Independent Reporting Mechanism

Results Report: Liberia 2020-2022



Executive Summary

Government agencies' limited funding and commitment resulted in a low level of implementation and few early open government results from Liberia's fourth action plan. However, modest progress was made toward establishing systems to disclose public contract and beneficial ownership information. Coordination among government, civil society, and international partners was a key ingredient for these reforms.

Early Results

Liberia's fourth action plan continued anticorruption efforts established under previous plans. The country made modest progress toward transparency of government contracts and beneficial owners of companies. These reforms represent two of the five commitments highlighted as promising in Liberia's Action Plan Review.¹

Financial constraints and leadership turnover inhibited implementation of the three other promisina, commitments identified as continuing challenges seen in previous action Leadership challenges particularly plans. impacted Anti-Corruption the Liberia Commission, responsible for Commitment 4, which aimed to pass long-awaited anti-

LEVEL OF COMPLETION0/12Complete or
substantially complete
commitmentsEARLY RESULTS2/122/12Commitments with
early results0/12Commitments with major
or outstanding early
results

IMPLEMENTATION AT A GLANCE

COMPLIANCE WITH MINIMUM REQUIREMENTS

Acting according to OGP process.

corruption legislation. The Ministry of Health had taken initial steps to establish and train County Health Boards under Commitment 6. However, the boards were limited to five counties and had not yet become operational by the time of assessment.

The marginal early results achieved under Commitments 1 and 5 on open contracting and beneficial ownership transparency were facilitated by strong ownership by the respective lead agencies and technical and financial support from civil society, government, and international partners. Reformers continued to build toward the necessary institutional and legal frameworks for beneficial ownership and open contracting. However, the reformers had not achieved their overall objective to disclose new information to the public by the end of the implementation period.

Completion

Half of the 12 commitments are carried over from the previous action plan and continue Liberia's focus on fighting corruption through open government. New policy areas included opening healthcare management, transparent tax revenue management, youth protection of civic space, and fighting gender-based violence.

The level of completion was lower than that of the previous action plan. Of the twelve commitments, seven achieved a limited level of completion and four were not started. These



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include commitments related to access to justice, citizen participation in the legislature, preventing gender-based violence, and youth protection of civic space. In the case of commitments by the legislature and the Ministry of Youth and Sports, the absence of a dedicated point of contact indicates a lack of ownership by the implementing agency. Despite attempts to reach the commitment point of contact, the Independent Reporting Mechanism (IRM) did not receive sufficient evidence on Commitment 8 on transparent tax revenue management to assess completion.

Half of the commitments were assessed as having a marginal impact on open government practices. Commitments 1 and 5 are analyzed in-depth in this report, as they represent national priorities and build toward ambitious long-term open government reforms. The remaining commitments that achieved marginal early results, such as Commitment 4 on anti-corruption legislation and Commitment 6 on transparent and participatory healthcare management, made modest progress without significant early results visible by the end of the implementation period. Under Commitment 12, iLab and the Open Government Partnership (OGP) Liberia Secretariat monitored the government's COVID-19 response, but the IRM did not find evidence on the impact or use of this information.

The remaining six commitments are assessed as having no early results to report yet. As detailed in the Annex, obstacles to implementation included limited funding, a lack of ownership by the responsible agency, and administrative turnover. The overall level of open government results is similar to that of the previous action plan.

Participation and Co-Creation

The Liberian OGP Secretariat works with the Steering Committee and Multi-Stakeholder Forum to oversee the OGP process. The Steering Committee includes government and civil society representatives chosen from the broader Multi-Stakeholder Forum based on their responsibility for commitments in the current action plan. The co-creation process continues to include the same set of civil society organizations based in Monrovia. This is reflected by the action plan, in which half of the commitments are nearly identical to those in the previous plan. The Secretariat made efforts to reach a broader audience through sensitization and radio sessions. The IRM recommends that the Secretariat seek potential partners beyond the capital and use radio outreach to collect input from the public throughout co-creation and implementation.

Implementation in Context

The COVID-19 pandemic pulled government attention and funding away from implementation of the action plan. Social distancing restrictions caused the Steering Committee and Multi-Stakeholder Forum discussions to be held online and over WhatsApp. Additionally, conflict around the leadership structure at the Liberia Anti-Corruption Commission inhibited implementation of Commitment 4.



¹ "Liberia Action Plan Review 2020-2022," Open Government Partnership, <u>https://www.opengovpartnership.org/documents/liberia-action-plan-review-2020-2022/</u>.

Table of Contents

Section I: Key Observations	2
Section II: Implementation and Early Results	
Section III. Participation and Co-Creation	
Section IV. Methodology and IRM Indicators	17
Annex I. Commitment Data	19



Section I: Key Observations

Liberia's fourth action plan continues the trend of ambitious commitments focused on anticorruption that face significant obstacles to implementation. Independent Reporting Mechanism (IRM) analysis revealed three observations that could inform future action plan cycles: the importance of a committed coalition of reformers to support a reform, the possibility to use radio and other media tools to broaden participation in the Open Government Partnership (OGP) process, and the opportunity for Liberia to take a strategic approach to action plan design and submission.

Observation 1: Coordination among a coalition of government, civil society, the private sector, and international partners is a key ingredient behind Liberia's most impactful commitments.

This assessment clarifies the necessity for strong government support and coordination with nongovernment partners to implement commitments. Commitment 1, to advance beneficial ownership, demonstrates a productive partnership between the Liberia Business Registry, the Liberia Extractives Transparency Initiative, and Open Ownership through the Open Extractives Programme.² The director general of the Liberia Business Registry has provided a driving force behind the reform.³ International partners have provided financial and technical support, such as learning opportunities from other countries.

Commitment 4 on passing anti-corruption laws and Commitment 5 on open contracting have also benefited from a strong ecosystem of support. Actors across these three commitments are in loose networks such as the broader OGP Multi-Stakeholder Forum (MSF), the 10-member Steering Committee, the National Integrity Forum (NIF), and others. The NIF was started in 2009 and revived in 2020 by the Center for Transparency and Accountability in Liberia (CENTAL) with support from the Swedish International Development Cooperation Agency (SIDA).⁴ There appears to be natural alignment between the NIF and OGP objectives and opportunity to engage open government reformers from outside Monrovia.

Observation 2: The OGP Liberia team could use its media engagement to broaden public participation throughout the action plan cycle.

Conversation with the OGP point of contact,⁵ Nathan Bengu,⁶ and civil society organizations (CSOs) highlighted that the media is an important partner to reach citizens, local CSOs, educational institutions, and local government. The Public Procurement and Concessions Commission (PPCC) used radio jingles, and other members of the Liberia team engaged with local and community radio stations to share messages on the public procurement process, the OGP principles, and integrity. The OGP Secretariat has stated that it has a media strategy. However, the IRM has not been able to review the strategy.⁷

Sierra Leone provides an example of how Liberia can take its media engagement to the next level to advance beyond information sharing to also gathering public input. In Sierra Leone, the OGP team used popular radio programs during the co-creation period not only to sensitize the public on open government and the OGP process but also to solicit feedback on draft commitments through call-in shows. Some episodes focused on the action plan generally and others featured a



member of the OGP Steering Committee discussing a particular draft commitment's objective, milestones, and reason for inclusion.⁸

A clear and focused media strategy could seek to build coalitions of reformers around commitments and engage potential partners beyond Monrovia. Radio could complement online platforms as the media to ensure a transparent and participatory OGP process. Radio could be used to share information on the co-creation timeline and opportunities to get involved, as required under Standard 3 in the OGP Participation and Co-Creation Standards. The radio could also be a useful tool to ensure Standard 5 is met by updating civil society on implementation progress and collecting comments.⁹ Working with the media would serve in soliciting citizens' priorities on policies and problems at co-creation of the action plan and during the implementation process. For the upcoming co-creation process, there is potential for the Liberia Secretariat to sharpen the target audience; develop strategies on when and how to reach them; hone main messages to communicate; and solicit information that needs to be collected.

Observation 3: Significant financial and political constraints continue to inhibit Liberia's implementation of ambitious open government reforms across action plans.

Liberia has continued several ambitious open government reforms across multiple action plans, such as open contracting and beneficial ownership transparency. However, Liberia has faced significant financial, leadership, and institutional obstacles to implementing such reforms. The OGP Liberia Secretariat, Steering Committee, and MSF can consider developing an overarching open government strategy. This strategy can establish the long-term objectives, which are then translated to feasible commitments in OGP action plans. The strategy can be informed by existing government multi-year plans and possibly already committed or in-the-pipeline commitments by multilateral donors. Some countries, such as Tunisia, have committed to developing an open government strategy through their OGP action plan.¹⁰ The Secretariat is encouraged to review the new flexibility afforded in OGP action plan submission to strategically align the action plan with electoral and budget cycles. Likewise, stakeholders can consider whether a two- or four-year action plan would best advance national open government objectives.¹¹

Commitment 1 on beneficial ownership transparency and Commitment 5 on open contracting exemplify ambitious reforms whose open government results did not come to fruition within a single action plan period. This action plan saw broad consultations on the regulations and forms needed to capture beneficial ownership information. However, the intended activities to establish the beneficial ownership register and publish information were not achieved. Support from Open Ownership was a significant factor in advancing this commitment. Implementers are encouraged to design future commitments with milestones that balance feasibility with ambition. Similarly, commitment drafters should consider obstacles to implementation when carrying an incomplete commitment into the following action plan. The OGP Secretariat is encouraged to review draft action plans to assess whether commitments carried over from previous plans have been sufficiently adapted to account for obstacles to implementation.

