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Independent Reporting Mechanism (IRM): Bosnia and Herzegovina Transitional Results Report 2019–2021

This report was prepared in collaboration with Elma Demir, 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 Elma Demir 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 Bosnia and Herzegovina's first action plan for 2019–2021. In 2021, the IRM will implement 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: 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

Bosnia and Herzegovina (BiH) state-level institutions used this first action plan to focus on government priorities in open government and good governance. By the end of the implementation period, Commitments 1 (open data on public procurement in BiH), 2 (developing a web platform for online drafting of integrity plans), and 5 (involving civil society organizations in policy-making processes) had limited completion. Commitments 3 (developing online training modules on integrity plans for civil servants) and 4 (increasing availability, openness, and use of official statistical data) had substantial completion, and Commitments 6 (improving transparency in BiH institutions) and 7 (drafting a Budget for Citizens) were fully completed.

Before the start of the action plan implementation, institutions had already begun implementing Commitments 3, 4, and 6. These commitments already had funding and were less impacted by COVID-19 delays. Commitment 3 also demonstrated close collaboration between civil society and public institutions to develop the content of training materials on integrity plans.

Civil society noted that a lack of external funding (e.g., international foundations) led to limited completion of Commitment 2, and that funding will likely be an important factor in implementing future action plan commitments.[1] The IRM suggests stakeholders consider whether commitments have adequate funding to be implemented for future action plans.

The IRM design report identified Commitments 1, 5, and 7 as noteworthy commitments. Restrictions on freedom of assembly due to COVID-19 delayed activities for Commitment 5 to the extent that it had only limited completion by the end of the implementation period. Limited implementation of Commitment 1 was due to legislative amendments not passing in parliament, which would have otherwise opened the door to full implementation. The responsible institution for implementing Commitment 1 aims to continue work on opening public procurement in future action plans.[2] Commitment 7 on the other hand, completed the activities for developing the Budget for Citizens. While it did gain limited media attention, more could have been done to actively disseminate the information to the public beyond publishing it on the website. Only Commitment 7 is examined in further detail in Section 2.3.

2.2. COVID-19 pandemic impact on implementation

The COVID-19 pandemic significantly impacted commitment implementation as well as the operations of the Advisory Council. From March through to the summer of 2020, all institutions, including those on the state level, were focused on mitigating the crisis. This meant facing new modes of operations and adjusting procedures to online and remote work. Since public institutions did not have such practices in place prior to the pandemic, it took significant time to adjust to these changes.

Furthermore, the pandemic affected institutional capacity—from illness as well as increased workloads. For example, the Agency for Public Procurement of BiH conducted additional monitoring and evaluations of public procurement related to the COVID-19 pandemic, which created new workloads for its employees.[3] Accusations of corruption in public procurement became an issue during 2020 as instances surfaced of profiteering and inflated prices in the purchase of ventilators and other pandemic-related items.[4]

The pandemic also significantly delayed workshops and trainings as part of commitments under the Ministry of Justice, Public Administration Reform Coordinator's Office of BiH (PARCO), and the Agency for Statistics of BiH, some of which were later held online.[5] Despite these challenges, the Advisory Council managed to meet at least four times during the year, initially online and then later with in-person meetings.

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[1] Leila Bičakčić (Center for Investigative Journalism (CIN)), interview by IRM researcher, 6 Dec. 2021; Danira Karović and Darko Brkan (Association "Why not?"), interview by IRM researcher, 8 Dec. 2021.

[2] Agency for Public Procurement, "Draft Work Program of the Agency for Public Procurement of BiH for 2022", 21 Jul 2021, https://ekonsultacije.gov.ba/legislativeactivities/details/113066

[3] Belma Sečibović and Dario Kihli (Agency for Public Procurement of BiH), interview by IRM researcher, 7 Dec. 2021.

[4] Aida Djugum, Edib Bajrovic, and Andy Heil, "How Did A Bosnian Raspberry Farm Get A State Contract To Acquire 100 Ventilators?" (Radio Free Europe –Radio Liberty, 5 May 2020), https://www.rferl.org/a/bosnia-ventilators-scandal-covid-19-raspberry-farm-multimillion-deal-procurement/30594315.html.

[5] Vildan Hadžihasanović (Min. of Justice of BiH), interview by IRM researcher, 6 Dec. 2021; Vedrana Faladzic and Mubera Begic (PARCO), interview by IRM researcher, 6 Dec. 2021; Alen Mrgud (Agency for Statistics of BiH), interview by IRM researcher, 7 Dec. 2021.

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, new IRM results report will not continue using DIOG as an indicator.

Section 2.3 focuses on outcomes from implementing 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 been termed "noteworthy commitments," as assessed by the IRM in its design report for Bosnia and Herzegovina 2019–2021.[2] While this section analyzes the IRM's findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of the level of completion for all the commitments in the action plan.

