

Western Balkan PAR Monitor:

STRATEGY FOR PUBLIC ADMINISTRATION REFORM

2024/2025



CONTENTS

AUTHORS	3
ABOUT WEBER 3.0	4
ACKNOWLEDGEMENTS	5
EXECUTIVE SUMMARY	7
LIST OF ABBREVIATIONS AND ACRONYMS	10
I. WEBER PAR MONITOR: WHAT WE MONITOR AND HOW?	11
I.1 WEBER'S APPROACH TO MONITORING PAR	11
I.2 WHY AND HOW WEBER MONITORS THE "STRATEGY FOR PAR" AREA	13
II. STRATEGY FOR PAR: COMPARATIVE WESTERN BALKAN FINDINGS	18
II.1 TRANSPARENCY AND INCLUSIVENESS IN DEVELOPING PAR PLANNING DOCUMENTS	18
II.2 TRANSPARENCY AND INCLUSIVENESS OF PAR MONITORING AND COORDINATION STRUCTURES	27
III. UNLOCKING REFORM POTENTIAL: OVERCOMING THE CHALLENGES OF TRANSPARENCY AND INCLUSIVENESS IN PAR	34
METHODOLOGY APPENDIX	36
LIST OF REFERENCED SOURCES IN THIS REPORT	44

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ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans. Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level expert support, especially for developing citizen-centred methodology for solving PAR issues at local level.



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- Professor Jan-Hinrik Meyer-Sahling, Professor of Political Science at the University of Nottingham, School of Politics and International Relations;
- Professor Tiina Randma-Liiv, Professor and Chair of Public Management and Policy at Tallinn University of Technology ;
- Ms Maja Handjiska Trendafilova, Director of ReSPA (Regional School of Public Administration);
- Mr Thomas Prorok, Deputy Managing Director of the Austrian-based KDZ Centre for Public Administration Research
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¹ A joint initiative of the European Union and the OECD.

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More information about the WeBER 3.0 project, the WeBER Advisory Council, members of the WeBER Platform and the project's partners can be found at www.par-monitor.org

EXECUTIVE SUMMARY

The assessment of transparency and inclusiveness of the PAR agenda in this report focuses on two critical issues – 1) participatory development of PAR planning documents, that includes non-state actors, and 2) involvement of CSO in the work of the governmental PAR coordination and monitoring mechanisms. For the former, the assessment briefly emphasises basic regulatory requirements for conducting consultations, continuing with the assessment of practices in involving external stakeholders and the public in the different stages of policy development for a sample of 16 PAR planning documents adopted since the PAR Monitor 2021/2022. For the latter, this report examines the extent and methods of CSOs' and other non-state actors' involvement in the PAR coordination and monitoring, both at the political and at the administrative levels, highlighting how institutionalised, and how meaningful, any such involvement is in practice. Findings of this report reflect the period since the publication of the PAR Monitor 2021/2022, starting from the second half of 2022, and until the end of 2024.²

Transparency and inclusiveness in developing PAR planning documents remain uneven in the Western Balkans, as in the PAR Monitor 2021/2022. When it comes to the legal framework governing the development of public policy documents, regulations in Kosovo, Montenegro, and Serbia cover consultation procedures and methods most comprehensively. On the other hand, BiH remains the least regulated case: apart from mandatory public debates with prescribed minimal duration, consultations during policy development are not legally required. Importantly, the legal framework in all administrations lacks provisions on the transparency of government-led working groups for policy development, which is in practice used as a method of involving non-state actors.

Consultation practices continue to vary across the Western Balkans, and overall engagement has not advanced beyond the levels observed in the previous monitoring cycle. While no stakeholder consultations took place in Bosnia and Herzegovina (BiH) or Montenegro, Kosovo and Albania presented mixed approaches, with consultation efforts inconsistent across different PAR planning documents. The use of open calls for non-state actor participation also remained uneven: North Macedonia stood out by employing at least two channels to disseminate the consultation announcement for each of the analysed documents, whereas no open calls were recorded in Albania.

² For 2022, only developments not captured by the PAR Monitor 2021/2022 are included.