² "Opening Extractives," Open Ownership, https://www.openownership.org/en/topics/opening-extractives/.

³ Favour Ime (Regional Manager, Africa and Middle East, Open Ownership), interview by the IRM, 31 October 2022.

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⁴ Members include Liberia Anti-Corruption Commission (LACC), Public Procurement and Concessions Commission (PPCC), General Auditing Commission (GAC), Federation of Liberian Youths (FLY), Press Union of Liberia (PUL), Governance Commission (GC), Center for Transparency and Accountability in Liberia (CENTAL), Civil Service Agency (CSA), Catholic Justice and Peace Commission (JPC), Corporate Responsibility Forum (CRF), and Liberia Extractive Industries Transparency Initiative (LEITI), among others.

⁵ Ralph G. Jimmeh (OGP point of contact), interviews by the IRM, 19 October 2022 and 1 November 2022.

⁶ Nathan Bengu (director of communications, Public Procurement Concessions Commission), interview by the IRM, 24 October 2022.

⁷ A copy of the strategy had not been received by the time of writing this report. This is based on Facebook posts on the OGP Liberia Facebook page.

⁸ "Sierre Leone Action Plan Review. 2021-2023 – For Public Comment," Open Government Partnership, 13 February 2023, https://www.opengovpartnership.org/documents/sierra-leone-action-plan-review-2021-2023-for-public-comment/.

⁹ "OGP Participation and Co-Creation Standards," Open Government Partnership, <u>https://www.opengovpartnership.org/ogp-participation-co-creation-standards/</u>.

¹⁰ "Defining the Open Government Strategic Priorities in Tunisia (TN0056)," Open Government Partnership, <u>https://www.opengovpartnership.org/members/tunisia/commitments/tn0056/</u>.

¹¹ OGP National Handbook: Rules + Guidance for Participants (Open Government Partnership), 18, <u>https://www.opengovpartnership.org/wp-content/uploads/2022/03/OGP-National-Handbook-2022.pdf</u>.



Section II: Implementation and Early Results

The following section looks at the two commitments or clusters that the IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments or clusters identified as promising in the Action Plan Review as a starting point. After verification of completion evidence, the IRM also took into account commitments or clusters that were not determined as promising but that, as implemented, yielded significant results.

Commitment 1: Beneficial Ownership Transparency [Liberia Business Registry]

Context and Objectives:

Liberia's commitment on beneficial ownership transparency aimed to build an open, public, and machine-readable online register in the Liberia Business Registry (LBR). This commitment had three milestones: set up a coordination committee, maintain an up-to-date portal backed up by dedicated staff and mandatory reporting requirements, and develop a system for data verification.

This commitment was continued from the 2017–2019 action plan and was moved from the Liberia Anti-Corruption Commission (LACC) to the LBR, which holds the mandate over business registration and licensing information. Appointment of the LBR as the responsible implementing agency facilitated implementation of this commitment.

The Tax Justice Network's Financial Secrecy Index (2022) reports that Liberia's scope of financial secrecy is at 73/100.¹² The country loses approximately USD 145.5 million in tax each year to global tax abuse, which the Tax Justice Network equates to 427.41% of the health budget.¹³ As noted by Liberia Extractive Industries Transparency Initiative (LEITI), a beneficial ownership (BO) regime would "help to curtail tax evasion, fight fraud and other forms of corruption leading to robust mobilization of domestic resources."¹⁴

Did It Open Government? Marginal

This commitment has marginally contributed to open government practices by continuing to build a legal and institutional framework for disclosure of information on the beneficial owners of companies. Specifically, implementation has advanced civic participation, as a broad coalition of civil society and government partners collaborated to develop regulations and forms for beneficial ownership disclosure. Once a public beneficial ownership portal is established, these reforms are expected to also strengthen government transparency and accountability.

This commitment is assessed as having achieved a limited level of completion by the end of the implementation period. There was progress made under milestones 1 and 3. These are important foundational activities for beneficial ownership transparency. However, overall completion of this commitment did not include implementation of the milestone with the greatest potential impact—milestone 2, to build and open a public and machine-readable online register of beneficial ownership in the LBR.

The LBR, with support from government agencies and local and international civil society organizations (CSOs), took steps to address issues raised in the IRM Action Plan Review and Open Ownership Scoping Report.¹⁵ Most importantly, the LBR has shown strong ownership and intention to see action in this commitment. As highlighted by Favour Ime of Open Ownership,

movement in BO in Liberia and pulling together of stakeholders would not have been possible without the leadership and ownership of the director general of the LBR. Ime stated, "LBR has put the weight on the matter, his voice is the loudest, he wants to question and pass it on to staff. He has been behind and in front of the consultation, in awareness raising campaign in regions—he was there for three of the regions."¹⁶

The progress made represents noteworthy incremental steps over the implementation period. An analysis of the progress, intentional investment, and continued commitment has the potential to help achieve greater open government results in the longer term, if the commitment is carried over to the next action plan, with more feasible milestones.

Changes over the implementation period

Fundamental steps were taken over the 2020–2022 action plan that have potential to move this commitment forward, if it continues in the next NAP.

Drafting of the BO regulation and forms

Interviews with Ime¹⁷ from Open Ownership and Samson Dee,¹⁸ director general of the LBR, indicate that the Beneficial Ownership Forms and Regulations were drafted in consultation with government and CSO stakeholders. These stakeholders include Liberia's Financial Intelligence Unit (FIU), the Liberia Revenue Authority (LRA), the Ministry of Foreign Affairs (MFA), LEITI, LBR, the Liberia Petroleum Authority, the Bureau for Concessions, private companies, the Accountability Lab, and the Liberian Bar Association. In July 2022, Open Extractives hosted an Anglophone Peer Exchange Programme that brought together implementing agencies from Ghana, Liberia, Nigeria, and Zambia, countries that are also undertaking beneficial ownership transparency reforms.¹⁹ These actors shared challenges, successes, and best practices on BO. Launch,²⁰ review, and sensitization on the draft regulations²¹ and forms²² were after the NAP implementation period.²³

This process contributed to all the milestones. Conversations with Ime²⁴ and Dee²⁵ indicated that there is a National Steering Committee involved in the process. This committee is to receive the final version of the forms and regulations before they are submitted to the Ministry of Foreign Affairs for assent. This committee was consulted in establishing the best practices in beneficial ownership transparency across technical, regulatory, legislative, and administrative parameters in Liberia. Using the Open Ownership nine principles of effective beneficial disclosure,²⁶ during consultations in August 2022, the committee made critical decisions that informed drafting of the regulations and forms. These consultations were important in raising local nuances that were useful in developing the draft.

The draft regulations²⁷ introduce requirements to include beneficial ownership in current business registration forms; a system for data verification to standardize ownership data; and clarity on sanctions for non-compliance, submitting wrong/false information. The regulations empower LBR to take the necessary steps to enforce the provisions of the primary law. The National Steering Committee shared the draft regulations and forms for feedback and validation in November 2022. Dee stated his hope that the regulations would be adopted in early 2023.²⁸

What stands out from this process is the time spent in consultation. From Ime's²⁹ point of view, that time was critical in ensuring that most actors were on board. "A robust regulatory framework is instrumental in serving as a solid foundation for the development of a BO register," Ime said.



The Liberia Scoping Report notes that while the forms and regulations are in place, "the real impact of BO data lies in its utility." This is only possible if any many people, organizations, and companies are aware of them. "The BO data is available in a structured format which allows data to be easily analyzed and linked with other databases."

Looking Ahead:

The progress shared above demonstrates that Liberia has built up momentum in pushing beneficial ownership in the country. Involvement of stakeholders—government, CSOs, private companies—and technical and funding partnerships have contributed to steps achieved so far. Overall, the Open Extractives Programme forms a productive partnership in achieving a commitment around beneficial ownership over the next three to five years. Ime noted that Open Ownership will host BO symposiums where Liberia could showcase what it is doing under BO, thus positioning itself for additional funding.³⁰

Recommendations shared by Ime,³¹ the Scoping Study Report,³² and Dee³³ could inform the drafting of a commitment around beneficial ownership:

- It was clear from the engagement and awareness-raising sessions that CSOs and citizens across the country were involved in the process and received information on what was happening. However, there is a need to involve more private companies in the process. This is something the Open Extractives Programme plans to do in testing the BO forms and receiving feedback as the draft forms and regulations are finalized.³⁴
- The BO online registry is not yet up. Interviews noted that the Government of Liberia has mandated LBR to work with LEITI, Liberal Petroleum Revenue Authority (LPRA), and other relevant government agencies to develop, design, and establish the register.³⁵ LPRA has purchased software for the BO register.³⁶ It will focus first on the extractives sector and subsequently everything else. A key recommendation from the Liberia Scoping Report is to use rollout and use of the extractives BO register as a pilot. This will allow LBR to include learnings in the rollout of the complete BO register. This worked in Nigeria and Armenia.
- With the online register not up and running, a hybrid approach will likely be adopted paper and online forms to fully transition to online forms. Recommendations around this include accompanying paper forms and a Data Submission Manual with guidance on how to fill in the forms to support data verification. Involving companies in developing and testing the forms will also facilitate user-friendliness and requests for information that companies are reasonably expected to have.³⁷
- Consider how can the BO portal link with the procurement portal, under development? How can LBR bring PPCC into the conversation?³⁸
- There is progress in pulling together the portal, and the draft regulations and forms are in the process of testing and finalization. With this progress, LBR will need to ensure that staff is available to manage the portal and process. Samson Dee mentioned that staff had been identified for this,³⁹ and Favour Ime shared that there are plans to have targeted training of individuals and departments over the next couple of months.⁴⁰
- The IRM recommends simplifying and being specific in commitment milestones (e.g., approval and rollout of the draft regulations and forms); sensitizing the approved forms and regulations to private sector, CSOs, and government actors; finalizing contracting for the development of the data portal; using the paper BO forms and validating the verification process; staffing; and training and equipping of dedicated staff.