Commitment 7. Drafting of the Budget for Citizens	
Aim of the commitment	The Ministry of Finance and Treasury of BiH aimed to introduce the practice of preparing and publishing a Budget for Citizens to improve financial transparency of the state-level government. Although the Ministry regularly published the annual budget for the state-level government, this commitment would publish budget information in a user-friendly format for the general public.
Did it open government? **Marginal**	The Ministry of Finance and Treasury of BiH completed all activities planned as part of this commitment. The ministry, supported by Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), organized several workshops and focus groups to collect comments on the proposed methodology for preparing and publishing the Budget for Citizens of state-level institutions. These gatherings included 21 representatives from public institutions and 8 civil society representatives. These stakeholders wanted more information on the state of public debt, what is financed from reserve funds, data on salaries of civil servants and appointed persons, connections with strategic budget documents, and public procurement. After these consultations and changes to the methodology (by adding data on public debt, reserve funding, and salaries), the ministry prepared and published the Budget for Citizens,[3] which the Council of Ministers of BiH also published.[4] The Budget for Citizens provides useful and user-friendly information on budget users, allocations of the budget by institutions and programs, and includes various visual data (infographics, statistics, etc.). Civil society representatives said it provides a good overview of how the state government is financed and how funding is distributed.[5] After its publication, the Budget for Citizens received some media attention,[6] however it was not subject to widespread public dissemination

	activities and remains unknown to many citizens and CSOs. The IRM researcher found it was not easy to browse and access the Budget for Citizens through basic internet and website searches. This may be because it is currently located in an old news section of the ministry's website which is being revised at the end of 2021.[7] Implementing this commitment advances open government, in particular civic participation, as demonstrated through the positive collaboration between government institutions and civil society to develop the Budget for Citizens. However, despite the development and publishing of a detailed Budget for Citizens for the first time in BiH, its wider use for financial transparency remains limited. Civil society suggested creating an application that would provide diverse data in graphics to improve access.[8] The ministry could also disseminate the budget using a broad range of communication channels, including through radio and social media, and even provide physical copies of the Budget for Citizens in local libraries and other community locations.[9] The next action plan will contain a commitment on improving budget transparency, which will introduce the Budget for Citizens with disaggregated institution-by-institution budget and spending information.[10] It is important that this information will be published in open formats, and consistently across relevant institutions.

[1] IRM design reports identified strong commitments as "noteworthy commitments" if they were assessed as verifiable, relevant, and had transformative potential impact. If no commitments met the potential impact threshold, the IRM selected noteworthy commitments from the commitments with "moderate" potential impact. For the list of Bosnia and Herzegovina's noteworthy commitments, see the Executive Summary of the 2019–2021 IRM design report: https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-design-report-2019-2021/

[2] The following commitments, assessed as noteworthy in BiH's design report, are not included in this section because their limited implementation means there is not enough progress to assess results:
Commitment 1: Open Data on Public Procurement in BiH; and
Commitment 5: Involvement of civil society organizations in policy-making processes.

[3] Min. of Finance and Treasury of Bosnia and Herzegovina, *Budžet za građane institucija BiH i međunarodnih obaveza BiH* [Budget for Citizens of the institutions of BiH and international obligations BiH] (25 Apr. 2021), https://www.mft.gov.ba/Publication/Read/budzet-za-gradjane-institucija-bih-i-meunarodnih-obaveza-bih?pageId=97.

[4] Min. of Finance and Treasury of Bosnia and Herzegovina, *Budžet za građane* [Budget for citizens] (25 Apr. 2021), https://vijeceministara.gov.ba/home_right_docs/default.aspx?id=34547&langTag=bs-BA.

[5] Danira Karović and Darko Brkan (Association "Why not?"), interview by IRM researcher, 8 Dec. 2021.

[6] Klix, "Ovo trebate znati o budžetu Bosne i Hercegovine: Koje institucije najviše troše?" [You need to know this about Bosnia and Herzegovina's budget: Which institutions spend the most?] (12 Jan. 2021), https://www.klix.ba/biznis/finansije/ovo-trebate-znati-o-budzetu-bosne-i-hercegovine-koje-institucije-najvise-trose/210111139.

[7] Halida Pasic (Min. of Finance and Treasury of BiH), interview by IRM researcher, 6 Dec. 2021.

[8] Danira Karović and Darko Brkan (Association "Why not?"), interview by IRM researcher, 8 Dec. 2021.

[9] More examples are available here: https://internationalbudget.org/wp-content/uploads/Citizen-Budget-Guide.pdf.

[10] Halida Pašić (Min. of Finance and Treasury of BiH), comments provided to IRM in prepublication period, 22 Mar. 2022.

2.4. Commitment implementation

The table below assesses the completion for each commitment in the action plan.

Commitment	Completion: (no evidence available, not started, limited, substantial, or complete)
1. Open Data on Public Procurement in BiH	**Limited:** This commitment aimed to publish all BiH public procurement data that are collected through the public procurement portal. The Agency for Public Procurement of BiH stated it conducted an initial overview of the legislative framework, reviewing the Law on Free Access to Information and the Law on Protection of Personal Information, but it did not prepare an official or published analysis.[1] Other activities under this commitment did not take place. The agency had prepared to adapt procedures to the new potential amendments to the Law on Public Procurement, which were due to be passed by parliament, since they would require significant and rapid changes to the existing public procurement system.[2] In the end, parliament did not support these amendments. Also, the COVID-19 pandemic created new workloads for agency employees who had to conduct additional monitoring and evaluations of public procurement related to the pandemic.[3] Another obstacle to implementation was that the agency had not completed an agreement with GIZ to support this commitment as GIZ had already completed its program to support public institutions in BiH.[4] The agency identified a technical solution to implement the remaining activities and plans to allocate its own resources to implement this in the next action plan.[5]
2. Development of a web platform for online drafting of integrity plans in institutions	**Limited:** Although software for the web platform was developed, deployment of the platform did not occur since the Agency for the Prevention of Corruption and Coordination against Corruption of BiH could not secure external funding to purchase a host server.[6] The platform would include an interactive template for integrity plans, which could be adjusted to the needs of different institutions.[7] Training coordinators for integrity plans has not been implemented.[8] No significant progress has been made beyond planning for a testing phase and creating a user manual for the platform.[9]
3. Development of online training modules for civil servants in the process of drafting and implementing integrity plans	**Substantial:** Implementing activities under this commitment commenced prior to the adoption of the action plan. The Agency for the Prevention of Corruption and Coordination of the Fight against Corruption, in cooperation with the Foundation INFOHOUSE and with USAID support, implemented an online training platform designed for civil servants on integrity plans. The agency launched the online course in February 2019[10] and it is open to any individual upon registration. Only 61 participants have completed the course.[11]