Furthermore, responsible institutions across the region demonstrated limited proactiveness in reaching out to external stakeholders, as several key documents lacked any formal invitation for broader input.

Despite these challenges, some improvements were observed in terms of provision of complete information on consultations, particularly in Serbia and North Macedonia. Participants in the consultations were mainly provided with complete information needed to participate in the process. However, a lack of publicly available feedback on the comments received was recorded across all administrations. Public debates were widely conducted, with BiH, Serbia, and partly Albania, emerging as best practice examples. Nevertheless, in Montenegro and Kosovo, public debates were not organised. Finally, key informants – non-state actors who participated in the development of the analysed sample documents - expressed satisfaction with the transparency and inclusiveness of the PAR policy development process in Serbia and North Macedonia, while highlighting significant concerns. Namely, although reflecting positively on the process, key informants in Serbia pointed out that the development process was transparent and inclusive from the point of view of participants, but not necessarily from the point of view of interested parties which were not directly involved as members of the working groups. The findings indicate that further efforts are needed to ensure transparency and inclusiveness of the process across the region.

Compared to the PAR Monitor 2021/2022, participation of non-state actors in the government-established PAR coordination and monitoring mechanisms is similarly scarce across the Western Balkans, with some noteworthy improvements. Bosnia and Herzegovina and Kosovo continue to exclude CSOs from these bodies, while in other countries, participation is formally acknowledged but varies in scope and method. Since the last PAR Monitor, Montenegro remains the regional best practice for granting CSOs full membership in the political level coordination body – the PAR Council. North Macedonia has seen the most significant improvement, as it has opened administrative PAR coordination to CSO participation, aligning more closely with Serbia's model of selecting CSOs for membership in an open process. However, compared to the previous monitoring cycle, meeting schedules of PAR coordination and monitoring bodies have not become more regular which limits the impact of civil society participation: Montenegro's PAR Council has met twice annually, North Macedonia's PAR Secretariat has convened in irregular annual intervals, and Serbia's Interministerial Project Group, though more active, has also lacked a predictable schedule. Albania's Integrated Policy Management Group has met only once, with no evidence of CSO involvement. These findings show that the space for civil society influence in the PAR development processes remains uneven and rather limited.

Transparency of the PAR agenda – a new aspect of PAR Monitor’s focus monitored for the first time – is also a challenge. Albania and Kosovo lack an online repository of all relevant documents and information: PAR planning documents, implementation reports, acts on establishment and governing their work, as well as meeting minutes. Serbia stands out as the best example, providing comprehensive, up-to-date information through its Online Monitoring Tool for PAR. Despite these shortcomings, key informants – CSOs which participated in PAR coordination bodies – generally view these mechanisms favourably, particularly in Serbia and North Macedonia, citing timely access to materials and meaningful engagement. However, as in the PAR Monitor 2021/2022, concerns persist over the limited decision-making power of administrative bodies, as key informants perceive political level bodies as primarily responsible for major policy decisions.

LIST OF ABBREVIATIONS AND ACRONYMS

ALB	Albania
AP	Action Plan
BiH	Bosnia and Herzegovina
CSO	Civil Society Organisation
EU	European Union
FOI	Freedom of Information
IMPG	Interministerial Project Group
IPMG	Integrated Policy Management Group
KS	Kosovo
MCPAR	Ministerial Council for PAR
MKD	North Macedonia
MNE	Montenegro
OAO	Organisation, Accountability and Oversight
PAR	Public Administration Reform
PFM	Public Financial Management
PSHRM	Public Service and Human Resource Management
ReSPA	Regional School of Public Administration
SIGMA	Support for Improvement in Governance and Management
SRB	Serbia
WeBER3.0	Western Balkan Enablers for Reforming Public Administrations
WG	Working Group

I. WEBER PAR MONITOR: What we monitor and how

I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the Western Balkans to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is one of the main project results, seeking to facilitate civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the SIGMA *Principles of Public Administration*³ were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024. This was done in order to keep the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.⁴

³ Available at: <https://www.sigmaweb.org/publications/principlesofpublicadministration.htm>

⁴ For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>

Table 1: Main changes in the PAR Monitor methodology

STRUCTURE

- Introduction of a single indicator per PAR area, divided into sub-indicators. Each sub-indicator further consists of several elements (specific criteria assessed).
- Introduction of types of indicator elements, meaning that each element has a specific focus on one of the following aspects of reform:
 - 1) Strategy and policy,
 - 2) Legislation,
 - 3) Institutional set-up,
 - 4) Practice in implementation, and
 - 5) Outcomes and impact.
- Introduction of a 100-point scale, allowing for a more nuanced assessment of progress in each PAR area.

