation as there are no online sources of information on local draft regulations. Additionally, raising awareness needs to continue to attract interest of more CSOs and citizens to use the platform.

Commitment 10: Increasing public procurement transparency

Aim of the commitment	This commitment was to introduce amendments to expand and clarify the list of public procurement data subject to mandatory publication in the open format. The commitment also entailed improving the existing public procurement web portal to make it possible to disclose the full text of contracts and information on contract performance.
Did it open government? Marginal	In 2019, amendments to the public procurement law were adopted to bring the regulations in compliance with international treaties and standards.[43] In December 2020, after the end of the action plan implementation, new amendments were adopted, requiring publication of procurement contracts (excepting confidential and personal data) as well as defining 10-year terms for keeping public procurement data on the public procurement platform.[44]

The Ministry of Finance and the state enterprise, Info-System, developed a database of digitalized contracts, which provides public access to information on contracts, delivery dates, and payments.[45] The full texts of the contracts are not published yet, subject to unfinished technical arrangements. The database on two-stage bidding, project procurement by international organizations, framework agreements, and consulting-service procurement was developed and tested, along with a feedback mechanism.[46] API was developed and incorporated into the public procurement web portal with appropriate documentation for developers.[47]

Though information on delivery and payments is provided, supporting documents (delivery and acceptance notes, payments, invoices) are not yet available as attachments. Currently, the publication of acceptance notes and payments is not mandated by law. To ensure publication of post-tender documents, the Ministry of Finance and USAID-funded consultants analyzed available legislation and drafted amendments to the law on public procurement.[48] However, these amendments are not yet adopted.

At the end of 2018, with support of EBRD, a business intelligence (BI) module for monitoring and reporting on public procurement was developed, and integrated with data sources and the e-procurement portal.[49] However, currently this module is only accessible to the Ministry of Finance, rather than the public. At the same time, API data made it possible for the Open Contracting Partnership to provide BI analysis on their platform, presenting visualized statistics on various aspects of procurement including procurement methods, purchase items, average duration of competition stages, and the number of complaints.[50]

Inquiry forms have been added to the public procurement portal and provide analysis of 16 topics.[51] The reports are produced in Excel format, with a possibility for additional data filters. According to a representative of the Public Procurement Department of the Ministry of Finance (which leads this commitment), stronger server capacity is needed to make it more functional.[52] A 2020 report by Transparency International Kyrgyzstan[53] confirms that the portal is too slow and sometimes fails to load necessary data. Moreover, the organization identified several inconsistencies in the data.[54]

The availability of open data on public procurement helped CSOs and journalists make significant progress in monitoring public procurement.[55] For example, Transparency International Kyrgyzstan used the data to launch Tender Monitoring,[56] a website providing procurement data and flagging corruption risks for each tender. However, the commitment would have more impact in terms of public oversight if it was fully implemented. In particular, publishing contracts would allow more detailed monitoring of contract amounts, procured items, compliance with bidding conditions, procurement plans, and contract templates.[57]

The change in access to information achieved by the commitment is assessed as marginal with potential to improve. Improving would require adopting and implementing the legislation on publishing post-tender documentation, publication of contracts and other relevant information in open data format, availability of full and accurate data, and smooth, uninterrupted operation of the platform.

Commitment 15: Involving civil society in the risks assessment of terrorist activities in non-profit sector	
Aim of the commitment	This commitment aimed to create an approach that would help identify nonprofit organizations (NPOs) at a high risk of financing terrorist activities in order to adopt targeted measures and avoid imposing broad constraints on the nonprofit sector. This commitment was designed in response to the 2018 Mutual Evaluation Report by the Eurasian Group on Combating Money Laundering and Financing of Terrorism, in which Recommendation 8[58] marked nonprofit organizations as non-compliant.[59] The commitment was proposed by CSOs to ensure that the corrective measures taken by the government will not harm the nonprofit sector and risk assessments will be used in fighting terrorism.
Did it open government? Marginal	In December 2018, the State Financial Intelligence Service (SFIS) created a working group to develop methods for assessing the risks of financing terrorist activities in the nonprofit sector.[60] The working group included five CSO representatives and six government representatives. The draft method for identifying high-risk NPOs was developed and posted in the OGP repository in May 2019.[61]
	In June 2019, ICNL organized a seminar of international experts, where methods for assessing nonprofits' risk of financing terrorism were presented and discussed. Based on this, a draft risk assessment method developed by the working group was further revised, discussed with relevant state structures,[62] and presented to the Commission on Combating the Financing of Terrorist Activities and Laundering of Crime Proceeds. However, it has not been officially approved by the time of writing this report.
	In parallel, the government approved a resolution that included creating a Commission on Combating the Financing of Terrorist Activities and Laundering of Crime Proceeds and approving a number of regulations, including one "on the procedure for assessing risks, financing terrorist activities and legalization (laundering) of criminal proceeds."[63] This regulation details the creation and activities of working groups that assess risk in various areas, the procedure for assessing the risks of financing terrorist activities in the nonprofit sector, the assessment results, and the publication of information on the assessment results. Based on the regulation provisions, in October 2019, SFIS created a second multistakeholder working group to assess the terrorism-financing risks in the nonprofit sector.[64] This group involved mainly the same CSO representatives as in the first group, and began assessing nonprofits' risk of financing terrorism based on the draft methodology. A draft report on this assessment is ready and the final report is planned to be presented to Eurasian Group in Autumn 2021.[65]
	Though the commitment has not been fully implemented, the results achieved show successful government-CSO collaboration both in developing the risk assessment methodology and implementing the first assessment. The collaborative work was carried out intensively on a daily basis and was not interrupted, even during the pandemic, as meetings were moved online.[66] SFIS was open to collaboration and respected CSOs' expertise in the field, and the working group could implement its activities in a fluent and collaborative manner. The SFIS representatives participated in various seminars for CSOs organized by ICNL and presented relevant information on combating the financing of terrorism (CFT) measures in Kyrgyzstan.[67] Moreover, the

	collaboration with SFIS extended beyond CFT and covered other issues, such as the recent draft amendments to the law on nonprofit organizations. In addition to the CSOs' involvement in the joint working group, ICNL ensured participation of a larger CSO community through disseminating the draft methodology on risk assessment and the draft report on risk assessment to over 1,200 CSOs.[68] Experts from various types of CSOs were also involved in the process by reviewing draft methodology and providing their opinion on risk assessment for specific nonprofits. The commitment marginally increased civic participation by including CSOs in defining the methodology for assessing terrorism-financing risks of the nonprofit sector. As for access to information, the milestones on publication of information and awareness raising have not been completed; thus the commitment did not result in any changes in this respect.
Commitment 18: Transparency of the financing elections (referendums) and election campaign of candidates, political parties, initiative groups	
Aim of the commitment	The commitment aimed to amend the legislation on disclosing detailed information about state financing of elections and of candidates' and political parties' election campaigns. In addition, the Kyrgyz Central Electoral Commission (CEC)[69] was to develop methodology and manuals on public control of financing referendums and election campaigns, and conduct trainings and awareness-raising events for political parties, CSOs, and the public. Public access to the flow of electoral funds was planned to be provided through the CEC website.
Did it open government? Major	In January 2020, CEC supplemented the guidelines for political party funding of local elections with the requirement that political parties and candidates publish information on the receipt and expenditure of electoral funds on the CEC official website.[70] CEC approved a form for disclosing electoral funds, which includes details on funds received, funds returned to the budget, and expenditures. According to the guidelines, banking institutions provide the CEC with information on the receipt and expenditure of funds from the special account of the election fund, candidate, or political party. As this information becomes available, it is subject to mandatory placement by the CEC on its official website with protections for personal and banking information. (i.e. names of donors and recipients, amounts, and transaction dates are published but passport data, bank accounts, and other personal identification information is hidden). The regulation "on the procedure for the formation, accounting of the receipt and expenditure of funds from the electoral fund of a political party during elections of deputies of the Jogorku Kenesh of the Kyrgyz Republic" was approved by CEC resolution in June 2020.[71] According to this regulation, political parties must submit to the CEC financial reports on the size and all sources of their electoral fund, as well as all costs incurred. As mentioned above, this information is then subject to mandatory posting requirements on the CEC website. In particular, the information must include the date of receipt or expenditure, the name of the donor or recipient (both the legal entity and the individual), the amount of donation or expenditure, and the purpose of the expenditure. Similar provisions were included in regulations related to the electoral funds of presidential candidates[72] and for referendum funds[73] in

October and December 2020 respectively, after the end of the plan's implementation period.

Amendments were made to the regulation "on the activities of the control and audit group at the CEC" by a CEC resolution dated 26 June 2020.[74] According to the amendments, CEC's monitoring and audit group collects data on deposits and expenditures of political party funds and oversees relevant financial reports.

As to ensuring the transparency in state financing of elections, in June 2020, the CEC approved a regulation that requires publication of financial reports by the CEC and election commissions on expenditures for elections and referendums. Publication must be via official sources (e.g., the newspaper, *Erkin Too*) and the CEC website no later than three months after the publication of results for the election or referendum.[75] In July 2020, the CEC website published estimates for the preparation and administration of the 4 October 2020 elections of Jogorku Kenesh KR deputies disaggregated by regions and type of cost.[76] Further, after the action plan implementation period, CEC published information on the expenses for the elections and referendums that took place in October 2020,[77] January 2021,[78] and April 2021.[79]

To promote public access to financial flows of the candidates, a platform (www.talapker.shailoo.gov.kg) was developed, where citizens can learn detailed information on the receipts and expenditures of candidates' and political parties' funds. Information on this portal was disseminated through various media sources. In compliance with the adopted regulations, data on the incomes, expenditures, and financial reports of candidates and parties were published on this platform during the parliamentary elections in October 2020,[80] presidential election in January 2021,[81] and local elections in April and July 2021.[82]

The CEC, together with the Civic Platform under the UNDP-supported Kyrgyzstan Electoral Support Programme,[83] developed training modules on monitoring financial transparency for the public and the media[84] and conducted trainings on public monitoring for CSO representatives and the media across all regions of the Kyrgyz Republic.[85] In addition, online seminars were conducted for representatives of political parties on the new rules for financing election campaigns.[86] News about opening up election financing information was largely communicated through the media.[87]

The necessary legislative, technical, and capacity-building components of the commitment were completed with the aim of ensuring transparency in election and political party financing. This is a step forward in proactive publication of financing information, as previously it was available only upon inquiry, and the pubic was unaware of the accessibility of such information.[88] Combined with the special trainings for CSOs and media, access to new information will help boost analytical work and public oversight of state funding of elections and compliance with the law to provide equal conditions for parties. After publication of the data, the CEC now receives alarm messages from citizens regarding inconsistencies in reported numbers, which helps CEC monitoring. In addition, the political parties and candidates themselves are more accurate in reporting due to better awareness of the legal requirements and the public disclosure of their transactions.[89]

However, the publication of reports on dedicated election funds does not fully provide transparency of political-party spending during campaigns; other resources might be used that are not accounted for in the election fund. Though the use of other resources and in-kind contributions is prohibited by law, it can

	be difficult to find proof of payment for resources, and thus hold noncompliant candidates accountable.[90] Since the commitment significantly improved accessibility to information on election campaign funding and state financing of elections and referendums, the commitment is assessed as bringing about a major change in opening the government.

[1] IRM Design Reports identified strong commitments as "noteworthy commitments" if they were assessed as verifiable and relevant and had "transformative" potential impact. If no commitments met the potential impact threshold, the IRM researcher selected noteworthy commitments from the commitments with "moderate" potential impact. For the list of Kyrgyzstan's noteworthy commitments, see the executive summary of the 2018–2020 IRM Design Report: https://www.opengovpartnership.org/wp-content/uploads/2021/05/Kyrgyz-Republic_Design_Report_2018-2020_EN_for-public-comment.pdf.

[2] The following commitment assessed as noteworthy in Kyrgyzstan's IRM Design Report is not included in this section because it saw limited implementation: Commitment 8: Increase budget transparency.

[3] In 2021, the State Committee of Information Technologies and Communications was transformed into the Ministry of Digital Development.

[4] State Committee of Information Technologies and Communications, *Отчет по исследованию «Определение потребностей и спроса на открытые данные»* [Study Report: Determining Needs and Demand for Open Data] (OGP Repository, Jan. 2019), http://ogp.el.kg/sites/default/files/reports/otchet_gkitis.docx.

[5] State Committee of Information Technologies and Communications, "Информация по исполнению ГКИТиС КР Национального плана действий по построению Открытого Правительства в Кыргызской Республике на 2018-2020 годы" [Information on Implementation of Kyrgyz Republic OGP Action Plan 2018-2020] (OGP Repository, 24 Jan. 2020), http://ogp.el.kg/sites/default/files/reports/otchet_za_yanvar_2020.pdf.

[6] Open Data Kyrgyzstan, "646 найдено массивов данных" [646 datasets found] (accessed 24 Oct. 2021), https://data.gov.kg/dataset.

[7] Bakytbek Satybekov (Alliance on Civic Initiatives Promotion, National Forum Co-Chair), interview by IRM researcher, 13 Jul. 2021.

[8] Open Data Kyrgyzstan, "76 найдено массивов данных" [76 datasets found under Min. of Education and Science] (accessed 24 Oct. 2021), https://data.gov.kg/organization/ministry-of-education.