	The training entails four parts. The first part is one single document listing the anti-corruption legislation for all levels of government. This list, however, only lists laws and not actual sections or parts directly relevant to civil servants. The second part includes various guides, such as the *Guidebook on the rules for developing and implementing an integrity plan for institutions in Bosnia and Herzegovina*. The third section includes samples of integrity questionnaires for different types of institutions. Finally, in the fourth section, an online test is available (Milestones 3.1 and 3.2 describe it as a survey). Upon full completion, the course participant receives an online certificate. In addition, supplementary course materials include two short videos from civil society on integrity plans and a web forum (although not a single post had been made on the forum by the end of the implementation period).[12] Considering the predominantly textual information in the course materials, participants could benefit from more interactive course features, particularly visuals.
4. Increase availability, openness, and use of official statistical data	**Substantial:** The Statistics Agency of BiH created and opened its new user-friendly web portal with open access to its statistical data in early 2019, just before the adoption of this action plan. The agency publishes its data (allowing direct downloads in Excel or PDF formats) and offers data filters and visualizations on its website. This data is organized into 29 thematic data groups, such as agriculture, construction, and communications.[13] The most viewed statistics in 2020 were population and labor market (salary) statistics.[14] The website also includes a calendar of data releases showing many new and updated data publications since 2019 but it is not clear that all data being produced is available in open formats; much of the data is still available only in PDF formats.[15] A 2021 EU report stated that Bosnia and Herzegovina remains to be aligned with the principles of the European Statistics Code of Practice, which also requires publishing data using open data standards.[16] The website includes infographics that provide monthly or thematic data in a visual manner, which the agency shares on its social media.[17] There is also information available as time-series data for longer periods to illustrate changes over time,[18] and datasets are accompanied by methodological documents that explain how data was collected.[19] The agency saw an increase in public access and interest in its statistical data. Website visitors grew from 3,404 in September 2020, to 10,238 visitors in March 2021.[20] Currently, there are around 530,000 unique page views.[21] Research shows data users in 2020 rated the timeliness and comparability of data lower than users in 2017, but they gave higher scores on availability, accuracy, and relevance of data compared to users in 2017.[22] A 2021 EU report states that statistics are only somewhat timely, relevant, and reliable.[23] The agency promoted its new web portal and tools in various conferences and workshops[24] and plans to create a promotional video and organize educational training.[25]

	The agency has plans for the next action plan to continue opening more data in user-friendly formats and organize thematic workshops for public institutions, CSOs, academic, and media.[26]
5. Involvement of civil society organizations in policy-making processes	**Limited:** The Ministry of Justice of BiH held three out of the eight planned workshops in person in major cities across the country with a total number of 60 participants.[27] Due to the COVID pandemic, the ministry did not hold further in-person workshops and instead organized three online workshops in 2021 for participants from across BiH.[28] The BiH Ministry of Justice organized and disseminated the call for workshops in collaboration with the Center for Civil Society Promotion (CCSP),[29] a nonprofit organization that has an extensive civil society network in the country. The call reached 500 CSOs directly by email and was promoted on websites of involved organizations and their social media. The Ministry of Justice collected partial feedback from the reduced number of workshops it held,[30] so it collaborated with the Institute for Youth Development KULT to implement a country-wide survey on the cooperation of nongovernment organizations with BiH institutions. Based on responses from 199 CSOs, the institute analyzed the state of nongovernment organizations and the use of existing cooperation mechanisms with BiH institutions and international organizations. They confirmed that only 9% of CSOs use the eKonsultacije platform to participate in consultations.[31] The survey also gathered suggestions on how to improve the platform and foster wider CSO involvement in public consultations on the state level. One of the most prevalent suggestions was to promote the platform more widely; another was to technically improve the platform to make it more user-friendly.[32] However, the Ministry of Justice has yet to revise state-level legislation as planned.[33] The Ministry plans to use the collected information to develop policy revisions that will be incorporated into amendments to the "Rules for consultations in preparation of legal regulations for state-level institutions."[34] Despite the number of organizations involved in the workshops and analysis, CSO representatives say that the commitment has not led to greater involvement of CSOs in public consultations.[35] They stated this might be due to the fact that CSOs do not see that comments and amendments are considered seriously by public institutions, as reports on consultation processes do not include justifications on why input is accepted or rejected.[36] Furthermore, they said that most citizens and even experts lack the ability to prepare amendments and phrase their suggestions in formal legal language.[37] A ministry report shows that the e-Konsultacije platform has 325 more registered legal and natural persons than in 2019 (currently standing at 2,695), and the number of consultations has risen too (from 281 in 2018, to 539 in 2019, and 543 in 2020).[38] However, over a third of institutions said they did not receive a single comment or any feedback for their consultations in 2020. Of the 31 institutions