Open Government Partnership

Commitment 5: Open and Inclusive Contracting Standards. [Liberia Public Procurement and Concessions Commission (PPCC)]

Context and Objectives:

Corruption in public procurement has been a long-standing issue resulting in significant loss of government revenue. This commitment outlines four objectives: adopting the open contracting data standard, raising awareness on government procurement processes, engaging civil society and the private sector to improve public procurement, and facilitating participation of more women-owned businesses in public contracts. Online publication of all procurement in a timely and accessible manner would be a game changer not only in addressing corruption but in establishing conversations on gender parity in public procurement. This commitment was carried forward from the previous action plan, as it was not started due to the change in government administration, including leadership changes at the PPCC.⁴¹

Implementers adopted some recommendations provided in the Action Plan Review, such as the creation of influential allies to implement the open contracting reforms. PPCC worked closely with The World Bank, Africa Development Bank, United Nations Development Program (UNDP), and NIF, whose members are government agencies and CSOs collaborating to advance open contracting reforms.

Did It Open Government? Marginal

At the time of assessment, this commitment had had a marginal impact on open government practices. During the implementation period, the PPCC made progress toward establishing the regulatory and technical scaffolding for a transparent public procurement system. Activities also included training and awareness raising and a survey and roundtables on women's participation in public procurement. Therefore, this commitment has made steps toward government transparency and civic participation in government decision-making. Once the electronic system is operational, this reform has the potential to also advance public accountability. This commitment is considered as having achieved a limited level of completion by the time of assessment, as progress was made under milestones 1 and 5. While important, these steps have not yet resulted in the commitment's overall objective to adhere to open and inclusive contracting standards.

Changes over implementation period

E-procurement system and regulation around this

Progress on this topic touches on milestones 1–4. An interview with Nathan Bengu⁴² from PPCC shared that preliminaries to ensure the e-procurement system is in place are ongoing. These include:

- a) Publishing of an expression of interest for the revision of the Public Procurement Act of Liberia and its accompanying regulations to prepare for the Electronic Procurement System.⁴³ A press release on the PPCC website noted that once finalized, this platform "will have linkages with other online applications, including the Integrated Financial Management Information System (IFMIS), revenue portal of Liberia Revenue Authority (LRA), Liberia Business Registry, and the anticipated e-Government system."⁴⁴ This process is supported by World Bank.
- b) A technical committee made up of PPCC, the judiciary branch, and Liberian Petroleum Refining Company reviewed the law and made recommendations on changes to be considered. A press release⁴⁵ on the PPCC website notes that the team took time to learn from the Nigerian state of Kaduna and Rwanda and from this made certain decisions—for example, the choice of



software-as-a-service for their e-government procurement (e-GP) system. Recommendations include inclusion of the e-procurement portal, catalog, framework agreement, and public-private partnership; setup and oversight of a procurement professional association; suggestions on membership revision; and guidance on how to include women-owned micro-, small, and medium sized enterprises in public contracts.

- c) An e-GP strategy was developed to guide the process of procurement, installation, and deployment of the e-GP application. The strategy provides a needs assessment and outlines the phases for rollout.
- d) PPCC put out a call for proposals on 21 September 2022⁴⁶ for the development of the e-GP. A pre-bid meeting report on 19 October 2022 indicated that 27 bidders had submitted their bids and the committee was responding to clarifications,⁴⁷ and an extension for submission to 11 January 2023 was published on 15 November 2022.⁴⁸
- e) With support from Africa Development Bank and World Bank, PPCC staff attended learning sessions from their peers⁴⁹ and hosted awareness-raising events for staff and recruitment of staff.⁵⁰

Regarding civil society participation in the commitment, Anderson Miamen of CENTAL⁵¹ reported that PPCC has been engaging with suppliers and CSOs and sharing with them the new standards in the systems. Additionally, CENTAL had invited PPCC to speak on a radio program on the reforms in the procurement processes, especially on e-procurement. These actions have laid groundwork for future disclosure of government-held information to citizens, other government agencies, and CSOs.

As PPCC goes through the e-GP setup process, it is continuing with its usual disclosure practices. A review of its official website shows that PPCC publishes some information on public contracts awarded. There is a matrix⁵² with analysis/information on all contracts awarded in fiscal year 2021–22. Information shared in the matrix includes contract code, contract type, package description, procurement estimated contract value, actual contract value, awarding entity, business legal owner, business beneficial owner, contract start date, and contract end date. The PPCC has also approved procurement plans and the complaints on procurement. Even with this effort, the information is incomplete and not up to date, and it does not meet standards set by the Open Contracting Data Standards.⁵³ This must be resolved to advance transparency with the current systems.

Civic education on procurement and contracting process

Under milestone 5, Nathan Bengu⁵⁴ and a review of the PPCC website, indicates that the following key activities were undertaken over the 2020–2022 NAP:

- a) A total of 23 staff were brought on board to spearhead awareness-raising sessions on the e-GP and on public procurement.⁵⁵
- b) Between 5 and 8 April 2022, PPCC ran a public procurement compliance workshop in Nimba County for county authorities: county superintendents and their deputies; heads of countybased institutions (health and education sectors); chairs of project management committees; and county procurement officers/technicians from Nimba, RiverCess, Grand Gedeh, Lofa, Bomi, and Grand Bassa counties.⁵⁶
- c) In 2021, PPCC hosted a series of awareness campaigns targeting students in secondary schools, colleges, and universities, and intellectuals from Montserrado, Bong, Grand Bassa, Bomi, Margibi, and Nimba counties.⁵⁷

d) In collaboration with the OGP Secretariat, PPCC hosted a workshop on 3 November 2020 with the journalists and CSO actors to share "knowledge and experiences on the implementation of the Public Procurement reform program and its accompanying pieces of legislations."⁵⁸

Progress witnessed was a result of a funding partnership with Africa Development Bank and UNDP. This shows that PPCC is taking steps to raise awareness on public procurement, while envisioning and bringing on board additional actors to the process. Continuation of these activities will advance civic engagement.

Involvement of women-owned business in public procurement

A review of the PPCC website showed that there was some progress in advancing gender equality in public procurement, which will positively contribute to women's civic participation in public procurement. Greater inclusion of women in public procurement is one of the stated objectives of this commitment. Although specific milestones toward this aim were not specified, completed activities contributing to this objective during the implementation period include:

- a) PPCC conducted a nationwide survey on gender-responsive procurement in 2021 and 2022. This process kicked off with roundtable discussions with stakeholders from ministries, agencies, and autonomous commissions on different gender-sensitive strategies and policies in public procurement and concessions. The discussions informed the data collection process in nine counties: Bomi, Gbarpolu, Grand Cape Mount, Nimba, Grand Bassa, Lofa, Bong, Maryland, Grand Gedeh, and Sinoe counties. The data collectors interacted with procurement entities, business owners, and citizens.⁵⁹ This survey report was not available online.
- b) The head of UN Women Liberia visited PPCC and restated the organization's commitment to supporting gender-responsive procurement in the country. From this meeting it was reported that PPCC is developing a policy framework that will outline women's roles in public procurement.⁶⁰
- c) A gender technical team within PPCC is focusing on improving engagement of women-owned business in public procurement.⁶¹ Information on this committee or any reports connected to its work was not available online.

Establishment of an open contracting forum

Nathan Bengu⁶² reported that the open contracting forum has not been established. However, he said that by law PPCC is required to host an annual procurement forum. The 2021 Annual Procurement Forum was held on 1–3 December 2021. This meeting was supported by World Bank. Attendance included representation from World Bank, the International Monetary Fund, the African Development Bank (AfDB), and CSOs. The theme of the forum was Innovation and Reforms: Strengthening Liberia's Public Procurement System.⁶³

Bengu also shared, as did other members of CSOs, that PPCC is an active member of the NIF. The Director at PPCC chairs the NIF,⁶⁴ which constantly pushes for implementation of the OGP Action Plan 2020–2022. PPCC shares information on public procurement with NIF members as part of its contribution to improving transparency, civic participation, and accountability.