[9] Open Data Kyrgyzstan, "82 массива найдено" [82 arrays found under Min. of Finance] (accessed 24 Oct. 2021), https://data.gov.kg/organization/ministry-of-finance.

[10] Min. of Digital Development, "Two-day workshop on open data for government agencies to be held in Bishkek" (21 Jul. 2019), http://www.ict.gov.kg/index.php?r=site%2Fproject&pid=403&cid=24; Min. of Digital Development, "Открытые данные — в помощь медицине" [Open data helps medicine] (20 Aug. 2019), http://www.ict.gov.kg/index.php?r=site%2Fproject&pid=430&cid=24; OGP Repository, "Отчет для мероприятия." [Report for the Activity.] (accessed 24 Oct. 2021), http://ogp.el.kg/node/1108.

[11] Min. of Digital Development, "По итогам Хакатона «Ачык Окмот- Жарандар утушу» («Открытые данные для граждан»), были определены победители." [The winners were identified as a result of the hackathon "Achyk Okmot-Zharandar Utushu" ("Open data for citizens")] (17 Dec. 2018), http://www.ict.gov.kg/index.php?r=site%2Fproject&pid=267&cid=24; OGP Repository, "Отчет для мероприятия." [Report for the Activity.] (accessed 24 Oct. 2021), http://ogp.el.kg/node/1328.

[12] Government of the Kyrgyz Republic, *Постановление Правительства Кыргызской Республики «О мерах по внедрению инициативы открытых данных в Кыргызской Республике», Проект* [Draft resolution of the Government of the Kyrgyz Republic "On measures to implement the open data initiative in the Kyrgyz Republic"] (11 Nov. 2019), http://ogp.el.kg/sites/default/files/reports/proekt_zhanny.pdf.

[13] OGP Repository, Концепция открытых данных Кыргызской Республики на период 2020-2023 годы, Проект [Draft Concept of Open Data of the Kyrgyz Republic for 2020–2023] (23 Mar. 2020), http://ogp.el.kg/sites/default/files/reports/2proekt_koncepcii_3.02.20_0.docx.

[14] OGP Repository, "Implementing Open Data Action Plan for the Kyrgyz Republic (План действий по открытым данным)" [Implementing Open Data Action Plan for the Kyrgyz Republic] (accessed 24 Oct. 2021), http://ogp.el.kg/ru/implementing-open-data-action-plan-kyrgyz-republic-plan-deystviy-po-otkrytym-dannym; Min. of Digital Development, "О проекте "Открытые данные"" [About "Open Data" project] (16 Mar. 2018), http://ict.gov.kg/index.php?r=site%2Fproject&pid=61&cid=24.

[15] Satybekov, interview.

[16] *See* National Statistical Committee of the Kyrgyz Republic: http://stat.kg/en/.

[17] Cholpon Uzakbaeva (School of Data Kyrgyzstan), interview by IRM researcher, 4 Aug. 2021.

[18] *Id.*

[19] Min. of Justice, Приказ №249 «Об утверждении состава рабочей группы по улучшению процедуры общественного обсуждения проектов нормативных правовых актов и внедрению единого электронного портала» ["On approval of the composition of the working group to improve the procedure for public discussion of draft regulatory legal acts and the

introduction of a single electronic portal] no. 249 (31 Dec. 2018),
http://ogp.el.kg/sites/default/files/reports/prikaz_o_sozdanii_rabochey_gruppy.pdf.

[20] Min. of Justice, "Министерством юстиции проведено общественное слушание по концепции единого портала проектов нормативных правовых актов" [The Ministry of Justice held a public hearing on the concept of a single portal of draft regulatory legal acts] (19 Apr. 2019), http://minjust.gov.kg/ru/news/view/id/2477/.

[21] OGP Repository, ТЕХНИЧЕСКОЕ ЗАДАНИЕ на разработку единого портала общественных обсуждений проектов нормативных правовых актов Кыргызской Республики, Проект [Draft ToR for the development of a single portal for public discussions of draft regulatory legal acts of the Kyrgyz Republic] (3 Apr. 2019), http://ogp.el.kg/sites/default/files/reports/tehnicheskoe_zadanie_-finalnyy.pdf.

[22] Min. of Justice, "Единый портал общественного обсуждения проектов нормативных правовых актов Кыргызской Республики" [Unified portal for public discussion of draft regulatory legal acts of the Kyrgyz Republic] (accessed 4 Oct. 2021), www.koomtalkuu.gov.kg.

[23] Government of the Kyrgyz Republic, ПРАВИТЕЛЬСТВО КЫРГЫЗСКОЙ РЕСПУБЛИКИ РАСПОРЯЖЕНИЕ [Resolution of the Government of the Kyrgyz Republic] no. 277 (17 Aug. 2020), http://cbd.minjust.gov.kg/act/view/ru-ru/218234/10?cl=ru-ru.

[24] Government of the Kyrgyz Republic, ПРАВИТЕЛЬСТВО КЫРГЫЗСКОЙ РЕСПУБЛИКИ РАСПОРЯЖЕНИЕ [Resolution of the Government of the Kyrgyz Republic] no. 26 on the amendment to Government Resolution no. 277 (12 Feb. 2021), http://cbd.minjust.gov.kg/act/view/ru-ru/218431?cl=ru-ru.

[25] Cabinet of Ministers, "Draft Regulation of the Cabinet of Ministers of the Kyrgyz Republic 'On approval of the Regulation on the procedure for posting and discussing draft regulatory legal acts on the Unified portal for public discussion of draft regulatory legal acts'" (Min. of Justice, 2 Jun. 2021), http://koomtalkuu.gov.kg/ru/view-npa/952.

[26] Min. of Justice, "Для государственных органов проводятся онлайн-тренинги по работе с Единым порталом" [Online trainings for working with the Unified Portal are held for government bodies] (9 Sep. 2020), http://minjust.gov.kg/ru/news/view/id/2808/; Min. of Justice, "Министерством юстиции Кыргызской Республики проведены трехдневные онлайн-тренинги по работе с Единым порталом" [The Ministry of Justice of the Kyrgyz Republic conducted three-day online trainings on working with the Unified Portal] (11 Sep. 2020), http://minjust.gov.kg/ru/news/view/id/2811.

[27] Min. of Justice, "Проведен семинар о Едином портале общественного обсуждения для представителей организаций гражданского общества" [A seminar was held on the Unified Public Discussion Portal for representatives of civil society organizations] (11 Dec. 2020), http://minjust.gov.kg/ru/news/view/id/2895/.

[28] OGP Repository, "Отчет для мероприятия. Информация по обучающим семинарам и информационной компании" [Report for the Activity. Information on training seminars and information campaign] (accessed 24 Oct. 2021), http://ogp.el.kg/node/1676; Min. of Justice, "Единый портал общественного обсуждения проектов нормативных правовых актов Кыргызской Республики" [A unified portal for public discussion of draft regulatory legal acts of the Kyrgyz Republic] (YouTube, 4 Sep. 2020), https://www.youtube.com/watch?v=TxUmw1Ve5gA; Min. of Justice, "Единый портал общественного обсуждения проектов нормативных правовых актов Кыргызской Республики" [A unified portal for public discussion of draft regulatory legal acts of the Kyrgyz Republic] (YouTube, 4 Sep. 2020), https://www.youtube.com/watch?v=nnAtpSAgw4w; Min. of Justice, "Единый портал общественного обсуждения проектов нормативных правовых актов Кыргызской Республики" [A unified portal for public discussion of draft regulatory legal acts of the Kyrgyz Republic] (YouTube, 4 Sep. 2020), https://www.youtube.com/watch?v=zkCFaiMHsUE; Min. of Justice, "Запущен Единый портал общественного обсуждения проектов НПА" [Unified portal for public discussion of draft regulatory legal acts launched] (22 Sep. 2020), https://www.youtube.com/watch?v=Ih16YVFMcFE.

[29] Cabinet of Ministers, "Общественное обсуждение НПА" [Public discussion of the RLA], (accessed 24 Oct. 2021), https://www.gov.kg/ru/npa/c/discussion.

[30] Aida Rustemova (ICNL), interview by IRM researcher, 16 Jul. 2021.

[31] Government of the Kyrgyz Republic, ПРАВИТЕЛЬСТВО КЫРГЫЗСКОЙ РЕСПУБЛИКИ РАСПОРЯЖЕНИЕ [Resolution of the Government of the Kyrgyz Republic] no. 524 on approving the draft law "On amendments to the Law of the Kyrgyz Republic "On regulatory legal acts of the Kyrgyz Republic"" (7 Oct. 2019), http://cbd.minjust.gov.kg/act/view/ru-ru/157137.

[32] According to the law, the following policy-making bodies are endowed with the right to issue normative legal acts: the President, Jogorku Kenesh (parliament), the government, National Bank, Central Election Commission for Elections and Referendum, and representative local self-government bodies. See Min. of Justice, "ЗАКОН КЫРГЫЗСКОЙ РЕСПУБЛИКИ от 20 июля 2009 года № 241 О нормативных правовых актах Кыргызской Республикиarticle" [Law of the Kyrgyz Republic: On normative legal acts of the Kyrgyz Republic] (3 Apr. 2020) art. 5, http://cbd.minjust.gov.kg/act/view/ru-ru/202591?cl=ru-ru. In addition, the new constitution entered into force in May 2021 includes the Supreme Court People's Kurultai and the Prosecutor General as policy-making bodies. Government of the Kyrgyz Republic, КОНСТИТУЦИЯ КЫРГЫЗСКОЙ РЕСПУБЛИКИ [Constitution of the Kyrgyz Republic] (11 Apr. 2021), art. 85, http://cbd.minjust.gov.kg/act/view/ru-ru/112213?cl=ru-ru.

[33] Min. of Justice, "Проект Закона Кыргызской Республики «О нормативных правовых актах Кыргызской Республики»" [Draft Law of the Kyrgyz Republic "On Normative Legal Acts of the Kyrgyz Republic"] (15 Apr. 2021), http://koomtalkuu.gov.kg/ru/view-npa/907.

[34] See Parliament of Kyrgyz Republic, "Общественное обсуждение законопроектов" [Public discussion of draft laws] (accessed 24 Oct. 2021), http://kenesh.kg/ru/article/list/10?page=1; Pres. Of Kyrgyz Republic, "Законопроекты" [Bills] (accessed 24 Oct. 2021), http://www.president.kg/ru/apparat_prezidenta/zakonoproekty.

[35] Aida Rustemova (ICNL), interview by IRM researcher, 4 Oct. 2021.

[36] Min. of Justice, "Портал в цифрах", Единый портал общественного обсуждения проектов нормативных правовых актов Кыргызской Республики [Portal in Numbers, Unified portal for public discussion of draft regulatory legal acts of the Kyrgyz Republic] (accessed 4 Oct. 2021), www.koomtalkuu.gov.kg.

37 Min. of Justice, "Предложения граждан", Единый портал общественного обсуждения проектов нормативных правовых актов Кыргызской Республики [Ciizens' Suggestions, Unified portal for public discussion of draft regulatory legal acts of the Kyrgyz Republic] (accessed 4 Oct. 2021), www.koomtalkuu.gov.kg/ru/offer.

38 Rustemova, interview, 16 Jul. 2021

39 Min. of Justice, "О внесении изменений в Закон Кыргызской Республики «О некоммерческих организациях»" [Draft Law on Amendments to the Law of the Kyrgyz Republic "On Non-Profit Organizations"] (16 Mar. 2021), http://koomtalkuu.gov.kg/ru/view-npa/856.

40 Min. of Justice, "О прекращении действия законодательных актов по принципу «гильотины»" [Draft law on the termination of legislative acts on the principle of "guillotine"] (4 Jan. 2021), http://koomtalkuu.gov.kg/ru/view-npa/877.

41 The guillotine approach "is an orderly, systematic, transparent, rapid and low-cost means of COUNTING and then RAPIDLY REVIEWING a large number of regulations against clear scientific criteria for good regulation, and eliminating those that are no longer needed." Jacobs, Cordova & Associates, "What Is the Regulatory Guillotine" (accessed 24 Oct. 2021), http://regulatoryreform.com/regulatory-guillotine/.

42 Pres. of the Kyrgyz Republic, ПРЕЗИДЕНТ КЫРГЫЗСКОЙ РЕСПУБЛИКИ УКАЗ О проведении инвентаризации законодательства Кыргызской Республики [President of the Kyrgyz Republic Edict on Conducting an inventory of the legislation of the Kyrgyz Republic] (8 Feb. 2021), http://cbd.minjust.gov.kg/act/view/ru-ru/430382.

43 Government of the Kyrgyz Republic, ЗАКОН КЫРГЫЗСКОЙ РЕСПУБЛИКИ О внесении изменений в Закон Кыргызской Республики "О государственных закупках" [Law of the Kyrgyz Republic "On amendments to the Law of the Kyrgyz Republic "On public procurement""] (26 Jun. 2019), http://cbd.minjust.gov.kg/act/view/ru-ru/111923?cl=ru-ru.

44 Government of the Kyrgyz Republic, ЗАКОН КЫРГЫЗСКОЙ РЕСПУБЛИКИ О внесении изменений в Закон Кыргызской Республики "О государственных закупках", [Law of the Kyrgyz Republic "On amendments to the Law of the Kyrgyz Republic "On public procurement""] (18 Dec. 2020), http://cbd.minjust.gov.kg/act/view/ru-ru/112159?cl=ru-ru.