	that did receive feedback, only 5 institutions rated feedback as good.[39]
6. Improving transparency in BiH institutions	**Complete:** In 2018, before the adoption of the action plan, the Council of Ministers of BiH adopted the Public Administration Reform Coordinator's Office of BiH (PARCO) Policy for proactive transparency and standards of proactive transparency, requiring state institutions to be proactively transparent.[40] PARCO organized several online and in-person workshops for state- and entity-level civil servants on the policy and standards, fulfilling Milestone 6.2.[41] To ensure compliance and monitor proactive transparency, PARCO conducted two surveys on implementation of policies noting an increase in institutional openness. In 2019, 63.46% of institutions surveyed adhered to the proactive transparency standards, and in 2020, this rating increased to 65.67% with 14 more institutions participating in the survey.[42] This positive change was reflected in views from representatives of civil society who said that the BiH government has opened up its data in recent years.[43] PARCO, in cooperation with the Agency for Statistics of BiH, plans to design an online survey to follow up on monitoring.[44]
7. Drafting the budget for citizens	**Complete:** For details regarding the implementation and early results of this commitment, see Section 2.3.

[1] Belma Sečibović and Dario Kihli (Agency for Public Procurement of BiH), interview by IRM researcher, 7 Dec. 2021.

[2] Radio Slobodna Evropa, "Parlamentarci BiH odbili izmjene Zakona o javnim nabavkama" [BiH parliamentarians reject amendments to the Law on Public Procurement] (25 May 2021), https://www.slobodnaevropa.org/a/parlamentarci-bih-odbili-izmjene-zakona-o-javnim-nabavkama-/31273138.html; Sečibović and Kihli, interview.

[3] Sečibović and Kihli, interview.

[4] Council of Ministers of Bosnia and Herzegovina, *Report On The Implementation Of The Action Plan Of The Council Of Ministers Of Bosnia And Herzegovina For The Implementation Of The Initiative "Open Government Partnership" For The Period 2019–2021* (Dec. 2020), http://ogp.ba/akcioni_plan/report-on-the-implementation-of-the-ap-com-of-bh-of-the-ogp-initiative-for-the-period-2019-2021/.

[5] BiH Public Procurement Agency, *Program Rada: Agencije Za Javne Nabavke Bosne I Hercegovine Za 2022. Godinu* [Program of Work: Public Procurement Agency of Bosnia and Herzegovina for 2022] (17 Jul. 2021), https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwj2tlu75eX0AhVQ6qQKHRxjDIYQFnoECAcQAQ&url=https%3A%2F%2Fekonsultacije.gov.ba%2Flegislationactivities%2Fdownloaddocument%3FdocumentId%3D1016398&usg=AOvVaw3XlG34rm0LWB7_yX7e-oep; Sečibović and Kihli, interview.

[6] Vladica Babic (Agency for the Prevention of Corruption and Coordination against Corruption of BiH), interview by IRM researcher, 13 May 2020.

[7] *Id.*

[8] Council of Ministers of Bosnia and Herzegovina, *Report On The Implementation Of The Action Plan Of The Council Of Ministers Of Bosnia And Herzegovina For The Implementation Of The Initiative "Open Government Partnership" For The Period 2019–2021.*

[9] *Id.*

[10] Agency courses are available here: http://obuke.apik.ba/course. To access the course materials, one must create a username and password. Agency for the Prevention of Corruption and Coordination against Corruption of BiH, "Online anti-corruption education is available to employees of public institutions in BiH" (27 Feb. 2019) http://apik.ba/aktuelnosti/saopcenja-za-javnost/default.aspx?id=1918&langTag=bs-BA

[11] The course is available here: http://obuke.apik.ba/course/view.php?id=2#section-0.

[12] Agency for the Prevention of Corruption and Coordination against Corruption of BiH, "APIK Sistem za učenje na daljinu" [APIK Distance Learning System] (accessed 29 Jun. 2020), http://obuke.apik.ba/course.

[13] Select "Statistike" from the main menu to see all data groups: https://bhas.gov.ba.

[14] BiH Statistics Agency, *Rezultati istraživanja o zadovoljstvu Agencija za statistiku Bosne i Hercegovine Korisnika* [Results of Customer Satisfaction Survey] (27 Jul. 2021), https://bhas.gov.ba/data/Dokumenti/Kvalitet/AZK2020_BS.pdf.

[15] *See* BiH Statistics Agency, Calendar (last accessed 1 Apr. 2022): https://bhas.gov.ba/Calendar/#.

[16] Directorate-General for Neighbourhood and Enlargement Negotiations, *Commission Staff Working Document: Bosnia and Herzegovina 2021 Report* (European Commission, 19 Oct. 2021), https://ec.europa.eu/neighbourhood-enlargement/bosnia-and-herzegovina-report-2021_en; Eurostat, "European Statistics Code of Practice — revised edition 2017" (16 Nov. 2017), https://ec.europa.eu/eurostat/web/products-catalogues/-/ks-02-18-142.

[17] BiH Statistics Agency, Facebook page: https://www.facebook.com/BHAS.BIH/.

[18] *See* the time series for prices: https://bhas.gov.ba/Calendar/Category/10.

[19] *See* https://bhas.gov.ba/Calendar/Category/10.

[20] Alen Mrgud (Agency for Statistics of BiH), interview by IRM, 7 Dec. 2021; Google Analytics, data of the bhas.gov.ba website, IRM researcher consulted the data on 7 Dec. 2021.

[21] *Id.*

[22] BiH Statistics Agency, *Rezultati istraživanja o zadovoljstvu Agencija za statistiku Bosne i Hercegovine Korisnika* [Results of Customer Satisfaction Survey].