DATA SOURCES

- Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the monitored processes. These interviews serve as a data source for the “Outcomes and impact” elements instead of the formerly implemented survey of civil society organisations.
- Use of public perception survey results as a data source for “Outcomes and impact” elements, and expanding its scope to complement the assessment in five PAR areas (all except for “Strategy for PAR”).
- Removal of survey of civil servants as a data source, due to persistent issues with ensuring adequate response rates across the region’s administrations.

PAR MONITOR REPORTING

- Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.
- Six regional Western Balkan overview reports, one per PAR area (6 in total).

I.2 Why and how WeBER monitors the “Strategy for PAR” area

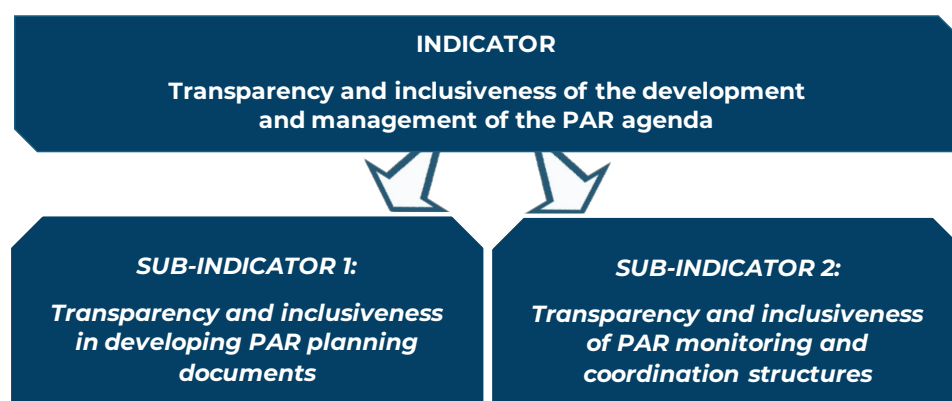
WeBER’s focus on PAR policy development and coordination is crucial for several reasons. A well-developed strategic framework for PAR – clear framework of PAR planning documents that define goals, measures, activities, and funding – provides for a clear roadmap for reforming the way public institutions interact with citizens. In order to keep reform process on track and ensure meaningful progress, external monitoring of government commitments to transparency and inclusiveness in this area is essential. This is where the role of non-state actors comes to the fore, by applying external pressure on governments to meet their commitments and regularly report on progress. Moreover, allowing non-state actors to participate in both the development and monitoring of PAR planning documents’ implementation strengthens the principles of transparency and inclusiveness - core tenets of good governance. Without these principles, no policy, including PAR as an overarching reform, can be effectively implemented for the society’s benefits. Ensuring civil society and other non-state actors’ engagement in processes of PAR policy development and coordination is, therefore, not only beneficial but essential for government accountability and long-term public administration improvement.

Monitoring in **the “Strategy for PAR” area** is based on the one SIGMA Principle in this area:



Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

This Principle is entirely assessed from the perspective of quality of civil society and public involvement in the processes of developing PAR strategic documents and participation in the monitoring and coordination structures that should ensure their purposeful implementation. A focus on inclusivity and transparency aims to determine the extent to which relevant stakeholders’ needs and views are consulted and taken into consideration when developing and implementing PAR agendas.