45 See the public procurement web portal: http://zakupki.gov.kg/popp/view/order/centralized_procurement.xhtml.

46 See the Official Public Procurement Portal: http://zakupki.gov.kg/popp/home.xhtml.

47 Min. of Finance, API & Export, http://ocds.zakupki.gov.kg/api-export.

48 OGP Repository, 27.1. Разработать модуль электронного формирования, регистрации и исполнения договоров о закупках [27.1. Develop a module for the electronic formation, registration and execution of procurement contracts] (17 May 2021) (accessed 24 Oct. 2021), http://ogp.el.kg/sites/default/files/reports/27.1._razrabotat_modul_elektronnogo_formirovaniya_registracii_i_ispolneniya_dogovorov_o_zakupkah_2.docx.

49 Coordinating Council of Development Partners in the Kyrgyz Republic, "ЕБРР содействует развитию современной инфраструктуры мониторинга и аудита государственных закупок в Кыргызской Республике" [EBRD promotes development of modern public procurement monitoring and audit infrastructure in the Kyrgyz Republic] (accessed 24 Oct. 2021), http://www.donors.kg/ru/5579-ebrr-sodejstvuet-razvitiyu-sovremennoj-infrastruktury-monitoringa-i-audita-gosudarstvennykh-zakupok-v-kyrgyzskoj-respublike#.Xb2a_5ozY2w.

50 Open Contracting Data Standard et al., "BI анализ государственных закупок OCDS в Кыргызской республике" [BI analysis of public procurement OCDS in the Kyrgyz Republic] (accessed 24 Oct. 2021), https://bi.open-contracting.org/kyrgyzstan/.

51 Min. of Finance, "Procurement reports" (accessed 24 Oct. 2021), http://zakupki.gov.kg/popp/view/services/statistics/report_new_main.xhtml.

52 Nursultan Sharsheyev (Min. of Finance), interview by IRM researcher, 28 Jul. 2021.

53 Transparency International Kyrgyzstan, КОРРУПЦИОННЫЕ РИСКИ НА ЭТАПАХ ГОСУДАРСТВЕННЫХ ЗАКУПОК [Corruption risks at the stages of public procurement] (Bishkek: 2020), https://www.transparency.kg/files/pdf/Public%20Procurement%20Report%20-%20TI%20Kyrgyzstan.pdf.

54 Antonina Horoshman (Transparency International Kyrgyzstan), interview by IRM researcher, 3 Aug. 2021. For *Compare* data, see the Report on Public Procurements for 2020, available at Отчеты по закупкам [Procurements Reports], http://zakupki.gov.kg/popp/home.xhtml?cid=2; with statistics for 2020 in the analytical section of the portal, http://ocds.zakupki.gov.kg/statistic/procedures, and data on 2020 in chart format on the portal homepage, http://zakupki.gov.kg/popp/ (accessed 3 Aug. 2021).

55 Sophie Brown, "How data-savvy journalists in Kyrgyzstan are using open contracting to investigate corruption in public procurement" (Open Contracting Partnership, 16 Dec. 2019), https://www.open-contracting.org/2019/12/16/how-data-savvy-journalists-in-kyrgyzstan-are-using-open-contracting/.

56 Tender Monitor, "О нас" [About us] (Transparency International Kyrgyzstan, 24 Oct. 2021), http://tender.transparency.kg/.

57 Antonina Horoshman (Transparency International Kyrgyzstan), electronic communication with IRM researcher, 6 Aug. 2021.

58 Recommendation 8 of the Financial Action Task Force (FATF) requires that the laws and regulations that govern non-profit organisations be reviewed so that these organisations cannot be abused for the financing of terrorism. See more at: "Best Practices on Combating the Abuse of Non-Profit Organisations," Financial Action Task Force, https://www.fatf-gafi.org/documents/documents/bpp-combating-abuse-npo.html.

59 Eurasian Group on Combating Money Laundering and Financing of Terrorism, Отчет Взаимной оценки Кыргызской Республики [Mutual Evaluation Report on Kyrgyz Republic] (2018), https://bit.ly/3CmTRVw.

60 State Financial Intelligence Service, Приказ о создании рабочей группы для внедрения методологических подходов к оценке рисков финансирования террористической деятельности в секторе некоммерческих организаций [Order of the State Financial Intelligence Service of the Government of the Kyrgyz Republic No 139 on creating a working group to develop

methodological approaches to assessing the risks of financing terrorist activities in the nonprofit sector] (20 Dec. 2018), http://ogp.el.kg/sites/default/files/reports/prikaz_gsfr_rg.pdf.

[61] OGP Repository, "Отчет для мероприятия." [Report for the Activity] (accessed 24 Oct. 2021), http://ogp.el.kg/node/760.

[62] OGP Repository, "Отчет для мероприятия." [Report for the Activity] (accessed 24 Oct. 2021), http://ogp.el.kg/node/1083.

[63] Cabinet of Ministers, ПОЛОЖЕНИЕ о порядке проведения оценки рисков финансирования террористической деятельности и легализации (отмывания) преступных доходов [Regulation of the Government of the Kyrgyz Republic on the procedure for assessing risks, financing terrorist activities and legalization (laundering) of criminal proceeds] no. 606 (25 Dec. 2018), http://cbd.minjust.gov.kg/act/view/ru-ru/12936.

[64] State Financial Intelligence Service, Приказ о создании рабочей группы для проведения оценки рисков финансирования террористичекой деятельности в секторе некоммерческих организаций [Order of the State Financial Intelligence Service of the Government of the Kyrgyz Republic on creating a working group to assess the terrorism financing risks in the nonprofit sector] no. 60 (15 Oct. 2019), http://ogp.el.kg/sites/default/files/reports/prikaz_rabochaya_gruppa_po_provedeniyu_or_ft_v_sektore_nko.pdf.

[65] Nookat Idrisov (ICNL), interview by IRM researcher, 13 Jul. 2021.

[66] Id.

[67] OGP Kyrgyzstan, "Новости: В Бишкеке прошел трехдневный семинар по совместной оценки рисков финансирования терроризма в секторе НКО" [News: Bishkek hosted a three-day seminar on joint assessment of terrorist financing risks in the NGO sector] (5 Jul. 2019), http://ogp.el.kg/ru/news/v-bishkeke-proshel-trehdnevnyy-seminar-po-sovmestnoy-ocenki-riskov-finansirovaniya-terrorizma-v.

[68] Id.

[69] The official name for CEC is the Central Commission on Elections and Referenda of the Kyrgyz Republic.

[70] Central Electoral Commission, 22.01.2020. №10 О внесении изменений в Инструкцию «О порядке формирования, учета поступления и расходования денежных средств избирательного фонда кандидатов, политической партии при проведении выборов депутатов местных кенешей Кыргызской Республики», утвержденную постановлением Центральной комиссии по выборам и проведению референдумов Кыргызской Республики от 11 октября 2016 года № 154 [On amendments to the Instruction "On the procedure of formation, accounting of the receipt and expenditure of funds from the electoral fund of candidates and a political party during elections of deputies of local keneshes of the Kyrgyz Republic" approved by the Resolution No.154 of the Central Commission on Elections and Referenda of the Kyrgyz Republic dated 11 October 2016] (22 Jan. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/22012020-10/.

[71] Central Electoral Commission, 26.06.20г. №112 Положение о порядке формирования, учета поступления и расходования денежных средств избирательного фонда политической партии при проведении выборов депутатов Жогорку Кенеша Кыргызской Республики [26.06.20 No112 Regulations on the procedure for formation, accounting for receipt and expenditure of funds of the electoral fund of a political party during the elections of deputies of the Jogorku Kenesh of the Kyrgyz Republic] (26 Jun. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/112/.

[72] Central Electoral Commission, 29.10.2020 г. №279 О Положении о порядке формирования, учета поступления и расходования денежных средств избирательного фонда кандидата на должность Президента Кыргызской Республики [29.10.2020 No. 279 On the Regulations on the procedure for forming, accounting for the receipt and expenditure of funds of the election fund of a candidate for the post of President of the Kyrgyz Republic] (29 Oct. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/279/.

[73] Central Electoral Commission, 19.12.2020 №483 О Положении «О порядке формирования, учета поступления и расходования денежных средств фондов референдума (групп «за»,групп «против»)» [19.12.2020 No. 483 On the Regulation "On the procedure for the formation, accounting of receipt and expenditure of funds of the referendum funds (groups "for", groups "against")"] (19 Dec. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/19122020-483-o-polozhenii-o-poryadke-formirovaniya-ucheta-postupleniya-i-rashodovaniya-denezhnyh-sredstv-fondov-referenduma-grupp-zagrupp-protiv/.

[74] Central Electoral Commission, 26.06.20г. №113 О внесении изменений в Положение «О деятельности КРГ при Центральной комиссии по выборам и проведению референдумов Кыргызской Республики», утвержденное постановлением Центральной комиссии по выборам и проведению референдумов Кыргызской Республики от 14 июня 2017 года № 157 [26.06.20 No. 113 On Amendments to the Regulation "On the Activities of the KRG under the Central Commission for Elections and Referendums of the Kyrgyz Republic", approved by the resolution No 157 of the Central Commission for Elections and Referendums of the Kyrgyz Republic on 14 June 2017] (26 Jun. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/113/.

[75] Central Electoral Commission, 26.06.20г. №114 О Положении о порядке финансирования, учета и отчетности по денежным средствам, выделенным из республиканского бюджета ЦИК КР, территориальным и участковым избирательным комиссиям Кыргызской Республики [26.06.20 No114 On the Regulations on the procedure for financing, accounting and reporting on funds allocated from the republican budget of the CEC of the Kyrgyz Republic to territorial and precinct electoral commissions of the Kyrgyz Republic] (26 Jun. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/114/.

[76] Central Electoral Commission, 17.07.20 г. №134 Об утверждении сметы расходов на подготовку и проведение выборов депутатов Жогорку Кенеша Кыргызской Республики, назначенных на 4 октября 2020 года [17.07.20 No. 134 On approval of the cost estimate for the preparation and conduct of elections of deputies of the Jogorku Kenesh of the Kyrgyz Republic scheduled for October 4, 2020] (17 Jul. 2020), https://shailoo.gov.kg/ru/npacik/Postanovleniya_CIK_KR-BShKnyn_toktomdoru/134-170720-ob-utverzhdenii-smety-rashodov-na-podgotovku-i-provedenie-vyborov-deputatov-zhogorku-kenesha-kyrgyzskoj-respubliki-naznachennyh-na-4-oktyabrya-2020-goda/.

77 Central Commission on Elections and Referenda of the Kyrgyz Republic, Отчет Центральной комиссии по выборам и проведению референдумов Кыргызской Республики «О расходовании средств республиканского бюджета, выделенных на подготовку и проведение выборов депутатов в Жогорку Кенеш Кыргызской Республики, назначенных на 04.10. 2020 года» [Report of the Central Commission for Elections and Referendums of the Kyrgyz Republic "On the spending of funds from the republican budget allocated for the preparation and conduct of elections of deputies to the Jogorku Kenesh of the Kyrgyz Republic, scheduled for 04.10.2020"], (accessed 27 Oct. 2021), https://www.shailoo.gov.kg/media/askar/2021/06/27/2020-26062021_27-_.pdf

78 Central Electoral Commission, Отчет Центральной комиссии по выборам и проведению референдумов Кыргызской Республики о расходовании средств республиканского бюджета, выделенных на организацию и проведение досрочных выборов Президента Кыргызской Республики назначенных на 10.01.2021 года [Report of the Central Commission for Elections and Referendums of the Kyrgyz Republic "On the spending of funds from the republican budget allocated for the preparation and conduct of on the organization and conduct of the early elections of the President of the Kyrgyz Republic scheduled for 10.01.2021] (accessed 24 Oct. 2021), https://shailoo.gov.kg/media/askar/2021/06/01/10012021-31052021-_1.pdf; Central Electoral Commission, Отчет Центральной комиссии по выборам и проведению референдумов Кыргызской Республики о расходовании средств республиканского бюджета, выделенных на организацию и проведение референдума (всенародного голосования) Кыргызской Республики, назначенных на 10.01.2021 года [Report of the Central Commission for Elections and Referendums of the Kyrgyz Republic "On the spending of funds from the republican budget allocated for the preparation and conduct of on the organization and conduct of the referendum (popular vote) of the Kyrgyz Republic, scheduled for 10.01.2021"] (accessed 27 Oct. 2021), https://www.shailoo.gov.kg/media/askar/2021/06/01/10012021-21042021-_1.pdf.

79 Central Electoral Commission, "Финансирование организации и проведения выборов из средств республиканского бюджета" [Elections of deputies of the local keneshes of the Kyrgyz Republic on April 11, 2021, Financing of the organization and conduct of elections from the republican budget] (accessed 24 Oct. 2021), https://www.shailoo.gov.kg/media/askar/2021/06/20/11042021-10062021-_20.pdf; Central Electoral Commission, "Финансирование организации и проведения референдума из средств республиканского бюджета" [Referendum (popular vote) of the Kyrgyz Republic on April 11, 2021, Financing of the organization and conduct of the referendum] (accessed 25 Oct. 2021), https://www.shailoo.gov.kg/media/ulan/2021/06/02/11042021-31052021.pdf.

80 Central Electoral Commission, "Выборы депутатов Жогорку Кенеша Кыргызской Республики" [Elections of deputies of the Jogorku Kenesh of the Kyrgyz Republic on October 04, 2020] (accessed 25 Oct. 2021), https://talapker.shailoo.gov.kg/ru/prev/3.