[23] Directorate-General for Neighbourhood and Enlargement Negotiations, *Commission Staff Working Document: Bosnia and Herzegovina 2021 Report.*

[24] BiH Statistics Agency, "Nacionalna Konferencija - Otvoreni Podaci U BiH" [National Conference – Open Data in BiH] (17 Jun. 2021), https://bhas.gov.ba/News/Read/49; BiH Statistics Agency, "Konferencija o otvorenoj vlasti u Bosni i Hercegovini" [Conference on Open Government in Bosnia and Herzegovina] (12 Feb. 2020), https://bhas.gov.ba/News/Read/32; BiH Statistics Agency, "Radionica o proaktivnoj transparentnosti za institucije FBiH, RS i BDBiH" [Workshop on proactive transparency for the institutions of FBiH, RS and BDBiH] (30 Oct. 2019), https://bhas.gov.ba/News/Read/25; BiH Statistics Agency, "Konferencija - Digitalizacija bosanskohercegovačkog društva" [Conference - Digitization of Bosnian society] (21 Mar. 2019), https://bhas.gov.ba/News/Read/17; BiH Statistics Agency, "Radionica o proaktivnoj transparentnosti u javnoj upravi" [Workshop on proactive transparency in public administration] (22 Feb. 2019), https://bhas.gov.ba/News/Read/16.

[25] Council of Ministers of Bosnia and Herzegovina, *Report On The Implementation Of The Action Plan Of The Council Of Ministers Of Bosnia And Herzegovina For The Implementation Of The Initiative "Open Government Partnership" For The Period 2019–2021*; Mrgud, interview.

[26] Mrgud, interview.

[27] Council of Ministers of Bosnia and Herzegovina, *Report On The Implementation Of The Action Plan Of The Council Of Ministers Of Bosnia And Herzegovina For The Implementation Of The Initiative "Open Government Partnership" For The Period 2019–2021*; Vildan Hadžihasanović (Min. of Justice of BiH), interview by IRM researcher, 6 Dec. 2021.

[28] Vildan Hadžihasanović (Min. of Justice of BiH), comments sent to IRM during pre-publication period, 22 Mar. 2022.

[29] Akta.ba, "Edukacija za korištenje web platforme eKonsultacije za OCD" [Training for the use of the eConsulting web platform for CSOs] (15 Oct. 2019), https://www.akta.ba/najave/edukacija-za-koristenje-web-platforme-ekonsultacije-za-ocd/107755; Hadžihasanović, interview.

[30] Hadžihasanović, interview.

[31] 199 participants completed the survey. Institute of Youth Development KULT, *Analiza stanja nevladinih organizacija i korištenja postojećih mehanizama suradnje s institucijama BiH i međunarodnim organizacijama* [Analysis of the situation of non -governmental organizations use of existing cooperation mechanisms with BiH and international institutions organizations] (24 May 2021), https://www.mladi.org/en/resources/knowledge-treasure/news/8761-analysis-almost-half-of-organizations-in-bih-unaware-of-agreement-between-bih-council-of-ministers-and-ngos-in-bih.

[32] *Id.*

[33] Council of Ministers of Bosnia and Herzegovina, *Report On The Implementation Of The Action Plan Of The Council Of Ministers Of Bosnia And Herzegovina For The Implementation Of The Initiative "Open Government Partnership" For The Period 2019–2021*; Hadžihasanović, interview.

[34] Amendments to the rules were planned to be developed in 2020 and again in 2021. *See* Min. of Justice of Bosnia and Herzegovina, "Program Rada Ministarstva Pravde Bosne I Hercegovineza 2020. Godinu" [Work Program Ministries Of Justice Of Bosnia And Herzegovina For 2020] (26 Mar. 2020), http://www.mpr.gov.ba/ministarstvo/interno/default.aspx?id=10117&langTag=bs-BA; Min. of Justice of Bosnia and Herzegovina, "Program Rada Ministarstva Pravde Bosne I Hercegovineza 2021. Godinu" [Work Program Ministries Of Justice Of Bosnia And Herzegovina For 2021] (19 Oct. 2020), http://www.mpr.gov.ba/ministarstvo/interno/default.aspx?id=11059&langTag=bs-BA; Hadžihasanović, interview.

[35] Leila Bičakčić (Center for Investigative Journalism), interview by IRM researcher, 6 Dec. 2021; Danira Karović and Darko Brkan (Association "Why not?"), interview by IRM researcher, 8 Dec. 2021.

[36] Bičakčić, interview.

[37] *Id.*

[38] Min. of Justice, *Report on the Implementation of the Consultations Rules for Preparation of Regulation in Bosnia and Herzegovina for 2020* (Feb. 2021).

[39] *Id.* Based on the survey the Ministry of Justice conducted and responses from 55 state-level institutions (out of 64 registered on the platform), consultation processes are limited. Twenty institutions stated that they did not receive a single comment or any feedback for their consultations in 2020. Among the 31 institutions that received suggestions and comments, five institutions rated them as good, seventeen as satisfactory, and nine as not satisfactory. Institutions rated the expertise of legal and natural persons involved in the consultation as satisfactory or good.