The monitoring period for the Strategy of PAR covers developments since the last PAR Monitor cycle, that lasted from January until November 2022. Thus, this report focuses primarily on 2023 and 2024, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The first sub-indicator⁵ focuses on the existence and quality of consultation processes in the development of PAR planning documents - official strategies/strategic plans, plans/programmes, their action plans, or any other type of PAR planning document with a minimum two-year implementation period, formally approved/adopted by the government or parliament. It assesses whether transparency and inclusiveness in the development process are legally regulated, continuing with the practical aspects of administering consultations – whether non-state stakeholders were engaged early, invited openly and proactively, provided with complete information, and given publicly disclosed feedback on their contributions. Additionally, it examines whether the public had the opportunity to contribute on draft documents through public debates, and finally, assesses the perceived impact of consultations on transparency and inclusiveness from the view of consultees.

Monitoring of legislation and practice aspects is performed by combining data sources to ensure reliability of results, including qualitative analysis of strategic documents, and official data that is publicly available or obtained from PAR responsible institutions. For the assessment of the outcomes and impact, researchers conduct key informants' interviews with non-state actors who participated in consultative processes.

Indicator elements that are assessed under the first sub-indicator are listed in the Table 2.

⁵ Through the first sub-indicator, the following SIGMA sub-principle is monitored: All relevant stakeholders are regularly consulted and involved in PAR planning and monitoring; PAR is effectively communicated, and values of good public administration are promoted.

Table 2: Indicator elements under the sub-indicator 1

Indicator element - number and title	Type
E1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation
E1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation
E1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation
E1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation
E1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation
E1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation
E1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation
E1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact

The assessment is done on a sample of PAR planning documents adopted in 2023 and 2024, along with those adopted in late 2022 after the completion of the last PAR Monitor's monitoring period. The sample for the sub-indicator 1 is presented in Table 3.

Table 3: Sample documents analysed within sub-indicator 1

Admini- stration	Sample size	Sample PAR planning document
ALB	4	Roadmap for the Public Administration Reform 2023-2030
		Public Financial Management Strategy for the period 2023-2030
		National Cross-cutting Strategy for Decentralisation and Local Governance for the period 2023-2030 and Action Plan for the period 2023 – 2025
		Cross-cutting Strategy “Digital Agenda of Albania” and Action Plan for the period 2022-2026
BiH	1	The Annual Action Plan for 2024 of the Strategy for Enhancing Public Financial Management in the Institutions of Bosnia and Herzegovina
KS	5	Public Administration Reform Strategy for the period 2022-2027
		Public Finance Management Strategy for the period 2022 - 2026
		Administrative Burden Prevention and Reduction Programme for the period 2022-2027
		eGovernment Strategy for the period 2023-2027
		National Development Strategy for the period 2022-2030
MKD	2	Public Administration Reform Strategy for the period 2023-2030
		Action Plan for Public Finance Management for 2023
MNE	2	Public Finance Management Reform Programme for the period 2022-2026
		Action Plan for the period 2024-2025 for Digital Transformation Strategy for the period 2022-2026
SRB	2	eGovernment Development Programme for the period 2023-2025
		Action Plan for the period 2024-2025 for the Local Self-Government System Reform Programme for the period 2021-2025

The second sub-indicator⁶ monitors civil society participation in PAR coordination and monitoring structures at both the political and administrative levels. It focuses exclusively on bodies established for the most comprehensive PAR strategic document (e.g., PAR strategies). The assessment first examines whether the strategic PAR agenda provides for civil society participation in these structures. It then analyses the institutionalisation of this participation — specifically, the format of CSO involvement in administrative and political PAR coordination bodies and whether selection processes are open and competitive. When it comes to practice, the sub-indicator assesses the regularity of meetings with CSO participation and the transparency of communication regarding the work of PAR coordination and monitoring bodies. Finally, it assesses whether CSOs can meaningfully contribute to these bodies' work, as an indication of outcome of participatory approach to PAR agenda coordination and monitoring.

The assessment is based on the review of official documents and designated websites related to the organisation and functioning of PAR coordination and monitoring structures. To assess outcomes and impact, researchers conduct key informant interviews with civil society representatives who are members of these bodies or have attended their sessions as invitees.