81 Central Electoral Commission, "Досрочные выборы Президента Кыргызской Республики" [Early elections of the President of the Kyrgyz Republic on January 10, 2021] (accessed 25 Oct. 2021), https://talapker.shailoo.gov.kg/ru/presidential.

82 Central Electoral Commission, "Выборы депутатов городских кенешей Кыргызской Республики" [Elections of deputies of the city keneshes of the Kyrgyz Republic on April 11, 2021] (accessed 25 Oct. 2021), https://talapker.shailoo.gov.kg/ru/prev/14.

83 UNDP Kyrgyzstan, "Kyrgyzstan Electoral Support Programme" (accessed 25 Oct. 2021), https://www.kg.undp.org/content/kyrgyzstan/en/home/projects/kyrgyzstan-electoral-support-programme.html.

84 Civic Platform, СБОРНИК МАТЕРИАЛОВ ДЛЯ НКО: МОНИТОРИНГ ФИНАНСИРОВАНИЯ ИЗБИРАТЕЛЬНЫХ КАМПАНИЙ [Sourcebook for non-commercial organizations for monitoring financing of election campaigns] (2020), https://platforma.kg/wp-content/uploads/2020/10/NKO_Web.pdf; Civic Platform, СБОРНИК МАТЕРИАЛОВ ДЛЯ СМИ: МОНИТОРИНГ ФИНАНСИРОВАНИЯ ИЗБИРАТЕЛЬНЫХ КАМПАНИЙ [Sourcebook for media for monitoring financing of election campaigns] (2020), https://platforma.kg/wp-content/uploads/2020/10/SMI_Web.pdf.

85 Civic Platform, "Тренинги в регионах для СМИ" [Trainings in the regions for the media] (26 Aug. 2020), https://platforma.kg/our-priorities/election/treningi-v-regionah-dlya-smi/; Civic Platform, "Тренинги в регионах для представителей НКО" [Trainings in the regions for the NGO representatives] (26 Aug. 2020), https://platforma.kg/our-priorities/parliamentarism-in-kr/treningi-v-regionah-dlya-predstavitelej-nko/.

86 Civic Platform, "ОФ «Гражданская платформа» совместно с ЦИК провели третий обучающий онлайн семинар для политических партий" [PF "Civic Platform" together with the CEC held the third online training seminar for political parties] 6 Aug. 2020), https://platforma.kg/our-priorities/election/of-grazhdanskaya-platforma-sovmestno-s-tsik-proveli-tretij-obuchayushhij-onlajn-seminar-dlya-politicheskih-partij/.

87 News of Kyrgyzstan, "Выборы-2020. ЦИК разместит всю информацию о кандидатах на портале talapker.kg" [Elections 2020. The CEC will post all information about the candidates on the talapker.kg portal, 24.kg (17 Aug. 2020), https://24.kg/obshestvo/162673_vyiboryi-2020_tsik_razmestit_vsyu_informatsiyu_okandidatah_naportale_talapkerkg/; Marlim, "Информация о кандидатах будет размещена на портале talapker.kg - ЦИК" [CEC – The information about the candidates will be posted on the talapker.kg portal] (Koom Press, 17 Aug. 2020), https://koom.press/ru/informacziya-o-kandidatah-budet-razmeshhena-na-portale-talapker-kg-czik/; Elgezit, "Со списками кандидатов и программами партий можно ознакомиться на портале «Талапкер»" [The lists of candidates and party programs can be found on the Talapker portal] (19 Sep. 2020), https://elgezit.kg/2020/09/19/so-spiskami-kandidatov-i-programm-partij-mozhno-oznakomitsya-na-portale-talapker/.

88 Raida Bashirova (CEC consultant), interview by IRM researcher, 10 Aug. 2021.

89 Id.

90 Horoshman, interview; Bashirova, interview.

2.4. Commitment Implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

Commitment	What did the commitment achieve? Completion: *(no evidence available, not started, limited, substantial or complete)*
1. Implementation and promotion of open data policy in the Kyrgyz Republic	**Substantial** For details regarding the implementation and early results of this commitment, see Section 2.3.
2. Open data in the education system at the level of state general education organizations	**Limited** In 2019, the web portal www.isuo.edu.gov.kg provided data on financial and non-financial indicators for educational organizations, though not all educational institutions were involved and open data format was not provided. However, in 2020, the EMIS was not fully functional due to its revision and redesign with the support of UNICEF.[1] Open data on educational institutions is now published at https://public.edu.gov.kg/.[2] According to the draft self-assessment report, in the last quarter of 2020 (after the implementation period), the Ministry of Education and Science incorporated software for disclosing information in open data format, and data for 90% of schools was put into the system.[3] Within the framework of a project funded by the Asian Development Bank (ADB), an institution, Zhagy Kitep, was created in 2018 to improve the provision of textbooks to general education students by renting textbooks and publishing new textbooks with the collected funds. This institution's website (www.kitep.org.kg) has an automated information system, where all schools (except for boarding schools, special schools, and private schools) are expected to provide data on textbook rent. A draft template was developed for publishing how many textbooks are rented out and the usage of rent funds disaggregated by region, instruction language, and class.[4] However, at the time of this report, the website did not publish any information on the textbooks, teaching materials, or the school reports on textbook rent data as expected by the second milestone of the commitment. Also incomplete are milestones on disclosure of data about the qualification level of public education establishments' specialists and on ensuring access to information about safety in public education.
3. Open data about the activities of Health Organizations (HOs)	**Limited** A regulation on the open data portal of the Ministry of Health was approved by an order of the Minister of Health, No. 1116.[5] The list of data to be published on the platform was adopted by the ministry in May 2019.[6] The abovementioned order regulates publication of data on www.opendata.med.kg. However, this platform presents the same datasets as www.data.gov.kg, with the exception of one additional dataset on COVID-19. The available data is not differentiated by health organizations as planned in the commitment. It does not include financial indicators mentioned in the list of data approved by the ministry.

	According to the government's draft self-assessment, the platform is not integrated with the accounting system of the Ministry of Health. Collecting data is not fully automated, which makes the publication of data a time-consuming process. The ministry did not adopt any regulation on the data collection which would define the format of the data and its interconnectivity with accounting software.[7]
4. Modernization of the state judicial acts register	**Limited** The Information Technology Institution under the Judicial Department of the Supreme Court of the Kyrgyz Republic, Adilet Sot, together with the developers of the court information system, developed an application for automatic uploading of case registration data and the court schedule from the Court Information System onto the State Register of Judicial Acts (www.act.sot.kg).[8] According to the government self-assessment, it was found that due to certain systematic shortcomings, data input is not automated yet. Any change in a document in the system requires the creation of an additional copy. There is no function for printing out a document directly from the system; it must be downloaded first, and when downloading a document, the text loses its structure. The services for the automatic upload and publication of judicial acts were piloted on test platforms and deficiencies in data transfers are addressed. A module was created for the de-personification of judicial acts by keywords. However, some published acts on www.act.sot.kg still have personalized initials remaining.[9] According to one report, the process of de-personalization is not feasible due to a lack of standardized and machine-readable data in court systems.[10] To enable contextual and keyword searches of judicial acts, and integration with relevant software, the reference books of the platform were brought in line with the reference books of the Automated Information System of the Court and the Unified Register of Crimes and Misdemeanors. Articles were updated according to the new Criminal Code and the Criminal Procedure Code.[11] The abovementioned report noted a "lack of political will and appropriate budgeting" for the full implementation of the commitment. The report concludes that as the OGP action plan was adopted by the government, there is no mechanism to enforce the implementation of the commitment by judicial bodies.[12]
5. Ensuring public access to archival documents (dated 1918 – 1953)	**Limited** An interdepartmental working group was created on 31 December 2018 to draft changes and amendments to regulations on access to archival documents.[13] Based on legislation analysis, the working group concluded that the current law "On the National Archival Fund of the Kyrgyz Republic" meets all the existing requirements for publicity, accessibility, and protection of personal information, and no changes are needed.[14] According to the law on the National Archive Fund, restrictions on using archived documents containing state, commercial, or official secrets are established for a period of up to 30 years from the time of their creation.[15] However, access to documentation of state security bodies is provided only after 75 years, which does not cover the period up to 1953 as mentioned in the commitment.

	In September 2019, with support of Soros Foundation-Kyrgyzstan and the Civil Initiative of Internet Policies, parliament members organized a roundtable to discuss amendments to the legislative acts, which among other issues, aimed at facilitating access to the documents on victims of political repression.[16] However, no amendments were adopted by the end of action plan implementation.
	The State Registration Service responsible for the commitment collected data on the number of persons and documentation to be declassified from state agencies and estimated the funding needed for digitalizing the data.
	With the support of Soros Foundation-Kyrgyzstan and Civil Initiative of Internet Policies, the state enterprise, Infocom, developed an electronic archive on persons repressed and "rehabilitated" between 1918 and 1953, based on information available in the archives.[17] The system is being tested and a list of 17,338 victims have been moved to this new archive. It has a search and analysis function; however, there is no public access to digitalized documents that are already declassified, and the list of the repressed persons is not complete.
6. Improving procedure of the draft RLAs' public discussion through creating a Single Electronic Portal (SEP)	**Substantial** For details regarding the implementation and early results of this commitment, see Section 2.3.
7. Involving civil society in the fight against corruption in the state bodies	**Limited** An order of the Prime Minister dated 19 February 2019 approved a new composition of the government's anticorruption council to include representatives of state bodies and civil society.[18] The order was adopted without any public consultation, and according to the draft self-assessment, the criteria for selecting group members does not follow the statutory requirements of the council adopted by the government.[19] In June 2019, Result NGO developed a guide on alternative monitoring of government bodies' anticorruption plans within the framework of the project on Public Monitoring of Anti-Corruption Activities of State Bodies, carried out as a part of the USAID-funded Partnership for Innovation - P4I program, implemented by the Civil Society Development Association (ARGO).[20] The guide was discussed with CSOs and state bodies[21] and approved by the OGP national forum in February 2020.[22] Result also trained 40 CSOs on conducting alternative monitoring by using the guidelines.[23] Remaining incomplete are milestones on regular monitoring of anticorruption activities of state bodies, raising public awareness of combating corruption, and assessing corruption in government agencies.
8. Increase budget transparency	**Limited** The commitment planned to create a new module on the Open Budget portal of the Ministry of Finance for collection and publication of the government budget reporting data and an online mechanism for consultation with stakeholders. However, modernization of the Treasury's information system made it incompatible with the Open Budget portal.

	Thus the portal was not updated in January 2019, and the need for a new portal was identified.
	In March 2020, the Ministry of Finance developed and approved terms of reference for a new platform.[24] The new portal was launched in June 2020.[25] It is automatically updated with data from the Treasury's system and presents data by state agency, territorial departments, and individual recipients within a selected timeframe. The information is provided both in charts and tables, but there is no download function for machine-readable data. Apart from the visualization feature, the portal largely provides the same information as the old portal functioning up to 2018.[26]
	Under the milestone on engaging citizens in the budgeting process, the Ministry of Finance launched an online feedback section on its website.[27] As of writing this report, there was only one question that had a ministry response and another one with no response. It is unclear how this new option will impact the budgeting process. There is no evidence of raising awareness of this new option.
	The draft national budget for 2020 was discussed by the Ministry of Finance at public hearings on 6 September 2019, [28] and laws regarding the budget were published on the ministry's website a day before public hearings.[29] In 2020, the draft budget for 2021 was discussed online.[30] However, there is no indication the ministry's online feedback option was used during budget consultations. Given that public budget hearings were conducted previously, no improvement is observed in citizen participation in budgeting process.
9. Creating multilateral platform for managing external assistance	**Limited**
	The website, http://www.amp.gov.kg/, which displayed information on donor assistance, no longer functions. According to the Ministry of Economy, there was a lack of hosting and funding sources for the expansion and maintenance of website.[31]
	A March 2020 government resolution allocated funds for a number of activities under the government program, Digital Economy, including a system of automated registration of external aid, which was planned to be developed by 1 October 2020.[32] However, the resolution does not mention whether an existing platform will be used to operate the system, and whether the information will be accessible to the public. According to the draft government self-assessment, since the AMP website didn't function, the Ministry of Finance decided in April 2021 to use another website (http://donorhelp.okmot.kg), which was created for monitoring COVID-19 aid.[33]
	With the support of OSCE, consultants drafted a guide for public monitoring of external aid projects, which was publicly discussed and can assist state bodies. [34]
	The activities within the milestone on public involvement in the planning and implementation of donor-funded projects were not completed within the implementation period.
10. Increasing public procurement transparency	**Substantial**
	For details regarding the implementation and early results of this commitment, see Section 2.3.