[40] Council of Ministers of BiH, "Conclusion no.14 from the 160th Session of the Council of Ministers of BiH: Information on activities in the field of promoting proactive transparency and the need to adopt the Policy on proactive transparency and Standards and the Proposal for a proactive transparency policy and standards in public administration in Bosnia and Herzegovina" (3 Dec. 2018), https://www.savjetministara.gov.ba/saopstenja/sjednice/saopstenja_sa_sjednica/default.aspx?id=29618&langTag=bs-BA

[41] Vedrana Faladzic and Mubera Begic (PARCO), interview by IRM researcher, 6 Dec. 2021; Public Administration Reform Coordinator's Office (PARCO), "Online trening za predstavnike medija: Proaktivna transparentnost – zagovaranje otvorene vlasti" [Online training for media representatives: Proactive transparency - advocating for open government] (6 Apr. 2021), https://parco.gov.ba/2021/04/06/online-trening-za-predstavnike-medija-proaktivna-transparentnost-zagovaranje-otvorene-vlasti/; PARCO, "Agencija za državnu službu BiH organizira webinar: 'Proaktivna transparentnost u javnoj upravi'" [The BiH Civil Service Agency is organizing a webinar: "Proactive transparency in public administration"] (6 Nov. 2020), https://parco.gov.ba/2020/11/06/agencija-za-drzavnu-sluzbu-bih-organizira-webinar-proaktivna-transparentnost-u-javnoj-upravi/; PARCO, "Održana online konferencija 'Proaktivna transparentnost u javnoj upravi u BiH'" [Online conference "Proactive Transparency in Public Administration in BiH" Held] (3 Sep. 2020), https://parco.gov.ba/2020/09/30/odrzana-online-konferencija-proaktivna-transparentnost-u-javnoj-upravi-u-bih/; PARCO, "Online događaj 'Proaktivna transparentnost u javnoj upravi u BiH' u ponedjeljak 28. septembra 2020. godine u 12.00 sati" [Online event "Proactive Transparency in Public Administration in BiH" on Monday, September 28, 2020 at 12.00] (25 Sep. 2020), https://parco.gov.ba/2020/09/25/online-dogadaj-proaktivna-transparentnost-u-javnoj-upravi-u-bih-u-ponedjeljak-28-septembra-2020-godine-u-12-00-sati/; PARCO, "Konferencija o transparentnosti u javnoj upravi 'Proaktivna transparentnost i javna uprava u BiH — jučer, danas, sutra'" [Conference on Transparency in Public Administration "Proactive Transparency and Public Administration in BiH - Yesterday, Today, Tomorrow"] (26 Sep. 2019), https://parco.gov.ba/2019/09/26/konferencija-o-transparentnosti-u-javnoj-upravi-proaktivna-transparentnost-i-javna-uprava-u-bih-jucer-danas-sutra/.

[42] Faladzic and Begic, interview; and PARCO, "Statistika o ispunjenosti standarda u institucijama BiH" [Statistics on meeting the standards in BiH institutions] (accessed Apr. 2022), https://parco.gov.ba/en/proaktivna-transparentnost/statistika/.

[43] Karović and Brkan, interview.

[44] Faladzic and Begic, interview.

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 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. Bosnia and Herzegovina **did not act** contrary to OGP process.[1]

Please see Annex I for an overview of Bosnia and Herzegovina's performance implementing *OGP Participation and Co-Creation Standards* throughout the action plan implementation.

Table 3.2: 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[3]	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		

While implementing the action plan, there was regular cooperation between state institutions and CSOs. The Advisory Council held four meetings in 2020 and another four in 2021. The government point of contact reports that there was regular email and phone communication through the implementation period.[4] Through meetings and regular exchanges of information, members of the multistakeholder body provided feedback that was used to design and implement activities as part of commitments. Before Advisory Council meetings, all members were able to suggest agenda items for discussion. After meetings, the Ministry of Justice of BiH prepares the minutes, shares them with all members, and makes them available online.[5] CSO members of the Advisory Council could freely express their opinions and their suggestions were discussed in the meetings, but a lack of political will, budget, or capacity within institutions limited the opportunity for putting any suggestions into practice.[6]

[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 country OGP website in line with IRM guidance.

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

[3] The OGP defines Standards for participation and co-creation that participating members must meet in the development and implementation of its action plan in order to act in accordance with the OGP process. In accordance with these conditions, Bosnia and Herzegovina did not act contrary to the OGP process during the development of the 2019-2021 action plan.

[4] Vildan Hadžihasanović (Min. of Justice of BiH), interview by IRM, 6 Dec. 2021.

[5] Min. of Justice of BiH, "OGP" (28 Feb. 2022), http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA.

[6] Leila Bičakčić (Center for Investigative Journalism), interview by IRM, 6 Dec. 2021; Danira Karović and Darko Brkan (Association "Why not?"), interview by IRM 8 Dec. 2021.

3.2 Overview of Bosnia and Herzegovina's performance throughout action plan implementation

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

Multistakeholder Forum	During Development	During Implementation
1a. Forum established: The Advisory Council for the Open Government Partnership Initiative includes relevant state-level institutions and CSOs in development and implementation of the action plan.[1]	Green	Green
1b. Regularity: After adopting the action plan, the Advisory Council held four meetings in 2020 and four in 2021.[2]	Yellow	Green
1c. Collaborative mandate development: Members of the Advisory Council jointly develop its remit, membership, and governance structure.[3]	Green	NA
1d. Mandate public: There is some information about OGP on the Information on Ministry of Justice and also PARCO websites, but no information is available on the Advisory Council's remit, membership, and governance structure.[4]	Yellow	Yellow
2a. Multistakeholder: The Advisory Council includes both government and nongovernment representatives.[5]	Green	Green
2b. Parity: Formally, there are numerically fewer civil society members than institutional members in the multistakeholder forum. Civil society members felt that there was parity in practice, and minutes of meetings show there were equal numbers present at meetings of the multistakeholder forum. According to the Advisory Council Rulebook, CSO members can veto any decision and thus have equal decision-making power.[6]	Green	Green
2c. Transparent selection: The nongovernment members of the Advisory Council are selected through a fair and transparent process.[7]	Green	NA
2d. High-level government representation: The Advisory Council includes mostly mid-level representatives without decision-making authority from government. Only one member is an elected high ranking official.[8] During the implementation period, the high-ranking official was informed on all decisions made by the Advisory Council but could not attend the majority of meetings due to other obligations.[9]	Yellow	Yellow