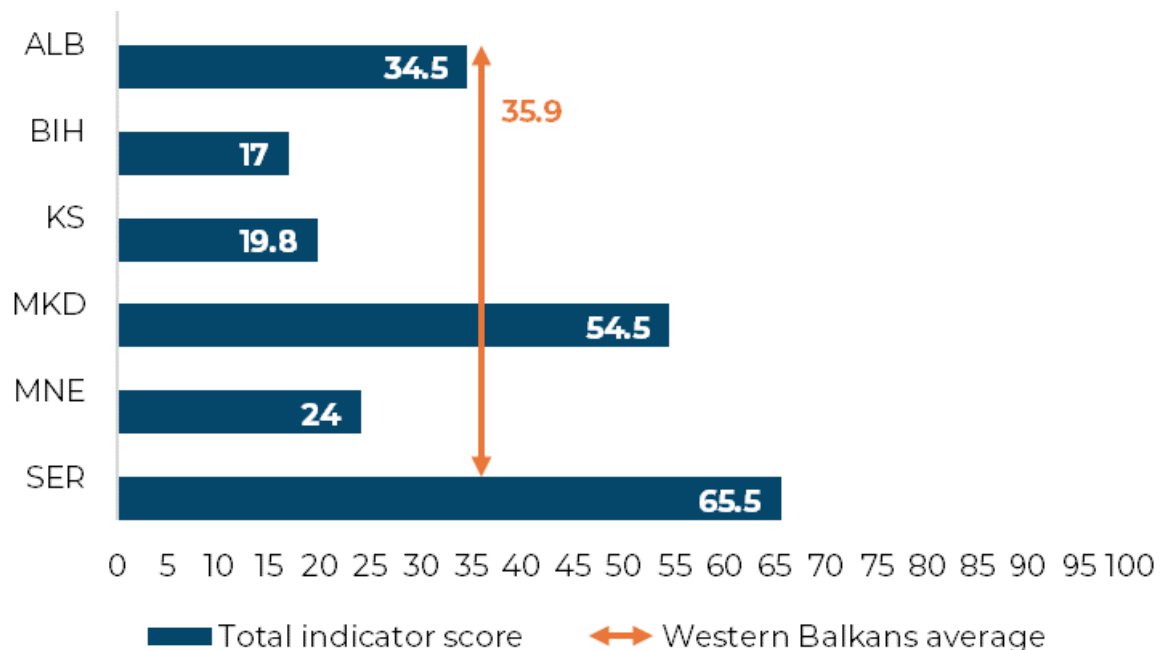
Indicator elements that are assessed under the sub-indicator 2 are listed in the Table 4.

Table 4: Indicator elements under the sub-indicator 2

Indicator element - number and title	Type
E2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy
E2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional set up
E2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional set up
E2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional set up
E2.5 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	Practice in implementation
E2.6 The work of PAR monitoring and coordination structures is communicated transparently	Practice in implementation
E2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact

⁶ Through the second sub-indicator, the following SIGMA sub-principle is monitored: PAR is co-ordinated at political and administrative levels; sufficient resources are allocated, and the planned reforms are effectively implemented and monitored

II. STRATEGY FOR PAR: Comparative Western Balkan findings



National reports for the PAR Strategy area for all WB administrations are available at: www.par-monitor.org

II.1 Transparency and inclusiveness in developing PAR planning documents

Since the previous PAR Monitor cycle, 16 PAR planning documents have been adopted across the Western Balkan administrations. The Roadmap for Public Administration Reform, adopted in 2023, has set the basis for the development of more detailed strategies in the area of PAR in Albania, however, it provides priority measures for all PAR areas without clarifying institutional responsibilities or costing. Bosnia and Herzegovina has established a comprehensive PAR agenda through six planning documents: the Strategic Framework for PAR (extended to 2027), the Comprehensive Public Financial Management Strategy adopted in 2022 and four PFM strategies, one for each level of administration. Still, tangible results are not yet visible. Similarly, the PAR framework of Montenegro sets the agenda with well-designed planning