11. Ensuring budget transparency of the local budgets and consideration the interests of local communities in the budget process	**Substantial**
	The Ministry of Finance created a working group to monitor and assist implementation of this commitment. This group concluded that the ministry's Methodological Guidelines for Conducting Public Hearings on Local Budgets of the Kyrgyz Republic[35] needed to be approved by government decree. This could be accomplished by adopting amendments to the Budget Code that were passed in the first reading of the parliament.[36] However, there is no further progress by the time of writing this report.
	In September 2019, the government developed and approved a method for assessing budget transparency in the municipal index.[37] Guidelines on developing local citizen budgets were approved in February 2021,[38] after the implementation period.
	In May–June 2019, the Development Policy Institute, with funding from the Swiss government, trained representatives from territorial administrations on organizing public hearings and citizen budgets. According to their report, in 2019, public hearings on local budgets were organized by 330 local governments, which raised awareness on the opportunities for civic participation in local budget processes. About 52% of citizen proposals presented during those public hearings were considered by governments. Moreover, about 70% of citizens were satisfied with the participation opportunities in public hearings on local budgets.[39]
	The Ministry of Finance developed a web application that will allow citizens to receive information on drafts and approved versions of local budgets, as well as budget execution reports, in a user-friendly format, with a list of specific information.[40] Twenty-eight percent of local governments posted budget information through this application.[41]
	Terms of reference for local budget information system were developed in 2021 (after the implementation period) but not approved by the time of writing this report. This system will disclose all community-budget data, including information on targeted and equalizing transfers and their calculations.[42]
	The milestone on coordinating local communities and the state on inter-budgetary relations aimed to incorporate local interests in the national budget, was not completed. In July 2021, almost a year after the implementation period, the Cabinet of Ministers adopted a resolution to approve draft amendments to the Budget Code, which introduce a mechanism for considering the interests of local self-government bodies while preparing and adopting the national budget.[43]
	Since the major milestones related to civic participation in local budgeting have been mostly completed, the commitment implementation is assessed as "substantial."
12. Improving access to information of state and municipal authorities	**Not started**
	The Organization for Security and Cooperation in Europe (OSCE) Program Office in Bishkek plans to hire a consultant to develop a package of relevant legal acts.[44]
13. Calculation of rate of public	**Completed**

assurance in local authorities	On 27 July 2020, the government approved amendments to a resolution on assessing activities of state executive bodies, municipalities of Bishkek and Osh cities and their heads, and regional government representatives, in order to include local self-government in the Population Confidence Index.[45] According to the amendments, for the purpose of the index, the National Institute of Strategic Studies will assess local self-government bodies separately from regional state administrations.
	In line with the new regulation, the National Institute of Strategic Studies conducted further surveys, assessing local governments by regions (starting in the second half of 2020).[46] According to the results, confidence in local governments varies from 26.8 (Chuy region) to 56.7 (Batken region) on the scale of -100 to 100.
14. Disclosure of information about state and municipal property	**Limited**
	The State Property Management Fund opened limited public access to the register of state property on https://fgi.gov.kg/state-property.[47] According to the draft self-assessment, the available statistics on the assets of each state body are incomplete, which does not allow full public oversight of state property. The limited data is justified by "the state bodies being assets of strategic importance," though the Law on Strategic Objects mentions that only administrative buildings of state bodies are considered "strategic objects."[48]
	The website of the State Agency for Regional Development[49] contains only cumulative information on the composition of municipal assets by region and by category.[50] The State Property Management Fund shared registry software with the agency, however, more technical and financial resources are needed for a designated server and adapted software.[51] This is a challenging task that needs resolution of several practical and legal issues to collect information from a large number of municipalities and enforce publishing and updating information on each property item[52] (currently there are 484 local government bodies in the Kyrgyz Republic).[53]
	In September 2018, the State Property Management Fund launched a system for holding online auctions of state rental property: https://etp.okmot.kg/fugi/.[54] Auction results are not published.
	The electronic trading platform for municipal assets, https://etp.okmot.kg/msu/, functions separately on the same website. A government resolution adopted in 2019[55] recommended that local self-government bodies electronically organize rental properties. Legislative amendments will be needed for enforcing the use of an electronic trading portal for local self-government bodies.
	With support of CSOs, the State Agency for Regional Development disseminated information on the portal and trained representatives of local government involved in the pilot program.[56]
15. Involving civil society in the risks assessment of terrorist activities in nonprofit sector	**Substantial**
	For details regarding the implementation and early results of this commitment, see Section 2.3.
16. Disclosure of related data in	**Substantial**

mining industry at the license level	In April 2019, the State Committee of Industry, Energy and Subsoil Use[57] approved the composition of a working group on increasing transparency in the mining industry.[58] The working group analyzed local communities' and governments' needs for mining industry information,[59] sent a list of needed information to government agencies, and wrote a summary of needed information for the committee's website.[60] The working group refined the list and published it on the website of the State Committee of Industry, Energy and Subsoil Use, with a note that it would be discussed with and agreed upon by other state bodies. Needed data includes information on beneficial owners of the license holder, the terms of license, employment data, plans for mitigating environmental impacts, and economic indicators, including the budget allocated for regional development.[61]
	Consultants from the Forum on Official Assistance on Development, a CSO involved in the OGP National Forum, have drafted amendments to the order of the State Committee for Industry, Energy, Subsoil Use of the Kyrgyz Republic "On Improving the Reporting Processes of Subsoil Users,"[62] including the list of data to be published, along with the timeline, format, and channels of publication. Prior to finalizing the amendments, the list of needed data was sent to relevant state entities for comments and feedback; as a result, some categories originally included in the summary of needed information were removed.[63] However, there is no evidence of approval of the amendments or initiation of other relevant amendments to ensure publication of the needed data. Information on licenses has been published on the committee's website in a table format.[64] The committee negotiated with USAID on the possibility of collecting and publishing data from licenses through the information system, Nedra, software for subsoil data management; terms of reference are being developed for this system.[65]
17. Implement an auditing system with public participation	**Limited** Consultants from the Forum for Official Development Assistance developed draft regulations for including public participation in audits.[66] On 14 January 2020, the Chamber of Accounts trained their staff, CSO representatives, and members of the National Forum of the Open Government on public participation in audits. The training was supported by the USAID Joint Governance Program in the Kyrgyz Republic.[67] As a result of the training, both CSOs and chamber staff gave comments on the draft regulations. Considering this feedback, the consultants finalized the draft regulation and developed a draft Methodological Manual on Audit with Public Participation.[68] The manual was approved by the Council of the Chamber of Accounts in December 2020, after the action plan's implementation period.[69] No progress has been made on the milestones related to selecting CSO representatives for participating in the audit or implementing a pilot audit.
18. Transparency of the financing elections (referendums) and election campaign of candidates,	**Completed** For details regarding the implementation and early results of this commitment, see Section 2.3.

political parties, initiative groups	
19. Systematization and improvement of mechanisms of inclusion of citizens in the discussion of draft laws	**Limited** This commitment is closely linked with Commitment 6 and was added to the action plan in June 2019 under the Open Parliament initiative. The milestone on including procedures for public consultations in the parliament rules of procedure and the law on regulatory acts was not implemented. The portal for public consultation on draft legal acts was established under Commitment 6. However, the drafts presented by the parliament are not published on the portal due no enforcing regulations.
20. Building a dialogue between the Jogorku Kenesh of the Kyrgyz Republic and the civil society	**Limited** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. Under the UNDP-supported Strong and Inclusive Parliamentary Democracy Project,[70] a consultant reviewed the Rules of Procedure of Jogorku Kenesh and developed a recommendation to include a stipulation for annual meetings between parliament and civil society representatives.[71] No further progress has been reported.
21. Introduction of civil society participation practice in the process of Parliamentary monitoring and evaluation of the implementation of laws, programs and activities of state bodies accountable to the Parliament	**Substantial** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. The Decree of Jogorku Kenesh of 20 November 2019 approved guidelines for assessing the implementation of the laws of the Kyrgyz Republic and for assessing the results of state programs.[72] These guidelines mention the involvement of civil society representatives in relevant working groups, though in case of assessing state programs, the engagement of civil society is described as optional. In parallel with the guideline development, joint working groups with representatives of two parliamentary committees and CSOs carried out pilot assessments on the implementation of two laws.[73] A resolution of the Jogorku Kenesh on alternative reports by the civil society and expert organizations has not been adopted yet.
22. Strengthened interaction and dialogue between the Jogorku Kenesh and the local communities	**Substantial** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. In August 2019, the parliament adopted amendments to acts on local self-government (LSG) bodies. These amendments will enforce requirements for lawmakers to consult on LSG-related regulations with the unions and associations of LSG bodies in a manner prescribed by law. In addition, according to the amendments, draft laws directly affecting local communities and local self-government bodies are subject to mandatory approval by associations and unions of LSG bodies before submission to the government.[74] The Union of Local Self Government in partnership with Development Policy Institute proposed regular reporting on the impact of laws on LSGs; this was supported by three parliamentary committees and the vice

	speaker of the parliament. Further, based on this concept note, the abovementioned CSOs produced the first report and presented it to the parliament. However, a decision enforcing the legal requirement for regular reporting has not yet been made.[75]
23. Simplification of procedures of access to the building of the Jogorku Kenesh for citizens and organizing excursions into the parliamentary building	**Limited** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. Under UNDP's Strong and Inclusive Parliamentary Democracy Project,[76] a consultant analyzed the current rules for admitting citizens to the parliament building and organizing tours.[77] According to the parliament Vice Speaker, consultations were held with CSOs regarding timely notification of citizens about upcoming meetings and issuance of passes into the building. The parliament set up a working group to review necessary amendments to the Rules of Procedures of Jogorku Kenesh.[78]
24. Improvement of the accountability of the Parliament to the public and better information on planned activities for the year (by factions and committees)	**Not started** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. According to the draft self-assessment report, there is no evidence of any progress under this commitment.
25. Informing the citizens on the functions and tasks of the Parliament	**Limited** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. The Press Service of the parliament prepares daily updates on the activities of the parliament, including the TV programs "Parliamentarism of Sabaktara," "Parliament,"and "On the Agenda,"[79] and the radio show "Parliament."[80] The parliament broadcasts all open sessions online, including meetings of parliamentary committees and parliament's plenary sessions. However, the planned series of thematic programs on the functions and tasks of the parliament, and the short promotional videos about the Jogorku Kenesh were not completed by the end of the implementation period. According to the Press Service of the parliament, eight videos were filmed about the activities of the parliament in the format of a vlog in sign language for people with hearing disabilities. For people with visual impairments, an audio guide was developed as an online tour of the parliament.[81] However, the IRM researcher could not find these materials online.
26. Monitoring and evaluation of the implementation of the National Action Plan on Open Government by the Government	**Not started** This commitment was added to the action plan in June 2019 under the Open Parliament initiative. According to the government self-assessment report, the parliament reported that the Jogorku Kenesh Rules of Procedures do not allow parliamentary committees to monitor the implementation of decisions

of the Kyrgyz Republic	adopted by a government order.[82] In particular, the self-assessment report refers to point 114-1 of the Rules of Procedures, which states that the committees of the Jogorku Kenesh annually monitor and evaluate the adopted laws and decisions related to their fields, with the aim to monitor the implementation of laws and decisions of the Jogorku Kenesh.[83]

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[1] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021* (2021), (draft provided by the Secretariat of OGP Kyrgyzstan).

[2] The website was not accessible for the IRM researcher while writing the report (July 2021).

[3] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021* (2021), (draft provided by the Secretariat of OGP Kyrgyzstan).

[4] For draft templates for open data on textbooks and methodological materials of state and municipal educational organizations, see, http://ogp.el.kg/sites/default/files/reports/uchebniki.docx.

[5] Min. of Health and Social Development, "НОВОСТИ: Открытые данные в сфере здравоохранения" [News: Open Health Data] (18 Dec. 2019), http://med.kg/ru/novosti/3593-otkrytye-dannye-v-sfere-zdravookhraneniya.html.

[6] OGP Repository, "Показатели системы здравоохранения для публикации на портале Открытых данных Министерства здравоохранения Кыргызской Республики" [Healthcare system indicators for publication on the Open Data portal of the Ministry of Health] (accessed 25 Oct. 2021), http://ogp.el.kg/sites/default/files/reports/ukazanie_i_perechen_otkrytyh_dannyh.pdf.

[7] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[8] The website was not accessible to IRM researcher in the period of writing the report (July 2021).

[9] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[10] Dzhanykulova Bermet, *Альтернативный отчет для оценки Национального Плана действий по построению Открытого Правительства в Кыргызской Республике на 2018-2020 годы, Обязательство: Модернизация государственного реестра судебных актов* [Alternative report to assess the Open Government National Action Plan of the Kyrgyz Republic for 2018-2020, Commitment: Modernization of the state register of judicial acts];(2019), 42, http://ogp.el.kg/sites/default/files/publications/alternative_reports_2019_0.pdf.

[11] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[12] Bermet, [Alternative report to assess the Kyrgyz Republic National Action Plan for Open Government 2018-2020] at 44.

[13] OGP Repository, "Отчет для мероприятия. Приказ № 361 от 31.12.18 г. "О создании межведомственной рабочей группы"" [Report for the Activity. Order No. 361 of the Chairperson of State Registration Service dated 31 December 2018 "On the establishment of an interdepartmental working group"] (22 Oct. 2019), http://ogp.el.kg/node/1118.

[14] State Committee for National Security of Kyrgyz Republic, letter to the Deputy Head of State Registration Service on the work of the multistakeholder working group, 19 Mar. 2019, http://ogp.el.kg/sites/default/files/reports/13-1953_3.pdf.

[15] Government of the Kyrgyz Republic, ЗАКОН КЫРГЫЗСКОЙ РЕСПУБЛИКИ О Национальном архивном фонде Кыргызской Республики [Law of the Kyrgyz Republic "On the National Archival Fund of the Kyrgyz Republic"] no. 125 (22 Nov. 1999), http://cbd.minjust.gov.kg/act/view/ru-ru/288?cl=ru-ru.