Looking Ahead:

Nathan Bengu⁶⁵ recognized all action to date "as the journey to open contracting." As such, he noted that once finalized, the e-GP would address milestones 3 and 4. Reflecting on implementation together and reviewing literature, the following are recommendations:

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- Progress on the milestones so far was only possible with financial support from development partners. This seemed to complement PPCC commitment in seeing the rollout of the e-GP. Bengu noted that there was a slow start in 2020, as there was not requisite budgetary support to kick off activities in-country or to engage with other countries around peer learning. So far, PPCC has funding from UNDP, World Bank, and AfDB to push on the e-GP; raise awareness on public procurement; and, with support from UN Women, do more on gender-responsive budgeting. He stated that the OGP commitments should not be seen as separate actions but should be integrated into the core programs of implementing agencies.
- With this in mind, commitments and milestones should be deliberately crafted and guided by different PPCC strategies. If crafted well, the commitments and milestones will have a greater potential to deliver substantial results. The platform alone is not adequate unless it is updated with timely and adequate contract information. Establishment of the open contracting forum, as envisaged in the action plan, will not only fast-track delivery of an open contracting system but remain a useful platform for constant conversation on the effectiveness of the platform in delivering on its open government objective.
- Bengu noted there was an opportunity to broaden awareness and engagement sessions beyond Monrovia. This would ensure that local CSOs and business and county officials are on board as the e-GP is being rolled out.
- He shared that the team desires to make sure that the platform developed by the consultant builds in adaptability of the Liberia context.

¹⁷ Ime, interview, 31 October 2022.

 ¹⁹ Favour Ime, "Building Technical Capacity of Stakeholders for Beneficial Ownership Transparency: Lessons from Ghana, Liberia, Nigeria, and Zambia," Open Ownership, 27 October 2022, <u>https://www.openownership.org/en/blog/building-technical-capacity-of-stakeholders-for-beneficial-ownership-transparency-lessons-from-ghana-liberia-nigeria-and-zambia/</u>.
 ²⁰ "Liberia Edges Towards Corporate Transparency," AllAfrica.

²¹ Draft Beneficial Ownership Disclosure Regulations as of November 2022.

²² Draft Beneficial Owner(s) Declaration Form – Natural Persons. Liberia Business Registry, November 2022.

https://drive.google.com/drive/folders/1Jb3SQj_77Mjf6QwCGPoUNh11sBgy1bmy

https://www.openownership.org/en/publications/beneficial-ownership-transparency-in-liberia/

²⁴ Ime, interview, 31 October 2022.

²⁶ "Principles for Effective Beneficial Ownership Disclosure - Updated January 2023," Open Ownership,

<u>https://www.openownership.org/en/principles/</u>. These principles cover robust definition of a beneficial owner; comprehensive coverage; central register; sufficient detail; central register; public access; verification; up to date and auditable; and sanctions and enforcement.

¹² "Country Detail: Liberia," Tax Justice Network, <u>https://fsi.taxjustice.net/country-detail/#country=LR&period=22</u>.

¹³ "Country Profiles: Liberia," Tax Justice Network, <u>https://taxjustice.net/country-profiles/liberia/</u>.

¹⁴ "Liberia Edges Towards Corporate Transparency As LEITI, LBR Set to Launch Beneficial Ownership Registry," AllAfrica, <u>https://allafrica.com/stories/202211150313.html</u>.

¹⁵ Favour Ime, *Beneficial Ownership Transparency in Liberia: The current regime and next steps* (Opening Extractives), <u>https://eiti.org/sites/default/files/2022-11/Liberia%20Scoping%20Report%202022.pdf</u>.

¹⁶ Favour Ime (regional manager, Africa and Middle East, Open Ownership), interview by the IRM, 31 October 2022.

¹⁸ Samson Dee (director general, Liberia Business Registry), interview by the IRM, 2 November 2022.

https://drive.google.com/drive/folders/1Jb3SQj_77Mjf6QwCGPoUNh11sBgy1bmy

²³ Favour Ime. Open Ownership & LEITI (2022), "Beneficial ownership transparency in Liberia."

²⁵ Dee, interview, 2 November 2022.

²⁷ Draft Beneficial Ownership Disclosure Regulations as of November 2022.

https://drive.google.com/drive/folders/1Jb3SQj_77Mjf6QwCGPoUNh11sBgy1bmy

²⁸ "Liberia Edges Towards Corporate Transparency," AllAfrica.

²⁹ Ime, interview, 31 October 2022.

³⁰ Ime, interview, 31 October 2022.

³¹ Ime, interview, 31 October 2022.

³⁴ Dee, interview, 2 November 2022; Ime, interview, 31 October 2022.

³⁵ Dee, interview, 2 November 2022; Ime, interview, 31 October 2022.

³⁸ Dee, interview, 2 November 2022.

³⁹ Dee, interview, 2 November 2022.

⁴⁰ Ime, interview, 31 October 2022.

⁴¹ "Liberia Implementation Report 2017-2019," Open Government Partnership,

https://www.opengovpartnership.org/documents/liberia-implementation-report-2017-2019/.

⁴² Bengu, interview, 24 October 2022.

⁴³ Republic of Liberia Public Procurement and Concessions Commission, *Request for Expressions of Interest–Firm Selection: Public Financial Management Reforms for Institutional Strengthening (PFMRIS) Project*, 9 July 2020, <u>https://www.ppcc.gov.lr/doc/REOI--REVSION%200F%20PFCA.pdf</u>.

⁴⁴ Public Procurement & Concessions Commission, "PPCC Deepens Grips on Public Procurement Digitization Efforts," news release, <u>https://www.ppcc.gov.lr/2press.php?news_id=133&related=7&pg=sp</u>.

⁴⁵ PPCC, "PPCC Deepens Grips on Public Procurement Digitization Efforts."

⁴⁶ Request for Bid Extension For E-GP SAAS System (Liberia: PPCC),

https://www.ppcc.gov.lr/doc/Request%20for%20Bid%20SAAS-Extended%20to%20January%2011,%202023.pdf.

⁴⁷ *Minutes of Prebid Meeting and Response to Clarification Request Submitted by Bidders* (Liberia: PPCC), 19 October 2022, <u>https://www.ppcc.gov.lr/doc/Final%20Response%20for%20Clarification.pdf</u>.

⁴⁸ Republic of Liberia, "Supply, Installation, Configuration, Deployment and Maintenance of an Electronic Government Procurement (e-GP) System for the Government of Liberia on Software as a Service (SAAS) Model," contract document, 15 November 2022, <u>https://www.ppcc.gov.lr/doc/Addendum%201.pdf</u>.

⁴⁹ Study tours to Rwanda. Botswana, and Georgia; PPCC, "PPCC Deepens Grips on Public Procurement Digitization Efforts." ⁵⁰ Three separate teams of PPCC staff were sent to Ghana and United Arab Emirates to undertake training in preparation for e-procurement digitization efforts. In Ghana, the PPCC staff received training in contract management from the Ghana Institute of Management and Public Administration. Several other staff of PPCC, including the chief executive officer, Atty. Jargbe Roseline Nagbe Kowo, participated in high-level training on policy and governance, and on e-procurement. A total of 23 staff were hired and deployed, and they will remain with PPCC for the next three months. Their focus will be to educate various stakeholders and the general public on the procurement, installation, and deployment of the Electronic Government Procurement (e-GP) system; PPCC, *E-GP Awareness Staff Deployed to Engage Stakeholders*, news release,

https://www.ppcc.gov.lr/2press.php?news_id=137&related=7&pg=sp.

⁵¹ Anderson Miamen (executive director, Center for Transparency and Accountability in Liberia [CENTAL]), interview by the IRM, 13 October 2022.

⁵² PPCC, 2020/2021 Contract Award Report (Liberia: PPCC), <u>https://www.ppcc.gov.lr/doc/2020%20-</u>

2021%20Contract%20Award%20Report_%20UPDATED%20July%2015%20-%202022.pdf.

⁵³ Open Contracting Data Standard, home page, <u>http://standard.open-contracting.org/</u>.

⁵⁴ Bengu, interview, 24 October 2022.

⁵⁵ PPCC, E-GP Awareness Staff Deployed to Engage Stakeholders.

⁵⁶ PPCC, "PPCC Moves to Strengthen Capacity of Local Officials in Public Procurement," news release,

https://www.ppcc.gov.lr/2press.php?news_id=129&related=7&pg=sp.

⁵⁷ PPCC, "PPCC Takes Public Procurement Outreach to Universities & Intellectual Centers," news release, <u>https://www.ppcc.gov.lr/2press.php?news_id=126&related=7&pg=sp</u>.

⁵⁸ PPCC, "PPCC Engages Media/Civil Society Groups to Strengthen Collaboration," news release,

https://www.ppcc.gov.lr/2press.php?news_id=117&related=7&pg=sp.

⁵⁹ PPCC, "PPCC Conducts Nationwide Survey on Gender Responsive Procurement," news release,

https://www.ppcc.gov.lr/2press.php?news_id=125&related=7&pg=sp.

⁶⁰ PPCC, "UN Women Boss Pays a Courtesy Visit to PPCC," news release,

https://www.ppcc.gov.lr/2press.php?news_id=136&related=7&pg=sp.

⁶¹ PPCC, "UN Women Boss Pays a Courtesy Visit to PPCC."

⁶² Bengu, interview, 24 October 2022.

⁶³ PPCC, "PPCC Holds Third National Annual Procurement Forum," news release,

https://www.ppcc.gov.lr/2press.php?news_id=128&related=7&pg=sp.