3a. Openness: In principle, the Advisory Council can accept input and representation on the action plan process from any civil society or other stakeholder outside the forum.[10] During the implementation period, institutions collaborated with several CSOs outside the Advisory Council on implementation of several milestones.	Green	Green
3b. Remote participation: The Advisory Council organized remote participation for some meetings and events. During the implementation phase, and due to COVID-19 pandemic, the Advisory Council held almost half of their meetings online.[11]	Red	Green
3c. Minutes: Minutes of formal multistakeholder meetings are kept. The minutes are published on the Ministry of Justice website.[12] Minutes of meetings from 2021 have not been published.	Yellow	Yellow

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

Action Plan Implementation	
4a. Process transparency: Although the Advisory Council reactivated the OGP country website, information is not updated regularly. The Ministry of Justice of BiH and PARCO websites publish the minutes of the Advisory Council meetings, which include information on commitment progress.[13]At the end of the implementation period, the Ministry of Justice of BiH took over maintenance and management of the national OGP website.	Yellow
4b. Communication channels: Particularly during times of intense OGP activity, the Advisory Council facilitated direct communication with stakeholders to respond to action plan process questions.[14] Cantonal governments (Sarajevo and Tuzla) and CSOs have proactively expressed interest in the OGP process, and the General Secretariat of the Council of Ministers invited CSOs for cooperation on OGP matters.[15]	Yellow
4c. Engagement with civil society: The Advisory Council held four meetings in 2020. The Advisory Council held four meetings between July and December 2021.[16] Furthermore, as part of commitment implementation, several state-level institutions organized consultations and meetings with CSOs.[17]	Green
4d. Cooperation with the IRM: The Advisory Council shared the design report with its stakeholders through email correspondence.[18] However, the design report is not shared on the OGP or other institutional websites.[19]	Yellow
4e. MSF engagement: During its meetings, Advisory Council members discussed ongoing progress on commitments and shared information on how to improve implementation and address new challenges in future action plans.	Green

4f. MSF engagement with self-assessment report: At the time of writing this report, the government had published its self-assessment report on the ogp.ba website. This report was prepared based on the input of members of the Advisory Council, and the report was shared with all members prior to its adoption by the Council of Ministers of BiH.[20]	Green
4g. Repository: Information about OGP processes and events are shared on three different websites, but are not regularly updated. The country OGP website (ogp.ba, originally led by CSOs) includes information on past and some ongoing events, resources, analyses, and stakeholders, while the Ministry of Justice publishes formal materials related to the Advisory Council establishment, meetings, and decisions.[21] PARCO also has a webpage on OGP with basic information.[22] The OGP website was transferred to the Ministry of Justice of BiH at the end of 2021, which now runs the website on behalf of the Advisory Council.	Yellow