[16] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[17] Infocom, "ЭЛЕКТРОННЫЙ АРХИВ ЖЕРТВ РЕПРЕССИЙ 1918-1953" [Electronic Archive of Victims of Repression 1918–1953] https://testrepresion.srs.kg/

[18] Prime Minister, ПРЕМЬЕР-МИНИСТР КЫРГЫЗСКОЙ РЕСПУБЛИКИ РАСПОРЯЖЕНИЕ [Prime Minister of the Kyrgyz Republic, Direction] no. 81(19 Feb. 2019), http://cbd.minjust.gov.kg/act/view/ru-ru/216703.

[19] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[20] Result NGO, РУКОВОДСТВО по альтернативному мониторингу антикоррупционных планов государственных органов [Guidelines for Alternative Monitoring of Government Anticorruption Plans] (Sep. 2019), https://drive.google.com/file/d/1R22tB1s-mAp8P_AX4b8RD2VrGdq2qvar/view.

[21] For more details, see the Facebook page of Result NGO, https://www.facebook.com/OOResult/.

[22] National Open Government Forum, "ПРОТОКОЛ №8 Заседания Национального Форума Открытого Правительства" [Minutes #8, Meetings of the National Forum of the Open Government] (OGP Repository, 27 Feb. 2020), http://ogp.el.kg/ru/protokol-no8-zasedaniya-nacionalnogo-foruma-otkrytogo-pravitelstva.

[23] Civil Society Development Association, "АЛЬТЕРНАТИВНЫЙ МОНИТОРИНГ КАК ВОЗМОЖНОСТЬ ГРАЖДАНСКОГО УЧАСТИЯ В ПРОТИВОДЕЙСТВИИ КОРРУПЦИИ" [Alternative Monitoring as a Possibility of Civil Participation in Anti-Corruption] (18 Dec. 2019), http://cso-central.asia/alternativnyj-monitoring-kak-vozmozhnost-grazhdanskogo-uchastiya-v-protivodejstvii-korrupcii/.

[24] OGP Repository, "Отчет для мероприятия. Общественный доступ к детализированным отчетным данным" [Report for the Activity. Public access to granular reporting data] (17 May 2021), http://ogp.el.kg/node/1410.

²⁵ Min. of Finance, Open Budget: https://budget.okmot.kg/.
²⁶ Min. of Finance, Open Budget Portal: https://oldbudget.okmot.kg/ru/.
²⁷ Min. of Finance, "budget: terms of development of the republican budget for 2021" (18 Mar. 2020), http://kat.minfin.kg/ru.
²⁸ Min. of Finance, "Протокол общественных бюджетных слушаний по проекту республиканского бюджета на 2020 год и прогноза на 2021-2022 годы — Новости ведомства — Министерство финансов Кыргызской Республики" [Minutes of public budget hearings on the draft national budget for 2020 and forecast for 2021-2022] (13 Sep. 2019), http://www.minfin.kg/ru/novosti/proekty-normativnykh-pravovykh-aktov/obratnaya-svyaz-/5639.
²⁹ Min. of Finance, "Проект Закона КР "О республиканском бюджете Кыргызской Республики на 2020 год и прогнозе на 2021-2022 годы" — Новости ведомства — Министерство финансов Кыргызской Республики" [Draft Law of the Kyrgyz Republic "On the republican budget of the Kyrgyz Republic for 2020 and forecast for 2021-2022"] (5 Sep. 2019), http://www.minfin.kg/ru/novosti/proekt-byudzheta807/proekt-zakona-kr-o-respublikanskom-byudzhete-kyrgy5878.
³⁰ Min. of Finance, "Вебинар общественных бюджетных слушаний по проекту республиканского бюджета на 2021 год и прогноза на 2022-2023 годы — Новости ведомства — Министерство финансов Кыргызской Республики" [Webinar of public budget hearings on the draft national budget for 2021 and forecast for 2022-2023] (15 Oct. 2020), http://www.minfin.kg/ru/novosti/novosti/vebinar--obshchestvennykh-byudzhetnykh-slushaniy-po.
³¹ Ministry of Economy, letter to the Ministry of Finance, 27 Sep. 2019, http://ogp.el.kg/sites/default/files/reports/pismo_mekr_amr.pdf.
³² ПРАВИТЕЛЬСТВО КЫРГЫЗСКОЙ РЕСПУБЛИКИ РАСПОРЯЖЕНИЕ [Government of the Kyrgyz Republic Direction] no. 98-r (24 Mar. 2020), http://cbd.minjust.gov.kg/act/view/ru-ru/218026?cl=ru-ru.
³³ *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*
³⁴ OGP Repository, "24.2. Внедрить общественный мониторинг проектов внешней помощи" [24.2. Introduce public monitoring of foreign aid projects] (accessed 25 Oct. 2021), http://ogp.el.kg/sites/default/files/reports/24.2.docx; OGP Kyrgyzstan, "Общественное обсуждение Методички по общественному мониторингу и оценке внешней помощи. Обязательство Минфина по Национальному плану OGP" [Public consultation on Methodology guide for public monitoring of external aid projects] (Facebook, 28 Aug. 2020), https://www.facebook.com/OGPKyrgyzstan/posts/747326415830658.
³⁵ Min. of Finance, Приказ «Об утверждении методического руководства по проведению общественных слушаний по местным бюджетам Кыргызской Республики» [Order "On approving Methodological Guidelines for Conducting Public Hearings on Local Budgets"] (17 Apr. 2018), http://ogp.el.kg/sites/default/files/reports/44-p5191882_44-p_18_04_2018_1.pdf.
³⁶ OGP Repository, "Отчет для мероприятия. Информация об исполнении" [Report for the Activity. Performance information] (accessed 25 Oct. 2021), http://ogp.el.kg/node/1763.
³⁷ Government of the Kyrgyz Republic, ПРАВИТЕЛЬСТВО КЫРГЫЗСКОЙ РЕСПУБЛИКИ ПОСТАНОВЛЕНИЕ Об утверждении Методики оценки муниципального индекса бюджетной прозрачности [Government of the Kyrgyz Republic Decree "On approval of the Methodology for assessing the municipal budget transparency index"] no. 452 (5 Sep. 2019), http://cbd.minjust.gov.kg/act/view/ru-ru/157068.
³⁸ Government of the Kyrgyz Republic, О внесении изменений в постановление Правительства Кыргызской Республики "О формировании гражданского бюджета Кыргызской Республики" от 5 октября 2017 года № 653 [Government of the Kyrgyz Republic Decree "About modification of the order of the Government of the Kyrgyz Republic "On the formation of the civic budget of the Kyrgyz Republic" dated October 5, 2017 No. 653"] no. 54 (18 Feb. 2021), http://cbd.minjust.gov.kg/act/view/ru-ru/158069.
³⁹ Development Policy Institute, *Чем может вдохновить граждан местное самоуправление Кыргызской Республики?* [How can local self-government of the Kyrgyz Republic inspire citizens?] (3 Nov. 2020), http://dpi.kg/ru/library/full/322.html.
⁴⁰ Local community citizen budget: http://gb.minfin.kg/.
⁴¹ *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*
⁴² OGP Repository, "Отчет для мероприятия. Информационная система "Местный бюджет"" [Report for the Activity. Information system "Local budget"] (25 May 2021), http://ogp.el.kg/node/1866.
⁴³ International Business Council, "Новости / Новости законодательства / Правовой обзор за 2-6 августа 2021 года" [News / Legislation News / Legal Review for August 2-6, 2021] (8 Aug. 2021), http://www.ibc.kg/ru/news/legislation/5708_pravovoi_obzor_za_26_avgusta_2021_goda.
⁴⁴ *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*
⁴⁵ Government of the Kyrgyz Republic, ПОСТАНОВЛЕНИЕ ПРАВИТЕЛЬСТВА КЫРГЫЗСКОЙ РЕСПУБЛИКИ О внесении изменений в постановление Правительства Кыргызской Республики "Об оценке деятельности государственных органов исполнительной власти Кыргызской Республики, мэрий городов Бишкек, Ош и их руководителей, полномочных представителей Правительства Кыргызской Республики в областях" от 17 июня 2016 года № 329 [Decision of the Government of the Kyrgyz Republic On amendments to the Resolution of the Government of the Kyrgyz Republic "On the assessment of the activities of state executive bodies of the Kyrgyz Republic, mayoralties of Bishkek and Osh cities and their heads, plenipotentiaries of the Government of the Kyrgyz Republic in the regions" dated June 17, 2016 No. 329] no. 397 (27 Jul 2020), http://ogp.el.kg/sites/default/files/reports/postanovlenie_pravitelstva_kr_ot_27_iyulya_2020_goda_no_397.doc.
⁴⁶ National Statistical Committee of the Kyrgyz Republic, "Индекс доверия населения" [Population Confidence Index] (accessed 25 Oct. 2021), http://www.stat.kg/ru/indeks-doveriya-naseleniya/.
⁴⁷ The website was not accessible during the writing of this report (July 2021).

[48] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[49] This Agency is the successor of the State Agency for Local Self-Government and Interethnic Relations, created by Government Resolution No 38 "On organizational measures in connection with the approval of the new structure of the Government of the Kyrgyz Republic and the reform of the executive authorities of the Kyrgyz Republic" (12 Feb. 2021), http://cbd.minjust.gov.kg/act/view/ru-ru/158019?cl=ru-ru.

[50] State Agency for Regional Development, "Автоматизация и единый реестр муниципального имущества" [Automation and a unified register of municipal property] (accessed 25 Oct. 2021), http://gamsumo.gov.kg/ru/?page_id=2182.

[51] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[52] Nadezhda Dobretsova (Development Policy Institute), interview by IRM researcher, 22 Jul. 2021

[53] State Agency for Regional Development, "Административно- территориальное устройство" [Administrative-territorial structure] (accessed 25 Oct. 2021), http://gamsumo.gov.kg/ru/?page_id=747.

[54] State Property Management Fund, "Фонд по управлению государственным имуществом запускает электронную торговую площадку" [State Property Management Fund launches electronic trading platform] (02 Nov. 2018), https://etp.okmot.kg/fugi/news_info.xhtml;jsessionid=tzXmpgNxrLr2hWiZfrVEslOIjbbFVO4PEqp3yO_L.fgi-app?news=1.

[55] Government of the Kyrgyz Republic, ПОСТАНОВЛЕНИЕ Об утверждении Положения о порядке проведения аукционов на право заключения договора аренды муниципального имущества в электронном формате [Decree On approval of the Regulations on the procedure for holding auctions for the right to conclude a lease agreement for municipal property in electronic format] no. 142 (29 Mar. 2019), http://cbd.minjust.gov.kg/act/view/ru-ru/13451.

[56] OGP Repository, "Отчет для мероприятия. Отчет подпункта 1.1.4 ведомственного плана" [Report for the Activity. Report of subparagraph 1.1.4 of the departmental plan] (2 Sep. 2020), http://ogp.el.kg/node/1047.

[57] In 2021, the Committee was transformed into the Ministry of Energy and Industry based on Government Resolution no. 38 "On organizational measures in connection with the approval of the new structure of the Government of the Kyrgyz Republic and the reform of the executive authorities of the Kyrgyz Republic" dated 12 February 2021 (http://cbd.minjust.gov.kg/act/view/ru-ru/158019?cl=ru-ru).

[58] State Committee of Industry, Energy and Subsoil Use, БУЙРУК ПРИКАЗ 2018-2020-жылдарга Кыргыз Республикасындагы Ачык Өкмөт" демилгесин ишке ашыруу боюнча жумушчу топтун курамын бекитүү жөнүндө [Order N 01-7/116 about approval of the composition of working group on implementation of the Open Government Partnership initiative of the Kyrgyz Republic for 2018-2020] (16 Apr. 2019), http://ogp.el.kg/sites/default/files/reports/prikaz_o_sozdanii_rabochey_gruppy_po_realizacii_nac_plana_po_iniciative_otkrytoe_pravitelstvo.pdf.

[59] OGP Repository, *Сводная таблица информации и данных, необходимых для местных сообществ и сотрудников горнодобывающих компаний из числа местных жителей* [A summary table of information and data needed for local communities and local mining employees] (accessed 25 Oct. 2021), http://ogp.el.kg/sites/default/files/reports/spisok_informacii_i_dannyh_dlya_mestnyh_1.docx.

[60] OGP Repository, "Отчет для мероприятия. Протокол 4-го заседания РГ" [Report for the Activity. Minutes of the 4th meeting of the WG] (23 Oct. 2020), http://ogp.el.kg/node/1194.

[61] Min. of Energy and Industry, "Местному сообществу необходимы достоверные, открытые данные по каждому горнодобывающему проекту" [The local community needs reliable, open data on every mining project] (Min. of Energy and Industry, 6 Nov. 2019), http://www.gkpen.kg/index.php/press/news/730-2019-11-06-12-00-43.

[62] State Committee for Industry, Energy, Subsoil Use, ПРИКАЗ ГОСУДАРСТВЕННЫЙ КОМИТЕТ ПРОМЫШЛЕННОСТИ, ЭНЕРГЕТИКИ И НЕДРОПОЛЬЗОВАНИЯ КЫРГЫЗСКОЙ РЕСПУБЛИКИ [Draft amendments to the Order of the State Committee for Industry, Energy, Subsoil Use of the Kyrgyz Republic "On Improving the Reporting Processes of Subsoil Users"] (4 Mar. 2020), http://www.ogp.el.kg/sites/default/files/reports/proekt_prikaza_gkpen_-_18.12.2019_2.docx.