⁶⁴ A structure for collaboration between CSOs and government that meets regularly to discuss ways and mechanisms of improving integrity, transparency, and accountability in the governance space.
⁶⁵ Beager integrity, 24 October 2022

⁶⁵ Bengu, interview, 24 October 2022.

³² Ime, Beneficial Ownership Transparency in Liberia.

³³ Dee, interview, 2 November 2022.

³⁶ Ime, Beneficial Ownership Transparency in Liberia.

³⁷ Ime, interview, 31 October 2022.

Section III. Participation and Co-Creation

Co-creation of Liberia's fourth action plan marked a more inclusive process than in previous cycles. However, civil society and government engagement dropped off during the implementation period. The Liberian Open Government Partnership (OGP) Secretariat is encouraged to continue broadening and deepening participation in the OGP process, particularly among civil society beyond Monrovia.

OGP Secretariat: Liberia has an established an OGP Secretariat with five staff members: the point of contact, Ralph G. Jimmeh Jr.; an office assistant; a program officer; a finance officer; and a cleaner. Jimmeh noted that the team had inadequate resources throughout the action plan and the current staff numbers were insufficient to monitor fulfillment of commitments. The Secretariat conducted a final self-assessment as opposed to the biannual meetings as outlined in Commitment 11. The Secretariat received some support from World Bank, Open Society Initiative for West Africa (OSIWA), and the Government of Liberia. The Government of Liberia supported a survey to track implementation of the COVID-19 response on citizens.⁶⁶ The two development partners supported roundtable discussions with media and citizen engagements in targeted districts.⁶⁷ However, Jimmeh noted that the Secretariat needs greater financial support to carry out its mandate.

OGP Multi-Stakeholder Forum: The Multi-Stakeholder Forum (MSF) was set up in 2018.⁶⁸ It is a broad group with hundreds of members and representation from government and CSOs. The OGP point of contact⁶⁹ reported that the MSF participated in co-creation and meets quarterly to discuss the NAP progress and challenges being faced and to offer solutions.

OGP Steering Committee: Liberia has a 10-member Steering Committee, with equal representation from government and civil society. Members are selected from the MSF and support the Secretariat's work.⁷⁰ The committee meets monthly and has remained active even during the COVID-19 pandemic. The Steering Committee carries out decisions made by the broader MSF, monitors the Secretariat's work, and facilitates government and civil society Steering Committee members reflect collaboration to advance the action plan. individuals/organizations responsible for implementing a commitment, and membership is therefore updated accordingly with each action plan. Members either volunteer to participate or are selected by the MSF. There are two standing members: the Ministry of Finance and Development Planning, since it must appropriate budgets, and the Ministry of Information, Cultural Affairs, and Tourism, as it is the technical host of OGP. The information above is based on interviews with Jimmeh,⁷¹ as IRM has received no documentation on the MSF, Steering Committee composition, activities, or meeting notes.

Engagement, Dialogue and Decision-Making

The action plan was developed in a consultative process involving government officials, civil society, media, and citizens. This was reconfirmed by all government and CSO representatives interviewed, a literature review, and a review of the OGP Liberia Facebook page.⁷² According to the OGP Facebook page, various consultations were held to develop the action plan. The draft plan was discussed by 18 citizens from eight counties: Lofa, Grand Gedeh, Sinoe, Maryland, RiverGee, Bong, Grand Kru, and Nimba.⁷³ Local government officials—including superintendents,



IRM Results Report: Liberia 2020-2022 For Public Comment: Please Do Not Cite or Circulate

development superintendents, and county inspectors—from Grand Bassa, Margibi, and Rivercess were sensitized on the role of local government in contributing to opening government; they also discussed the draft action plan.⁷⁴ A MSF meeting hosted members from Margibi, Bomi, Grand Cape Mount, Gbapolu, Grand Bass, and Montserrado counties to solicit inputs from citizens in the development of the NAP.⁷⁵ These convenings were held with support from the Multi-Donor Trust Fund, World Bank, and OSIWA. These convenings brought a variety of voices to drafting the NAP and contributed to "helping to further level the playing field" by bringing more stakeholders into the co-creation discussions.⁷⁶ There is a need to bring on board a larger group of citizens and local government in the co-creation and implementation process. There is also potentially an opportunity to implement some recommendations proposed by local government, including the setting up of county accountability teams who would support tracking and monitoring corruption and government procurement processes.⁷⁷

Lawrence Yealue from Accountability Lab⁷⁸ noted that the co-creation process brought more stakeholders (both government and civil society organizations [CSOs]) on board as compared to the third action plan. Jimmeh shared this sentiment.⁷⁹ He felt that this involvement contributed to improved commitment ownership by lead implementing agencies, and this had a positive impact on implementation despite resource constraints, saying, "Even in the face of resource constraints, they still had the desire to fulfill the commitment." The improved co-creation process saw the inclusion of four new commitments and assignment of principal actors for each commitment. Yealue⁸⁰ reported that the appointment of a CSO representative to be co-chair of the Steering Committee also contributed to increasing CSOs' engagement in implementation.

With the COVID-19 pandemic, the MSF and Steering Committee moved meetings online. To ensure consistent engagement, commitment-specific WhatsApp groups were formed. In this space, updates on implementation, meeting agendas, and notes were shared. The Secretariat updated its Facebook page⁸¹ and Twitter handle⁸² to update the public regarding implementation of the action plan. It also engaged different media (print and electronic) in roundtable engagements to raise awareness on OGP principles and activities; sensitized the media on its role in promoting accountability, transparency, and openness; and spoke to the challenges facing OGP in Liberia, among other topics.⁸³

Strong partnerships between implementing agencies and technical and financial partners facilitated implementation—for example, partnerships between LBR and Open Ownership⁸⁴ and the Liberia Public Procurement and Concessions Commission (PPCC) with World Bank.⁸⁵ These partnerships resulted in government agencies receiving funding and technical support implementing the milestones. Agencies like the LBR also benefited peer exchange with countries like Ghana, Nigeria, and Zambia. Additionally, the National Integrity Forum, supported by the Swedish International Development Cooperation Agency through the Center for Transparency and Accountability in Liberia (CENTAL), continues to bring together government agencies and CSOs to design and implement actions that promote transparency, accountability, and integrity all over Liberia.

Challenges and Weaknesses Throughout the Action Plan Cycle

Lawrence Yealue from Accountability Lab and Ralph G. Jimmeh Jr., the OGP point of contact, noted that decision makers' interest declined during implementation. In some critical meetings, "Decision makers sent their proxies to meetings who sometimes also sent their proxies. There were instances where some people in the meetings had to go out to consult their seniors on the



position of the institution before a vote is passed. In some cases decisions were sometimes deferred because the representatives had to consult with their seniors." Both interviewees noted that there is need for government and CSO decision makers to demonstrate their commitment by engaging in meetings.

While there was increased engagement of CSOs in the development and implementation of the action plan, more still needs to be done to include diverse groups in the development and implementation process. Anderson Miamen from CENTAL recommended better inclusion of CSOs outside Monrovia. He noted that there was an untapped opportunity: "CSOs have not done enough to take full ownership of the document. We should have held robust discussions of the action plan in our spaces, CSOs including various forums. We have not done our independent assessment of the action plan." He noted that by taking commitments seriously, CSOs could play their role in not only contributing to implementation but holding the government accountable in meeting its commitments.

Funding remained a key challenge in the implementation of the action plan. Jimmeh shared that all commitments selected had a budgetary allocation at the point of co-creation. However, this changed during implementation. A government official noted, "Most of the milestones that were set were not fully achieved because of budget challenges. There [was] no budget allocated to specific milestones." Some milestones experienced some progress once development partners addressed funding shortfalls.

Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP's Participation and Co-Creation Standards for the purposes of procedural review.⁸⁶ During cocreation, Liberia acted according to the OGP process.⁸⁷ The two minimum requirements listed below must achieve at least the level of "in progress" for a country to have acted according to OGP process.

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

Acted according to OGP process during the implementation period?	
The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan. The OGP Liberia website and Facebook page include some information such as the latest action plan and OGP Secretariat activities. However, neither contains specific evidence of commitment implementation. ⁸⁸	Yellow
The government provided the public with information on the action plan during the implementation period. The OGP Secretariat provided	Green



updates to the Steering Committee and MSF through WhatsApp and Facebook.⁸⁹

https://www.facebook.com/permalink.php?story_fbid=pfbid0qqWGk5Nah4oDg6dWMaGaPZDgxWhfXFQqSTwyxij5Le9PBBN4L AyrhKMmthsguDFhl&id=2214242955516286.

https://www.facebook.com/permalink.php?story_fbid=pfbid029t4kj1MjRCPcE3tdRTmzubMpKuvPv3Jm42gxW1SvacJqEmtzW25 3axjyvoVFDHwPl&id=2214242955516286.

⁷⁶ Open Government Partnership Secretariat, Facebook post, 21 January 2020,

https://www.facebook.com/permalink.php?story_fbid=pfbid02C88mePFK775AU24VYwgoFfW9bSN7LkLktDEeBHJnnVqLijUJXLtn WhUUmUXkhvLvl&id=2214242955516286.

⁷⁷ Open Government Partnership Secretariat, Facebook post, 10 September 2020.

⁷⁸ Lawrence Yealue (country director, Accountability Lab, and co-chair of the OGP Secretariat), interview by the IRM, 11 October 2022.