[1] Official Gazette of BiH, Number 94/16 "O Osnivanju Savjetodavnog Vijeća Inicijative "Partnerstvo Za Otvorenu Vlast" [Decision on establishment of the Advisory Council for the Open Government Partnership Initiative], (13 Oct. 2016) http://sluzbenilist.ba/page/akt/i9huGZru7aY=; Official Gazette of BiH, Number 72/19 "O Izmjenama Odluke O Osnivanju Savjetodavnog Vijeća Inicijative "Partnerstvo Za Otvorenu Vlast" [Decision on changes and amendments of the Decision on establishment of the Advisory Council for the Open Government Partnership Initiative] (5 Aug. 2019) http://sluzbenilist.ba/page/akt/wHQ658FdR4U=; PARCO, "Dragan Ćuzulan elected chairman of the Advisory Council of the OGP Initiative" (4 Jun. 2018) https://parco.gov.ba/en/2018/06/04/dragan-cuzulan-izabran-za-predsjedavajuceg-savjetodavnog-vijeca-ogp-inicijative/; Min. of Justice of BiH, "Minutes of the first meeting of the Advisory Council for the Open Government Partnership Initiative" (20 Jun. 2018) http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=en-US; Min. of Justice of BiH, "Minutes of the second meeting of the Advisory Council for the Open Government Partnership Initiative" (30 Aug. 2018) http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=en-US; Min. of Justice of BiH, "Notes from the Meeting of the Advisory Council for the Open Government Partnership Initiative" (13 Feb. 2020) http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=en-US.
[2] Min. of Justice of BiH, "OGP" (28 Feb. 2022), http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA.
[3] Goran Kucera (Min. of Justice of BiH), interview by IRM researcher, 10 Jun. 2020; Nedzad Selman and Goran Kucera (Min. of Justice of BiH), interview by IRM researcher, 14 Feb. 2020; PARCO, "Dragan Ćuzulan elected chairman of the Advisory Council of the OGP Initiative;" Min. of Justice of BiH, "Minutes of the first meeting of the Advisory Council for the Open Government Partnership Initiative;" Min. of Justice of BiH, "Minutes of the second meeting of the Advisory Council for the Open Government Partnership Initiative;" Min. of Justice of BiH, "Notes from the Meeting of the Advisory Council for the Open Government Partnership Initiative."
[4] See http://ogp.ba, http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA, and https://parco.gov.ba/ogp/.
[5] Official Gazette of BiH, Number 94/16 "O Osnivanju Savjetodavnog Vijeća Inicijative "Partnerstvo Za Otvorenu Vlast" [Decision on establishment of the Advisory Council for the Open Government Partnership Initiative], (13 Oct. 2016) http://sluzbenilist.ba/page/akt/i9huGZru7aY=; Official Gazette of BiH, Number 72/19 "O Izmjenama Odluke O Osnivanju Savjetodavnog Vijeća Inicijative "Partnerstvo Za Otvorenu Vlast" [Decision on changes and amendments of the Decision on establishment of the Advisory Council for the Open Government Partnership Initiative] (5 Aug. 2019) http://sluzbenilist.ba/page/akt/wHQ658FdR4U=
[6] Kucera, interview; Selman and Kucera, interview; PARCO, "Minutes from the Inauguration Meeting of the Advisory Council for the Open Government Partnership Initiative;" Min. of Justice of BiH, "Minutes of the first meeting of the Advisory Council for the Open Government Partnership Initiative;" Min. of Justice of BiH, "Minutes of the second meeting of the Advisory Council for the Open Government Partnership Initiative;" Min. of Justice of BiH, "Notes from the Meeting of the Advisory Council for the Open Government Partnership Initiative."
[7] Min. of Justice of BiH, "Javani Poziv: organizacijama civilnog društva za predlaganje 4 (četiri) kandidata/kinje i njihovih zamjenika/ica za članove/ice i zamjenike članova/ica Savjetodavnog vijeća inicijative 'Partnerstvo za otvorenu vlast'" [Public call to civil society organizations for proposing their 4 (four) candidates and their deputies for members and alternate members of the Open Government Partnership Advisory Council] (accessed Apr. 2022), http://www.mpr.gov.ba/ministarstvo/dokumenti/Javni%20poziv_Bos.pdf.
[8] Official Gazette of BiH, Number 94/16 "O Osnivanju Savjetodavnog Vijeća Inicijative "Partnerstvo Za Otvorenu Vlast" [Decision on establishment of the Advisory Council for the Open Government Partnership Initiative], (13

Oct. 2016) http://sluzbenilist.ba/page/akt/i9huGZru7aY=; Official Gazette of BiH, Number 72/19 "O Izmjenama Odluke O Osnivanju Savjetodavnog Vijeća Inicijative "Partnerstvo Za Otvorenu Vlast" [Decision on changes and amendments of the Decision on establishment of the Advisory Council for the Open Government Partnership Initiative] (5 Aug. 2019) http://sluzbenilist.ba/page/akt/wHQ658FdR4U=.

[9] Vedrana Faladzic and Mubera Begic (PARCO), interview by IRM researcher, 6 Dec. 2021.

[10] *Id.*

[11] Ministry of Justice of BiH, OGP, 28 Feb. 2022, http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA

[12] Bosnia and Herzegovina OGP website: http://ogp.ba; Ministry of Justice of BiH, OGP, 28 Feb. 2022, http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA; PARCO, OGP, https://parco.gov.ba/ogp/

[13] Ministry of Justice of BiH, OGP, 28 Feb. 2022, http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA; PARCO, OGP, https://parco.gov.ba/ogp/

[14] Min. of Justice of BiH, "OGP."

[15] Danira Karović and Darko Brkan (Association "Why not?"), interview by IRM researcher, 8 Dec. 2021.

[16] Min. of Justice, minutes of meetings provided to IRM researcher via email, 8 Feb. 2022.

[17] Council of Ministers of Bosnia and Herzegovina, *Report On The Implementation Of The Action Plan Of The Council Of Ministers Of Bosnia And Herzegovina For The Implementation Of The Initiative "Open Government Partnership" For The Period 2019–2021* (Dec. 2020), http://ogp.ba/akcioni_plan/report-on-the-implementation-of-the-ap-com-of-bh-of-the-ogp-initiative-for-the-period-2019-2021/.

[18] Vildan Hadžihasanović (Min. of Justice of BiH), interview by IRM researcher, 6 Dec. 2021.

[19] Bosnia and Herzegovina OGP website: http://ogp.ba; Min. of Justice of BiH, "OGP;" PARCO, "OGP" (accessed 6 Apr. 2022), https://parco.gov.ba/ogp/.

[20] Vildan Hadžihasanović (Min. of Justice of BiH), evidence provided to IRM via email, 22 Mar. 2022.

[21] Bosnia and Herzegovina OGP website: http://ogp.ba; Min. of Justice of BiH, "OGP."

[22] PARCO, "OGP."

IV. Methodology and Sources

Research for the IRM reports is carried out by in-country 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.

This review was prepared by the IRM in collaboration with Elma Demir and was externally expert reviewed by Jeff Lovitt. The IRM methodology, quality of IRM products, and review process is overseen by the IRM's International Experts Panel (IEP).

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 Bosnia and Herzegovina's design report 2019–2021.

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 action plans to foster dialogue among stakeholders and improve accountability.

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

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:**
  - o 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?
  - o 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:
  - o Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
  - o Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
  - o 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:
  - o Identify the social, economic, political, or environmental problem;
  - o Establish the status quo at the outset of the action plan; and
  - o Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the IRM implementation report.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the IRM implementation report.

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."

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* (OGP, 16 Sep. 2017), https://www.opengovpartnership.org/documents/irm-procedures-manual.