[63] State Committee for Industry, Energy, and Subsoil Use, letter to the government of Kyrgyz Republic and state agencies, (OGP Repository, 12 Aug. 2020), http://www.ogp.el.kg/sites/default/files/reports/pismo_v_apkr_i_gosorgany_2.pdf.

[64] Min. of Energy and Industry, "Список действующих лицензий (2625 ед.)" [List of valid licenses (2625 units)] (accessed 25 Oct. 2021), http://www.gkpen.kg/index.php/2017-12-22-09-23-23.

[65] Working Group on Increasing Transparency in the Mining Industry, "ПРОТОКОЛ 5-го заседания рабочей группы по обеспечению прозрачности в горнодобывающей отрасли по обязательству: «Раскрытие взаимосвязанных данных в горнодобывающей отрасли на уровне лицензии» Национального Плана Действий по построению Открытого Правительства" [Minutes of the fifth meeting of the Working Group on Increasing Transparency in the Mining Industry] (17 Dec. 2020), http://ogp.el.kg/sites/default/files/reports/protokol_5_zasedaniya_3.pdf.

[66] OGP Repository, "Отчет для мероприятия: Разработка и принятие Положения об аудите с участием общественности." [Report for the Activity. Development of the draft Regulation on the audit with the participation of the public] (10 Mar. 2020), http://ogp.el.kg/node/676.

[67] Chamber of Accounts, "В Счетной палате КР проводится обучение по повышению квалификации сотрудников" [The Accounts Chamber of the Kyrgyz Republic conducts training to improve the qualifications of employees] (accessed 25 Oct. 2021), https://www.esep.kg/index.php?option=com_newscatalog&view=article&id=1079&Itemid=170&lang=ru.

[68] OGP Repository, "Отчет для мероприятия. отчет по разработке проекта Методического пособия по аудиту с участием общественности" [Report for the Activity. report on the development of the draft Public Audit Manual] (10 Mar. 2020), http://ogp.el.kg/node/1402; *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*

[69] Chamber of Accounts, "18-декабря 2020-года состоялось очередное заседание Совета Счетной палаты Кыргызской Республики" [On December 18, 2020, a regular meeting of the Council of the Chamber of Accounts of the Kyrgyz Republic was held] (accessed 25 Oct. 2021), https://www.esep.kg/index.php?option=com_newscatalog&view=article&id=1288:18-dekabrya-2020-goda-sostoyalos-ocherednoe-zasedanie-soveta-schetnoj-palaty-kyrgyzskoj-respubliki&Itemid=170&lang=ru.
[70] UNDP Kyrgyz Republic, "Strong and Inclusive Parliamentary Democracy" (accessed 25 Oct. 2021), https://www.kg.undp.org/content/kyrgyzstan/en/home/projects/strong-and-inclusive-parliamentary-democracy.html.
[71] Aijan Musaeva (UNDP expert), interview by IRM researcher, 5 Aug. 2021.
[72] Jogorku Kenesh, "от 20 ноября 2019 года № 3362-VI Об утверждении Концепции применения инструментов оценки в рамках реализации функций парламентского контроля Жогорку Кенеша Кыргызской Республики" [dated November 20, 2019 No. 3362-VI On approval of the Concept of application of assessment tools in the framework of the implementation of the functions of parliamentary control of the Jogorku Kenesh of the Kyrgyz Republic] (20 Nov. 2019), http://www.kenesh.kg/ru/article/show/6071/ot-20-noyabrya-2019-goda-3362-vi-ob-utverzhdenii-kontseptsii-primeneniya-instrumentov-otsenki-v-ramkah-realizatsii-funktsiy-parlamentskogo-kontrolya-zhogorku-kenesha-kirgizskoy-respubliki.
[73] Musaeva, interview; Working Group of the Committee on the Rule of Law, Fighting Crime and Anti-Corruption of Jogorku Kenesh of the Kyrgyz Republic, *СПРАВКА О РЕЗУЛЬТАТАХ ОЦЕНКИ ИСПОЛНЕНИЯ ОТДЕЛЬНЫХ НОРМ ЗАКОНА КР «О ПРОФИЛАКТИКЕ ПРАВОНАРУШЕНИЙ В КЫРГЫЗСКОЙ РЕСПУБЛИКЕ» И ЗАКОНА КР «ОБ ОХРАНЕ И ЗАЩИТЕ ОТ СЕМЕЙНОГО НАСИЛИЯ»* [Information on the results of the assessment of the implementation of some provisions of the laws of the KR "On Prevention of Offenses in the Kyrgyz Republic" and "On Protection from Domestic Violence"] (31 May 2019), https://reforma.kg/media/post/postpdf/2019-09-16-1419247028.pdf.
[74] Government of Kyrgyz Republic, ЗАКОН КЫРГЫЗСКОЙ РЕСПУБЛИКИ О внесении изменений в некоторые законодательные акты по вопросам деятельности органов местного самоуправления [Law of the Kyrgyz Republic "On amendments to some legislative acts on the activities of local self-government bodies"] (8 Aug. 2019), http://cbd.minjust.gov.kg/act/view/ru-ru/111962?cl=ru-ru.
[75] Nadezhda Dobretsova (Development Policy Institute), interview by IRM researcher, 22 Jul. 2021.
[76] UNDP Kyrgyz Republic, "Strong and Inclusive Parliamentary Democracy."
[77] Musaeva, interview.
[78] Jogorku Kenesh, "Аида Касымалиева рассказала об исполнении Плана действий по построению Открытого Парламента" [Aida Kasymalieva spoke about the implementation of the Action Plan on Open Parliament] (20 Dec. 2019), http://www.kenesh.kg/ru/news/show/9299/aida-kasimalieva-rasskazala-ob-ispolnenii-plana-deystviy-po-postroeniyu-otkritogo-parlamenta.
[79] See the video gallery of Jogorku Kenesh of the Kyrgyz Republic: http://www.kenesh.kg/ru/video-gallery/48/list.
[80] See the radio archive of Jogorku Kenesh of the Kyrgyz Republic: http://www.kenesh.kg/ru/radio/list/86.
[81] Jogorku Kenesh, "Пресс-служба Жогорку Кенеша и ОФ «Плюс» презентовали результаты проекта по обеспечению доступа лиц с инвалидностью к информации о деятельности парламента" [The press service of the Jogorku Kenesh and public fund "Plus" presented the results of the project to ensure access of persons with disabilities to information on the activities of the parliament] (16 Dec. 2019), http://www.kenesh.kg/ru/news/show/9229/press-sluzhba-zhogorku-kenesha-i-of-plyus-prezentovali-rezulytati-proekta-po-obespecheniyu-dostupa-lits-s-invalidnostyyu-k-informatsii-o-deyatelynosti-parlamenta.
[82] *Report on the implementation of the National Action Plan of the Open Government Partnership for the period from October 16, 2018 to April 16, 2021.*
[83] Government of the Kyrgyz Republic, ЗАКОН КЫРГЫЗСКОЙ РЕСПУБЛИКИ О Регламенте Жогорку Кенеша Кыргызской Республики [Law of the Kyrgyz Republic On the Regulations of the Jogorku Kenesh of the Kyrgyz Republic] (25 Nov. 2011), http://cbd.minjust.gov.kg/act/view/ru-ru/203166?cl=ru-ru.

III. Multistakeholder Process

3.1 Multistakeholder process throughout action plan implementation

In 2017, OGP adopted the *OGP Participation and Co-Creation Standards* 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 the 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 their action plan development and implementation to act according to the OGP process. Kyrgyzstan **did not act** contrary to OGP process.[1]

Please see Section 3.2 for an overview of Kyrgyzstan's performance implementing the Co-Creation and Participation Standards throughout the action plan implementation.

Table 3.1: Level of Public Influence

The IRM adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply it to OGP.[2] In the spirit of OGP, most countries should aspire to "collaborate."

Level of public influence		During development of action plan	During implementation 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		

The level of civil society engagement was relatively high during the implementation period, in contrast to the weak ownership by government bodies responsible for commitments. Most of the CSO-suggested milestones were implemented by those organizations under donor-funded projects and had varying levels of government engagement. Several joint working groups were formed for implementing specific commitments, and awareness-raising activities helped inform and engage the public. Several commitments saw public discussions, presentations, workshops, and conferences, both in person and online, which was most often used after March 2020 due to the pandemic.[3]

Regarding raising awareness of OGP processes, a number of conferences, meetings, and trainings were organized by the Secretariat of OGP National Forum to present OGP concepts and the action plan implementation process to a large group of stakeholders both during and after the action plan implementation period. The OSCE office in Bishkek provided much support for the Secretariat of the OGP National Forum, the monitoring and public outreach activities, and the maintenance and administration of the country's OGP website.

Two annual conferences were organized with the support of the OSCE office in Bishkek in October 2018 and December 2019, aimed at presenting the OGP action plan and the results of its implementation.[4] A number of meetings were organized by the Secretariat and other stakeholders in 2019 for civil society representatives to discuss possible ways of civil society engagement and

monitoring.[5] As a result, CSOs published reports covering implementation of seven commitments.[6] In October 2019, the OGP Secretariat organized a series of lectures on OGP for the students of 16 universities,[7] and an essay competition was announced to engage students on the issues of open governance.[8] In November 2019, a seminar was held with the media and press services of government bodies.[9] In 2020, webinars were organized for National Forum members and youth organizations to discuss the government actions during the pandemic and engage the youth in forming the new action plan.[10]

The Open Government National Forum held four meetings in the implementation period.[11] During these meetings, implementation progress and problems were discussed. In addition, the National Forum reviewed documents produced under the commitments, such as workplans, guidelines, and draft policies. During the December 2019 meeting, the OGP Secretariat presented its annual report on the implementation of commitments.[12] At the meeting in February 2020, it was decided to start collecting commitment proposals for the next action plan.[13] However, there were no further meetings in 2020 due to both the COVID-19 pandemic and changes in the government cabinet, which caused the resignation of several forum members. At the time of this report, the forum included only four government representatives and two members of parliament[14] instead of the 19 state representatives initially assigned by the government decision.

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

[2] IAP2, "IAP2 Spectrum of Public Participation" (2018), https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf.

[3] For more information on the awareness raising and engagement activities in the framework of commitments' implementation, *see* §§2.3 and 2.4, as well as the national OGP website (http://ogp.el.kg/ru/news), and the Facebook page of OGP Kyrgyzstan (https://www.facebook.com/OGPKyrgyzstan/).

[4] OSCE, "Kyrgyzstan presents National Action Plan on increasing government's accountability, developed with OSCE support" (24 Oct. 2018), https://www.osce.org/programme-office-in-bishkek/400868; Cabinet of Ministers, "Вице-премьер-министр Алтынai Омурбекова: Реализация «Открытого Правительства» улучшит качество принимаемых решений" [Vice Prime Minister Altynai Omurbekova, "Implementation of the "Open Government" will improve the quality of decisions] (20 Dec. 2019), https://www.gov.kg/ru/post/s/vitse-premer-ministr-altynay-omurbekova-realizatsiya-otkrytogo-pravitelstva-uluchshit-kachestvo-prinimaemykh-resheniy; OGP Kyrgyzstan, "В Бишкеке прошла конференция «Промежуточные итоги реализации Национального плана действий по построению Открытого Правительства на 2018-2020 годы»" [A conference "Interim results of the implementation of the OGP National Action Plan for 2018-2020" was held in Bishkek] (1 Feb. 2020), http://ogp.el.kg/ru/news/v-bishkeke-proshla-konferenciya-promezhutochnye-itogi-realizacii-nacionalnogo-plana-deystviy-po.

[5] OGP Kyrgyzstan, "Состоялся Круглый стол по обсуждению роли гражданского общества в процессе построения Открытого Правительства/Открытого Парламента" [A round table was held to discuss the role of civil society in the process of building an Open Government / Open Parliament, OGP Kyrgyzstan] (14 Mar. 2019), http://ogp.el.kg/ru/news/sostoyalsya-kruglyy-stol-po-obsuzhdeniyu-roli-grazhdanskogo-obshchestva-v-processe-postroeniya; OGP Kyrgyzstan, "Открытое правительство: гражданское общество изучает эффективные методы общественного мониторинга" [Open government: Civil society is exploring effective methods of public monitoring] (1 Apr. 2019), http://ogp.el.kg/ru/news/otkrytoe-pravitelstvo-grazhdanskoe-obshchestvo-izuchaet-effektivnye-metody-obshchestvennogo; OGP Kyrgyzstan, "В Бишкеке прошел семинар «Общественный мониторинг исполнения Национального плана действий по построению Открытого Правительства»" [A seminar "Public monitoring of the implementation of the OGP National Action Plan" was held in Bishkek] (5 Jul. 2019), http://ogp.el.kg/ru/news/v-bishkeke-proshel-seminar-obshchestvennyy-monitoring-ispolneniya-nacionalnogo-plana-deystviy; OGP Kyrgyzstan, "В Оше прошел семинар «Общественный мониторинг исполнения Национального плана действий по построению Открытого Правительства»" [A seminar "Public monitoring of the implementation of the OGP National Action Plan " was held in Osh, OGP Kyrgyzstan] (5 Jul. 2019), http://ogp.el.kg/ru/news/v-oshe-proshel-seminar-obshchestvennyy-monitoring-ispolneniya-nacionalnogo-plana-deystviy-po; Univ. of Central Asia, "Enhancing Citizen Engagement with Open Government Data" (1 Apr. 2019), https://ucentralasia.org/schools/graduate-school-of-development/civil-society-initiative/enhancing-citizen-engagement-with-open-data.