- ⁸¹ Open Government Partnership Secretariat, Facebook profile.
- ⁸²Open Government Partnership Liberia (@OGP_Liberia), Twitter profile, <u>https://twitter.com/ogp_liberia</u>.

⁸³ Open Government Partnership Secretariat, Facebook post, 28 August 2020,

https://www.facebook.com/permalink.php?story_fbid=pfbid02gY7fbsqY3PhP4sPZbRcu1Vp7ahjJmmnE5V8bT61XGcQKF4YsjsGK pS1y6LFjxPsDl&id=2214242955516286; Open Government Partnership Secretariat, Facebook post, 21 August 2020, https://www.facebook.com/permalink.php?story_fbid=pfbid02effpUdPLAvpuyRuo7Ge2DfXu81weApsTCW2idXFS4sn5U1Xw1e UXKbBC9ydg73wGl&id=2214242955516286; Open Government Partnership Secretariat, Facebook post, 3 November 2020, https://www.facebook.com/permalink.php?story_fbid=pfbid0gmfAYEKkbTQmmUErbkiw7E5HvrxiySP9MZg9tmnhfaCFMNiJqdH EjzZytVLHQMbbl&id=2214242955516286; Open Government Partnership Secretariat, Facebook post, 7 June 2022, https://www.facebook.com/watch/live/?ref=watch_permalink&v=528972175551700 and

https://www.facebook.com/watch/live/?ref=watch_permalink&v=1096161104446076.

⁸⁴ Ime, interview, 31 October 2022.

⁸⁵ Bengu, interview, 24 October 2022.

⁸⁶ Please note that future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022: "OGP Participation and Co-Creation Standards," Open Government Partnership.

⁸⁷ Open Government Partnership Secretariat, Facebook profile.

⁸⁸ Open Government Partnership Liberia, home page, <u>https://www.ogpliberia.org/</u>; Open Government Partnership Secretariat, Facebook profile.

⁸⁹ The IRM researcher received confirmation from Anderson Miamen from Center for Transparency and Accountability in Liberia (CENTAL), Lawrence Yealue (Accountability Lab). and Ralph G. Jimmeh Jr. (OGP Secretariat) that the Multi-Stakeholder Forum and the Secretariat are updated regularly via WhatsApp and on the Facebook page.

⁶⁶ Open Government Partnership Secretariat, Facebook post, 10 June 2020,

https://www.facebook.com/permalink.php?story_fbid=pfbid02rXuruqj2kzuxhjxs6c3RcJ9BqKpM3kmzq3pih24tN26LNE4265m3G XohKrt51ZsSl&id=2214242955516286.

⁶⁷ Open Government Partnership Secretariat, Facebook profile, <u>https://www.facebook.com/people/Open-Government-</u> Partnership-Secretariat/100064679890322/.

⁶⁸ "Liberia Action Plan Review 2020-2022," Open Government Partnership.

⁶⁹ Jimmeh, interviews, 19 October 2022 and 1 November 2022.

⁷⁰ Jimmeh, interviews, 19 October 2022 and 1 November 2022.

⁷¹ Jimmeh, interviews, 19 October 2022 and 1 November 2022.

⁷² Open Government Partnership Secretariat, Facebook profile.

⁷³ Open Government Partnership Secretariat, Facebook post, 10 September 2020,

⁷⁴ Open Government Partnership Secretariat, Facebook post, 10 September 2020.

⁷⁵ Open Government Partnership Secretariat, Facebook post, 24 September 2020,

⁷⁹ Jimmeh, interview, 19 October 2022.

⁸⁰ Yealue, interview, 11 October 2022.

Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle.⁹⁰ The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.⁹¹

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.⁹² The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.⁹³ The level of completion for all commitments is assessed as one of the following:

- No evidence available
- Not started
- Limited
- Substantial
- Complete

Did It Open Government?

The IRM assesses changes to government practices that are relevant to OGP values, as defined in the OGP Articles of Governance, under the "Did it open government?" indicator.⁹⁴ To assess evidence of early results, the IRM refers to commitments or clusters identified as promising in the Action Plan Review as a starting point. The IRM also considers commitments or clusters with a high level of completion that may not have been determined as "promising" but that, as implemented, yielded significant results. For commitments that are clustered, the assessment of "Did it open government?" is conducted at the cluster level, rather than the individual commitment level. Commitments or clusters without sufficient evidence of early results at the time of assessment are designated as "no early results to report yet." For commitments or clusters with evidence of early results, the IRM assesses "Did it open government?" as one of the following:

- *Marginal:* Some change, but minor in terms of its effect on level of openness
- *Major:* A step forward for government openness in the relevant policy area but remains limited in scope or scale
- *Outstanding:* A reform that has transformed "business as usual" in the relevant policy area by opening government

This report was prepared by the IRM in collaboration with Josephine Njungi with support from Evans Kibet and was reviewed by Brendan Halloran, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP). The current IEP membership includes:

• Snjezana Bokulic

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- Cesar Cruz-Rubio
- Mary Francoli
- Maha Jweied
- Rocio Moreno Lopez

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual⁹⁵ and in Liberia's Action Plan Review 2020–2022. For more information, refer to the "IRM Overview" section of the OGP website, available here. A glossary on IRM and OGP terms is available on the OGP website.⁹⁶

https://www.opengovpartnership.org/creating-ogps-future-together/.

⁹⁰ For definitions of OGP terms, such as co-creation and promising commitments, see "Glossary," Open Government Partnership, <u>https://www.opengovpartnership.org/glossary/</u>.

⁹¹ Note: Liberia's OGP website does not currently meet the requirements for an OGP repository: Open Government Partnership Liberia, home page.

⁹² See "Creating OGP's Future Together: Strategic Planning 2023–2028," Open Government Partnership,

⁹³ The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "potential for results" and "Did it open government?" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

⁹⁴ See OGP, *Open Government Partnership Articles of Governance*, 17 June 2019, <u>https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP_Articles-of-Governance_2019.pdf</u>.

⁹⁵ Independent Reporting Mechanism, IRM Procedures Manual, V.3, 16 September 2017,

https://www.opengovpartnership.org/documents/irm-procedures-manual.

⁹⁶ "Glossary," Open Government Partnership.

Annex I. Commitment Data⁹⁷

Commitment 1: BENEFICIAL OWNERSHIP

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial
- **Completion:** Limited
- Did it open government? Marginal

The commitment is assessed in Section II above.

Commitment 2: BUDGET TRANSPARENCY

- Verifiable: Yes
- Does it have an open government lens? Yes
- **Completion:** Limited
- Did it open government? Marginal

• **Potential for results:** Modest

This commitment aimed to open the budget process by making relevant budget documents available online and to improve citizens participation to increase public understanding of government resource allocation and management.

The availability of Liberia's key budget documents improved slightly during the implementation period, as foreseen under milestone 1. The Executive Budget Proposal, Citizens Budget, quarterly data, budget timetable and circulars, and audit reports were published from 2020 to 2022. The Pre-Budget Statement and In-Year reports were not published as of November 2022. The Mid- and End-Year reports were not yet published, as it was not the end of the fiscal year.⁹⁸ Liberia's score in the Open Budget Index increased slightly from 38 to 45 points out of a total of 100 points from 2019 to 2021. Liberia's public participation score remained the same at 6 out of 100 points from 2019 to 2021.⁹⁹

In August 2022, the government announced plans to produce 10,000 copies of the Citizens Budget, hold 15 town hall meetings, and appear on 15 live-radio phone-in talk shows to discuss the national budget (milestone 2.2).¹⁰⁰ The Independent Reporting Mechanism (IRM) did not receive evidence to verify these activities. Beyond the commitment milestones, the Ministry of Finance and Development Planning (MFDP) established a Fiscal Transparency Advisory Group with equal representation of government and civil society. The group advises MFDP on fiscal transparency and participation practices. For instance, the group presented the government with a 2023 shadow budget that reflected public input collected across town halls piloted at the county level.¹⁰¹ The Acting Minister of the MFDP reported that the government is considering six of the twenty expenditure priorities suggested by the public, such as additional funding for healthcare and eliminating school enrollment fees.¹⁰² The IRM did not find evidence on the development of a portal to increase public access to fiscal data (milestone 2.1).

The Government of Liberia's piloting of public budget consultations and consideration of public input is an important step toward fiscal openness. If the government expands consultations beyond the pilot and incorporates public feedback into the final budget, this reform could



culminate in greater open government gains in the longer term.

Commitment 3: ACCESS TO JUSTICE

- Verifiable: Yes
- Does it have an open government lens? Yes
- **Completion:** Not started
- Did it open government? No early results to report yet
- Potential for results: Modest

This commitment focused on building capacity within the justice system and engaging citizens on justice issues at the local level. The five milestones foreseen in this commitment were not carried out due to financial constraints.

The Judiciary did not open jury management offices in three counties (Bong, Bassa, and Riverscess) as planned.¹⁰³ A review of the Liberia Judiciary website¹⁰⁴ shows that jury management offices were established in eight of the sixteen judicial circuits. However, as dates are not provided, it is not possible to establish when these management offices were set up and if the three are in the counties mentioned above. Annual regional awareness campaigns on jury services and the establishment of a database to track and follow up on bonds were also not carried out.¹⁰⁵

OGP Point of Contact Ralph G. Jimmeh and the action plan Self-Assessment Report stated that the lack of resources prevented the intended training and assigning of 120 public professionals with magistrate courts in all 15 counties and training of 60 magistrates in the remaining counties.¹⁰⁶ *The Liberian Judiciary* magazine¹⁰⁷ reports that between 2010 and 2020, the Judiciary Institute, in collaboration with International Development Partners, recruited and trained 240 college graduates who serve as associate magistrates within the Judiciary. It speaks to additional training programs for judges, magistrates, public defenders, prosecutors, clerks, and ministerial officers. However, from this report, it is not clear that these figures can be attributed to the milestones.

Commitment 4: SUPPORTING INSTITUTIONS OF INTEGRITY

• Verifiable: Yes

- **Completion:** Limited
- Does it have an open government lens? Yes
- Did it open government? Marginal
- Potential for results: Substantial

The aims of this commitment were to support the passage of laws to bolster integrity and accountability of public servants, support the development of an anti-corruption court, develop a national integrity committee, and integrate integrity and accountability education into the public school system.

This commitment has a limited level of completion in consideration of progress across the four milestones. Interviews with key Liberia civil society organization (CSO) contacts¹⁰⁸ and the Open Government Partnership (OGP) point of contact¹⁰⁹ indicate that the Liberian Anti-Corruption Commission (LACC) has been going through leadership challenges with the passing of



amendments on the Liberian Anti-Corruption Commission Act. CSOs have reacted to these amendments and released a joint statement.¹¹⁰ These key informants reported that this was an obstacle to progress on this commitment.

The Whistleblower and Witness Protection Bill is available online¹¹¹ but has not been passed into law. A fast-track specialized anti-corruption court was not established by the time of the assessment.¹¹² LACC has not established a National Integrity Committee to monitor high-risk institutions.¹¹³ However, LACC, in partnership with several CSOs and government institutions, are members of the National Integrity Forum, which meets regularly and speaks out on transparency, accountability, and integrity.

There is some evidence of implementation of the milestone to integrate integrity, transparency and accountability education into the Liberian public school curriculum. The draft Liberia NAP Self-Assessment Report indicates that while there were conversations around this, there were no revisions by the time of the assessment.¹¹⁴ However, LACC, Accountability Lab, and the Center for Transparency and Accountability in Liberia (CENTAL) have been part of supporting integrity clubs in schools. Under the 3.5-year National Integrity Building and Anti-Corruption Programme, CENTAL, with support from the Swedish International Development Cooperation Agency, has set up integrity clubs¹¹⁵ in the University of Liberia, United Methodist University, Africa Methodist Episcopal University, and Stella Maris Polytechnic University. In these universities, about 135 students are members. They have been trained on integrity and worked as data entry clerks.¹¹⁶ They reached out to 19 public and private high schools, interacting with 1,850 students, including people with disabilities, in Monrovia and its environs.¹¹⁷ This has contributed to raising awareness on transparency, accountability, and integrity. The IRM researcher did not receive a response from the commitment implementers despite several attempts.

Commitment 5: OPEN AND INCLUSIVE CONTRACTING STANDARDS

Verifiable: Yes •

•

- **Completion:** Limited •
- Does it have an open government lens? Yes
- Did it open government? Marginal
- Potential for results: Substantial •

This commitment is assessed in Section II above.

Commitment 6: IMPROVED AND OPEN HEALTHCARE DELIVERY

- Verifiable: Yes
- Does it have an open government • lens? Yes
- This commitment has been clustered as: • **Open Healthcare Delivery (Commitments** 6 and 12 of the action plan)
- Potential for results: Substantial

- **Completion:** Limited
- Did it open government? Marginal



This commitment focused on improving healthcare service delivery through training and use of technology; opening data on medical supply chain management and aid, including on emergency procurements during disease outbreak; and improving public participation in healthcare management at the national, district, and county levels.¹¹⁸

Analysis of this commitment focused on milestones 3 and 4, which had the strongest connection to open government. The Ministry of Health (MoH) has made initial progress toward milestone 4 to operationalize County Health Boards (CHBs) in eight counties. A focal point for the commitment, Dr. Justine Korvoyan from the MoH, stated that there has been progress in tracking health resources and in setting up functional CHBs in five counties: Margibi, Grand Cape Mount, Grand Bassa, Grand Gedeh, and River Cess. According to MoH documents, the boards aim to include representatives from local government ministries; traditional councils; nongovernment and faith-based organizations; youth, labor, and women leaders; and nonvoting county health officials. The boards' mandate includes decision-making and oversight of healthcare delivery at the county level. In 2020 and 2021, board members received training in their role and functions. The MoH has also developed and shared reporting templates as part of the training.¹¹⁹ As the existing boards have not yet begun to execute their mandate, this commitment is evaluated to have made only marginal progress at the time of assessment. However, this reform could build toward notable open government results should the boards be instituted across counties and become operational.

The IRM researcher did not find evidence that the MoH has implemented milestone 3 to publish quarterly reports on health resources, particularly those related to COVID-19. Korvoyan reported that the MoH has employed supply chain experts and established a system to track flow of medical drugs from the source to the facilities.¹²⁰ He noted that procurement for COVID-19 supplies is ongoing. However, the IRM did not receive evidence on transparency efforts related to health procurement. The IRM researcher did not receive a response to a request for information on the progress on the remaining milestones.

Commitment 7: ENGAGING CITIZENS IN THE LEGISLATIVE PROCESS

• Verifiable: Yes

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- Does it have an open government lens? Yes
- **Completion:** Not started
- Did it open government? No early results to report yet
- **Potential for results:** Modest

This commitment aimed to increase transparency in the legislative process and increase citizen participation in public policy-making.

A literature review indicates that there is not a central database to track status of bills in the House of Representatives and Senate; to access the full text of draft bills and information on the progress, sponsors, and voters for bills; or to view published quarterly reports and evidence of any consultative meetings. A website that listed Liberian Legislative Acts was last updated on 20 February 2017.¹²¹ Websites linked to the legislature are not accessible: They give a message "The site cannot be reached" when accessed.¹²²

However, the Institute for Research and Democratic Development (IREDD) has tracked bills in the House since 2010. This information includes a link to the full text of the bill, the type of bill,



the body of origin, status, sponsor, and date it was introduced. The last entry was on 23 September 2019.¹²³ IREDD's 2021 first biannual legislative monitoring performance scorecard reports that of the 88 and 49 bills in the House of Representatives and Senate respectively, 13 and 7 legislations were passed across the respective houses. This report noted that information from the legislature was not regularly updated or accessible. This undermined legislative transparency, promoting a closed governance system that leads to corruption.^{124,125}

CSOs have also taken on work to organize stakeholder consultations and media-CSO roundtable discussions around certain bills. An example is the Center for Media Studies and Peace Building, which, with support from the Small Media Foundation, facilitated several stakeholder consultations and hosted radio shows as advocacy for the enactment of the Data Protection Legislation in Liberia, a draft bill by the Ministry of Post and Telecommunications.¹²⁶

The IRM researcher could not reach a representative from the Legislature for this commitment. No contact was listed in the action plan and the OGP Secretariat did not provide a point of contact for the commitment upon request.

Commitment 8: OPEN INFORMATION AND PUBLIC ENGAGEMENT TO SUPPORT REVENUE GENERATION

- Verifiable: Yes
- Does it have an open government lens? Yes
- **Completion:** No evidence available
- Did it open government? No early results to report
- Potential for results: Modest

This commitment aimed to adhere to the common reporting standard, raise tax policy and compliance awareness among corporates and the general public, and make the government tax collection and allocation process more transparent.

A review of the Liberia Revenue Authority (LRA) website indicates no evidence of progress on the milestones. The Common Reporting Standards are mentioned once in the LRA 2020–2021 report: "The ITS also intends to work with relevant stakeholders to domesticate the OECD-AEOI common reporting standards for use by financial institutions."¹²⁷ The report does not provide clear actions on how this would be done. A request was made with the Liberia OGP Secretariat to reach out to the LRA. At the time of drafting the report, no contact had been made.

Commitment 9: ACCOUNTABILITY AND TRANSPARENCY IN ADDRESSING SEXUAL AND GENDER-BASED VIOLENCE

 Verifiable: Yes
 Does it have an open government lens? Yes
 Potential for results: Modest
 Completion: Not started
 Did it open government? No evidence available

The IRM researcher did not find evidence online that the milestones to conduct a Post Module Test, map CSOs, or create a platform to track gender-based violence cases across the country had been started. The Ministry of Gender, Children, and Social Protection and the OGP Secretariat did not respond to the IRM researcher's request for further information.