[6] E. Sakkaraeva, *АЛЬТЕРНАТИВНЫЙ ОТЧЕТ о ходе реализации Инициативы №11 НПД на 2018-2020 гг. «Реализация и продвижение политики открытых данных в Кыргызской Республике»* [ALTERNATIVE REPORT on the implementation of the NAP Initiative No. 11 for 2018-2020. "Implementation and promotion of open data policy in the Kyrgyz Republic"] (2019); Akbar Amanov, *Альтернативный отчет для оценки Национального плана действий по построению Открытого Правительства в Кыргызской Республике на 2018-2020е годы, Обязательство: Обеспечение доступа граждан к архивным документам 1918-1953 годов* [Alternative assessment report for Open Government National Action Plan of the Kyrgyz Republic for 2018-2020, Commitment: Ensuring citizens' access to archival documents from 1918-1953]; Avazkan Ormonova, *Альтернативный отчет по инициативе "Расчет уровня доверия к органам местного*

самоуправления" [Alternative report on the initiative "Calculation of the level of trust in local government bodies"] (Dec. 2019); Bermet Dzhanykulova, *Альтернативный отчет для оценки Национального Плана действий по построению Открытого Правительства в Кыргызской Республике на 2018-2020 годы, Обязательство: Модернизация государственного реестра судебных актов* [Alternative report to assess the Open Government National Action Plan of the Kyrgyz Republic for 2018-2020, Commitment: Modernization of the state register of judicial acts]; Saikal Malik kyzy, Ainura Chekirova, *Альтернативный отчет по инициативе "Улучшение доступа к информации государственных и муниципальных органов"* [Alternative report on the initiative "Improving access to information of state and municipal authorities"] (Dec. 2019); Проект «Методология подготовки альтернативных отчетов для оценки Национального Плана Действий по построению Открытого Правительства в Кыргызской Республике на 2018 – 2020 годы», Обязательство «Обеспечение бюджетной прозрачности местных бюджетов и учет интересов местных сообществ в бюджетном процессе» [Draft Methodology for preparing alternative reports for assessing the Open Government National Action Plan of the Kyrgyz Republic for 2018-2020, Commitment "Ensuring transparency of local budgets and taking into account the interests of local communities in the budgeting process"]; "Ergeshbaeva & Partners" Business Law Firm, *Альтернативный отчет по обязательству ГКПЭН «Раскрытие взаимосвязанных данных в горнодобывающей отрасли на уровне лицензии» (обязательство НПД 18)* [Alternative report on the SCIESU Commitment "Disclosure of related data in the mining industry at the license level" (NAP commitment 18)]. http://ogp.el.kg/sites/default/files/publications/alternative_reports_2019_0.pdf.

[7] OGP Kyrgyzstan, "В Бишкеке стартовала серия гостевых лекций для ВУЗов по вопросам Открытого Правительства" [A series of guest lectures for universities on the issues of the Open Government have launched in Bishkek] (9 Oct. 2019), http://ogp.el.kg/ru/news/v-bishkeke-startovala-seriya-gostevyh-lekciy-dlya-vuzov-po-voprosam-otkrytogo-pravitelstva.

[8] OGP Kyrgyzstan, "Объявляется конкурс среди студентов на написание эссе на тему «Открытое Правительство моими глазами»" [A competition is announced for students to write an essay on the topic "Open Government through my eyes"] (14 Oct. 2019), http://ogp.el.kg/ru/news/obyavlyaetsya-konkurs-sredi-studentov-na-napisanie-esse-na-temu-otkrytoe-pravitelstvo-moimi.

[9] OGP Kyrgyzstan, "В Бишкеке прошел семинар для представителей средств массовой информации и пресс-служб государственных органов по вопросам Открытого Правительства" [A seminar was held in Bishkek for representatives of the media and press services of state bodies on the issues of the Open Government] (13 Nov. 2019), http://ogp.el.kg/ru/news/v-bishkeke-proshel-seminar-dlya-predstaviteley-sredstv-massovoy-informacii-i-press-sluzhb.

[10] OGP Kyrgyzstan, "Члены Национального Форума Открытого Правительства и представители молодежных организаций обсудили действия Правительства Кыргызской Республики во время пандемии COVID-19" [Members of the National Open Government Forum and representatives of youth organizations discussed the actions of the Government of the Kyrgyz Republic during the COVID-19 pandemic] (8 Apr. 2020), http://ogp.el.kg/ru/news/chleny-nacionalnogo-foruma-otkrytogo-pravitelstva-i-predstaviteli-molodezhnyh-organizaciy; OGP Kyrgyzstan, "Прошел вебинар по вовлечению молодежи в процесс формирования нового НПД" [A webinar on youth involvement in the process of forming a new NAP was held] (23 Jul. 2020), http://ogp.el.kg/ru/news/proshel-vebinar-po-vovlecheniyu-molodezhi-v-process-formirovaniya-novogo-npd.

[11] OGP Kyrgyzstan, "Решения Форума" [Forum Decisions] (27 Feb. 2020), http://ogp.el.kg/ru/forum/protocols.

[12] OGP Kyrgyzstan, "ПРОТОКОЛ №7 Заседания Национального Форума Открытого Правительства" [Minutes No. 7, Meetings of the National Forum of the Open Government] (17 Dec. 2019), http://ogp.el.kg/ru/protokol-no7-zasedaniya-nacionalnogo-foruma-otkrytogo-pravitelstva.

[13] OGP Kyrgyzstan, "ПРОТОКОЛ №8 Заседания Национального Форума Открытого Правительства" [Minutes No. 8, Meetings of the National Forum of the Open Government] (27 Feb. 2020) http://ogp.el.kg/ru/protokol-no8-zasedaniya-nacionalnogo-foruma-otkrytogo-pravitelstva.

[14] OGP Kyrgyzstan, "База данных членов Форума" [Forum members' database] (as of 28 Jul. 2021), http://ogp.el.kg/ru/forum/members.

3.2 Overview of Kyrgyzstan's Performance Throughout Action Plan Implementation

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

Multistakeholder Forum	During Development	During Implementation
1a. Forum established: The Open Government National Forum was established through Government Decree No. 226-r on 27 June 2018.[1]	Green	Green
1b. Regularity: According to regulations approved by the OGP Forum, meetings should be held at least once a month. There were four meetings held in the implementation period up to February 2020.[2] No further meetings were organized by the time of writing this report, due to the pandemic and political changes that impacted government representation in the forum.[3]	Green	Yellow
1d. Mandate public: The information on the forum's regulations and membership is available on the country's OGP website.[4]	Green	Green
2a. Multistakeholder: The forum includes both governmental and nongovernmental representatives.	Green	Green
2b. Parity: Initially, the forum included an even balance of 19 governmental and 19 nongovernmental representatives; however, after political changes, the number of state representatives decreased to six.[5]	Green	Yellow
2c. Transparent selection: Nongovernmental forum members were selected by the Open Government Coalition; the selection criteria and process is described in the selection meeting minutes.[6]	Green	Green
2d. High-level government representation: The forum includes ministers, committee chairs, and parliament members. However, many of the government members have resigned and the position of Forum Co-Chair from the government is vacant (previously the Vice Prime Minister chaired the forum).	Green	Yellow
3d. Openness: The forum accepts input on the action plan's implementation from any civil society member or other stakeholder outside the forum.	Green	Green
3e. Remote participation: Opportunities for remote participation were not provided during the meetings of the National Forum but were available for events organized under specific commitments.	Red	Yellow
3f. Minutes: The National Forum publishes its meeting minutes on the country's OGP website.[7]	Yellow	Green

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

Action Plan Implementation	
4a. Process transparency: There is a national OGP website (http://www.ogp.el.kg/) with regular updates on commitment and milestone progress, including reasons for delays.[8]	Green
4b. Communication channels: The website allows for public comments on implementation reports for specific commitments.	Green
4c. Engagement with civil society: A number of meetings and conferences were held to present the OGP process and action plan implementation. In addition, the state and nongovernmental organizations involved in the action plan implementation had meetings with civil society and other interested stakeholders on specific commitments and their implementation.	Green
4d. Cooperation with the IRM: The OGP Kyrgyzstan website allocates a special section to IRM[9] and a space for IRM reports in the reports section.[10] However, the IRM Design Report which was published on the OGP website prior to the publication of this report, has not been posted on the OGP Kyrgyzstan website.	Yellow
4e. MSF engagement: The multistakeholder forum monitors and discusses the implementation of the NAP; however, no meetings were held after February 2020.	Yellow
4f. MSF engagement with self-assessment report: The Secretariat presented the semi-annual and annual self-assessment reports to the National Forum for approval. The end-of-term self-assessment report was submitted to the co-chair of the National Forum but not to other members, pending the decision on the new composition of the forum.[11]	Green
4g. Repository: The Repository is available online via the domestic OGP website, without barriers to access.[12] It provides at least one supporting document for most commitments, updated regularly in line with IRM guidance. However, not all of the action plan commitments are included (15 out of 26 commitments posted information).	Yellow

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[1] See http://cbd.minjust.gov.kg/act/view/ru-ru/216401?cl=ru-ru.

[2] OGP Kyrgyzstan, "Решения Форума" [Forum Decisions] (accessed 25 Oct. 2021), http://ogp.el.kg/ru/forum/protocols.

[3] Bakytbek Satybekov (Alliance on Civic Initiatives Promotion, National Forum Co-Chair), interview by IRM researcher, 13 Jul. 2021; Ulukbek Visid uulu (OGP Secretariat), interview by IRM researcher, 20 Jul. 2021.

[4] OGP Kyrgyzstan, "Положение о Национальном Форуме Открытого Правительства" [Regulations on the National Open Government Forum] (30 Jun. 2018), http://ogp.el.kg/ru/normativnye-akty.

[5] OGP Kyrgyzstan, "База данных членов Форума" [Forum members' database] (as of 28 Jul. 2021), http://ogp.el.kg/ru/forum/members.

[6] OGP Kyrgyzstan, "ПРОТОКОЛ Выборов представителей Коалиции Открытое Правительство в Форум Открытого Правительства" [PROTOCOL Election of Coalition Representatives Open Government to the Open Government Forum]

(accessed 25 Oct. 2021),
http://ogp.el.kg/sites/default/files/documents/protokol_vyborov_kandidatov_grazhdanskogo_obshchestva_v_forum_ogp.pdf.
[7] OGP Kyrgyzstan, "Решения Форума" [Forum Decisions].
[8] OGP Kyrgyzstan, "Все отчеты Отчеты Национального Форума Открытого Правительства" [All Reports: Reports of OGP National Forum] (accessed 25 Oct. 2021), http://ogp.el.kg/ru/vse-otchety; OGP Kyrgyzstan, "Список обязательств" [List of obligations] (accessed 25 Oct. 2021), http://ogp.el.kg/ru/commitments.
[9] OGP Kyrgyzstan, "IRM и отслеживание прогресса OGP" [IRM and OGP Progress Tracking] (accessed 25 Oct. 2021), http://ogp.el.kg/ru/irm-i-otslezhivanie-progressa-ogp.
[10] OGP Kyrgyzstan, "Все отчеты…." [All Reports: Reports of OGP National Forum].
[11] Ulukbek Visid uulu (OGP Secretariat), email to IRM researcher, 4 Aug. 2021.
[12] OGP Kyrgyzstan, "Список обязательств" [List of obligations].

IV. Methodology and Sources

Research for the IRM reports is carried out by national researchers. All IRM reports undergo a process of quality control led by IRM staff to ensure that the highest standards of research and due diligence have been applied.

The International Experts Panel (IEP) of the IRM oversees the quality control of each report. The IEP is composed of experts in transparency, participation, accountability, and social science research methods.

Current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual[1] and in Kyrgyzstan's 2018–2020 Design Report .[2]

About the IRM

The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

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Open Government Partnership

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[1] IRM, *IRM Procedures Manual* (16 Sep. 2017), https://www.opengovpartnership.org/documents/irm-procedures-manual.
[2] Kemel Toktomushev, *Independent Reporting Mechanism (IRM): Kyrgyz Republic Design Report 2018–2020* (OGP, 1 Jun. 2021), https://www.opengovpartnership.org/documents/kyrgyz-republic-design-report-2018-2020-for-public-comment/.

Annex I. IRM Indicators

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.[1] 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?
- **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. It 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.

Results-oriented commitments?

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment design is one that clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., 'Misallocation of welfare funds' is more helpful than 'lacking a website.').
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., "26% of judicial corruption complaints are not processed currently")?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment's implementation (e.g., "doubling response rates to information requests" is a stronger goal than "publishing a protocol for response.")?

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. To receive a star, a commitment must meet several criteria:

- The commitment's design should be **Verifiable**, **Relevant** to OGP values, and have **Transformative** potential impact as assessed in the Design Report.
- The commitment's implementation must be assessed by IRM Implementation Report as **Substantial** or **Complete.**

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

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[1] IRM, *IRM Procedures Manual* (16 Sep. 2017), https://www.opengovpartnership.org/documents/irm-procedures-manual.