Commitment 10: YOUTH ENGAGEMENT FOR PROTECTION OF CIVIL SPACE

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest
- Completion: Not started
- Did it open government? No early results to report yet

Desk review for this commitment indicated that action has not started on any milestone. This was confirmed at an interview with Ralph G. Jimmeh, OGP point of contact.¹²⁸

Commitment 11: MONITORING AND NEXT STEPS

• Verifiable: Yes

- **Completion:** Limited
- Does it have an open government lens? Yes
- Did it open government? No early results to report yet
- Potential for results: Unclear

The OGP Secretariat in Liberia planned to be intentional in monitoring implementation of the NAP 2020–2022. However, this was not possible, as the Secretariat did not have the requisite funds to do so.¹²⁹ In August 2022, the Secretariat conducted a self-assessment, and a draft report was shared with the IRM.¹³⁰

Commitment 12: MONITORING AND NEXT STEPS

•	Verifiable: Yes Does it have an open government lens? Yes	 Completion: Limited Did it open government? Marginal
•	This commitment has been clustered as: Open Healthcare Delivery (Commitments 6 and 12 of the action plan) Potential for results: Substantial	

Desk review indicates that civil society organization iLab, with information from National Public Health Institute of Liberia and MoH, put out COVID-19 data visualization for the period March–August 2020. Visualization covered COVID-19 rapid-response functional healthcare facilities, cases per county, cases per month, and cases per gender.¹³¹ ILab also prepared an Excel spreadsheet with detailed information on the rapid-response healthcare facilities across all counties.¹³² There was no evidence on how this data is being used by government, CSOs, citizens, or other actors. There is also no evidence of this information being disseminated through emails, newsletters, social media, blog posts, or in-person meetings. There is no evidence that there were printed maps or that the visualized data was converted to various data formats to be reused.

The OGP Facebook page reported that with funding from the Government of Liberia, the OGP Liberia Secretariat conducted a survey to monitor and track the impact on citizens of the government COVID-19 response. Enumerators were trained across five locations in Montserrado. These districts were selected based on Ministry of Health information.¹³³ The report indicates that government officials were unwilling to release information for public



consumption. Most respondents had received government information on COVID-19 through diverse platforms. However, more funding for this was required, and the report recommended that committees set up by government during emergencies should work with statutory public institutions in execution of their mandate.¹³⁴

⁹⁷Editorial notes:

- 1. For commitments that are clustered: The assessment of potential for results and "Did it open government?" is conducted at the cluster level, rather than the individual commitment level.
- 2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see the Liberia action plan: <u>https://www.opengovpartnership.org/wp-content/uploads/2021/01/Liberia_Action-Plan_2020-2022.pdf</u>.
- 3. For more information on the assessment of the commitments' design, see Liberia's Action Plan Review: https://www.opengovpartnership.org/wp-content/uploads/2021/06/Liberia_Action-Plan-Review_2020-2022.pdf.

⁹⁸ "Availability of budget documents_Liberia.docx." Available at: https://drive.google.com/drive/folders/1Jb3SQj 77Mjf6QwCGPoUNh11sBgy1bmy

⁹⁹ "Country Results: Liberia," International Budget Partnership, <u>https://internationalbudget.org/open-budget-survey/country-</u> results/2021/liberia.

¹⁰⁰ "Liberia Makes Improvement in Fiscal Transparency Index Score," The New Dawn, AllAfrica, 10 August 2022,

https://allafrica.com/stories/202208100168.html.

¹⁰¹ "Liberia: Citizens Want Gov't Improve on Basic Social Services," Daily Observer, 26 August 2022,

https://www.liberianobserver.com/liberia-citizens-want-govt-improve-basic-social-services; J.H. Webster Clayeh, "Liberia: GoL Receives 2023 'Shadow Budget' from National Fiscal Transparency Advocacy Group," Front Page Africa, 13 October 2022,

https://frontpageafricaonline.com/news/liberia-gol-receives-2023-shadow-budget-from-national-fiscal-transparency-advocacy-group/.

¹⁰² Gerald C. Koinyeneh, "Liberia: Finance Minister Submits US\$ US\$777.94 Million FY2023 Budget to Legislature," Front Page Africa, 6 December 2022, <u>https://frontpageafricaonline.com/news/liberia-finance-minister-submits-us-us777-94-million-fy2023-budget-to-legislature/</u>.

¹⁰³ "The Road to Transformation and the Rule of Law 2011-2022," *The Liberian Judiciary*, September 2022, 26, accessed 12 January 2023, <u>http://judiciary.gov.lr/judiciary-magazine-september-2022/</u>.

¹⁰⁴ "Office of the Jury Management: Profile," The Judiciary, Republic of Liberia, <u>http://judiciary.gov.lr/jury-management/</u>.
 ¹⁰⁵ Jimmeh, interview, 19 October 2022; Draft Liberia NAP Self-Assessment Report 2022. Provided by the Liberian OGP Secretariat to the IRM Researcher.

¹⁰⁶ Jimmeh, interview, 19 October 2022; Draft Liberia NAP Self-Assessment Report 2022. Provided by the Liberian OGP Secretariat to the IRM Researcher.

¹⁰⁷ "Achievements," *The Liberian Judiciary*, September 2022, 21, accessed 12 January 2023, <u>http://judiciary.gov.lr/judiciary-magazine-september-2022/</u>.

¹⁰⁸ Yealue, interview, 11 October 2022.

¹⁰⁹ Jimmeh, interview, 19 October 2022.

¹¹⁰ Yealue, interview, 11 October 2022; Press Statement by Joint Civil Service Organizations on the Restated Liberia Anti-Corruption Commission (LACC) Act," Facebook video,

https://www.facebook.com/watch/live/?ref=watch_permalink&v=721105189190441.

¹¹¹ "Whistle-Blowers & Witness Protection Bill of 2017," Liberia Anti-Corruption Commission (LACC), 2017,

https://lacc.gov.lr/wp-content/uploads/2022/03/Witness-Protection-Bill.pdf.

¹¹² Draft Liberia NAP Self-Assessment Report.

¹¹³ Draft Liberia NAP Self-Assessment Report.

¹¹⁴ Draft Liberia NAP Self-Assessment Report.

¹¹⁵ "What We Do: Youths and Integrity," Center for Transparency and Accountability in Liberia (CENTAL), 25 March 2020, <u>https://cental.org.lr/index.php/what-we-do/youths-14/itemlist/category/6-</u>.

¹¹⁶ "CENTAL Empowers Over 135 Students Through IClub," CENTAL, 27 May 2022, <u>https://www.cental.org.lr/index.php/media-center/news/item/90-cental-empowers-over-135-students-through-iclub</u>.

¹¹⁷ CENTAL, "Integrity Club Intensifies Awareness-Raising in Schools" (Facebook post), 8 July 2022, <u>https://hi-in.facebook.com/tiliberia/posts/8133186226699454/</u>.

¹¹⁸ "Liberia Action Plan Review 2020-2022," Open Government Partnership.

¹¹⁹ Justine Korvoyan (director for governance and decentralization, Planning, Ministry of Health, Government of Liberia), correspondence with the IRM, 17 January 2023. Documents shared include training agenda, presentation, and materials for County Health Boards.

¹²⁰ Justine Korvoyan (director for governance and decentralization, Planning, Ministry of Health), interview by the IRM, 26 October 2022.

¹²¹ "Liberian Legislative Acts (Handbills)," Liberia Legal Information Institute, accessed 5 January 2023, http://www.liberlii.org/lr/legis/acts/.

¹²² "House of Representatives," Legislature of Liberia, accessed 5 January 2023, <u>http://legislature.gov.lr/house</u>.

¹²³ "Bills," Liberian Lawmakers Watch, accessed 14 January 2023, <u>https://liberianlawmakerswatch.org/bills.html</u>.

¹²⁴ "Is the Liberian Legislature Working for the People or for the President?" Institute for Research and Democratic Development, press statement,

https://liberianlawmakerswatch.org/sites/www.liberianlawmakerswatch.org/files/iredd_press_statement_legis_report_final_2_021 for_publication_20.pdf.

¹²⁵ <u>https://liberianlawmakerswatch.org/sites/www.liberianlawmakerswatch.org/files/iredd_bi-</u>

annual legislative monitoring report january-june 2021 final report 2021.pdf (site discontinued).

¹²⁶ Center for Media Studies and Peace Building, Facebook posts on 1 April 2022, 18 March 2022, 8 March 2022, 7 March 2022, and 4 March 2022, <u>https://www.facebook.com/cemespliberia/</u>.

¹²⁷ *Liberia Revenue Authority Annual Report 2020 – 2021* (Liberia Revenue Authority), 68, <u>https://revenue.lra.gov.lr/wp-</u>content/uploads/2022/01/Liberia-Revenue-Authority-LRA-FY2020 2021-Annual-Report-Published-Dec.-31-2021.pdf.

¹²⁸ Jimmeh, interview, 1 November 2022.

¹²⁹ Jimmeh, interviews, 19 October 2022 and 1 November 2022.

¹³⁰ Draft Liberia NAP Self-Assessment Report.

¹³¹ "COVID-19 Data Visualization," iLab Liberia, <u>https://www.ilabliberia.org/data-visualization</u>.

¹³² "iLab Liberia HOT Rapid Response Microgrant COVID-19," Excel database, <u>https://ecf8563f-f8c6-4ec9-b9c3-</u>

8cb33594287b.filesusr.com/ugd/6c7634_0593dd70dcd34249a87c22424f95c0c5.xlsx?dn=GeneralHFs_COVID19%20Facilities.xls_x.

¹³³ Open Government Partnership Secretariat, Facebook post, 10 June 2020.

¹³⁴ OGP Secretariat Liberia, *Report: Liberia Government's Response to COVID 19, Impact on Citizens* (Liberia: OGP Secretariat Liberia), 2020, <u>https://www.ogpliberia.org/_files/ugd/5a1350_7c1fe0647351421a9a9c94d959dd36d3.pdf</u>.