documents, but with low levels of implementation rate which limits the impact of the planned reform activities. The strategic framework for PAR in Kosovo was completed as of December 2022 with the adoption of the PAR and PFM Strategy. Although they together cover all key PAR thematic areas, their implementation heavily relies on donor support. Similar issues were noticed in the case of North Macedonia, where the implementation of the PAR Strategy and the PFM Reform Programme largely depend on foreign sources of funding. Nonetheless, the PAR Strategy established a comprehensive reform framework for all priority areas. Finally, an elaborate PAR agenda in Serbia was established in 2021, with four out of six substantive areas covered by several subordinated planning documents (i.e. programmes, with the exception of the PSHRM and OAO area). Still, similar issues are identified here as in other Western Balkan administrations – low level of implementation rates and low level of domestic funding of the planning documents' activities.⁷

The relevant legal framework in almost all WB countries mandates various requirements which provide for transparency and inclusiveness of the PAR planning documents development process. These include conducting stakeholder consultations and public debates, publication of consultation reports, and the inclusion of non-state actors in working groups—along with provisions on the transparency of the selection process. The only exception was noted in the BiH, where the legal obligation is limited to the public debates. Moreover, regulations in Albania and North Macedonia lack provisions on the inclusion of non-state actors in working groups, while transparency of working groups' proceedings remains unregulated in all WB administrations. The absence of a legal basis for transparency in working group proceedings has significant implications for the practice of state administration bodies, resulting in the lack of publicly available information, limiting public insight into policymaking processes and ultimately undermining accountability.

Despite consultations with stakeholders and target groups (consultations in the early phase, before the public debate) being mandatory when developing PAR planning documents,⁸ significant shortcomings were identified regarding how consultations are organised by the relevant institutions. The analysis indicates that minimal standards of transparency and inclusiveness in consultation processes are often not reached within one consultation process. The standards include a minimal duration of 15 days for submission of written contributions or seven days for preparation for other consultation methods, publication of working documents in case of written contributions and at least one open call

⁷ Additional information is available in SIGMA/OECD reports for 2024 on the Assessment against the Principles of Public Administration for each WB country. Available at: <https://tinyurl.com/3f9ua2pt>

⁸ With the abovementioned exception of Bosnia and Herzegovina.

for participation for other methods, and, finally, organisation of a meeting with stakeholders.⁹ The best results were recorded for sample documents in North Macedonia and in the case of the AP for the LSG System Reform Programme in Serbia, where all criteria were met. The results for sample documents in Kosovo and Albania demonstrated significant variation in practice within a single administration (see Table 5 below). On the other hand, consultations were not organised for sample documents in BiH and Montenegro.¹⁰ These findings show that responsible institutions oftentimes do not provide conditions for meaningful contribution of non-state actors, even when consultations are organised.

Table 5: Early phase consultations with non-state actors

<i>PAR planning document</i>	<i>duration of at least 15 days for written contributions or participants have at least seven days to prepare in other cases</i>	<i>publication of working documents for written contributions or at least one open call for participation in other cases</i>	<i>Meeting with external stakeholders</i>
ALB			
Roadmap for PAR	✓	x	✓
PFM Strategy	✓	x	✓
National Cross-cutting Strategy for Decentralisation and Local Governance	✓	x	✓
Cross-cutting Strategy "Digital Agenda of Albania	x	x	x
BiH			
AP for the Strategy for Enhancing PFM in Institutions of BiH	x	x	x

⁹ Although taken into consideration for the purpose of the assessment, working groups are not a method of consultations. They are established each time a public administration body prepares a draft public policy document. They are in charge of their development and should include target groups, such as CSOs, expert organisations, business organisations, etc. However, this is not a substitution for consultations with target groups and interested parties, which can be conducted using a number of different techniques.

¹⁰ Stakeholder meetings were held in Montenegro for the AP for the Digital Transformation Strategy, although consultations were not organised. The research confirmed that the responsible institution organised this informal meeting with representatives of business and expert associations and the academic community. At the beginning of the process mini teams were formed, composed of members of the Coordination Body for managing the digital transformation process and relevant representatives with extensive experience in the field of digital transformation. This information was provided by the Ministry of Finance of Montenegro on November 25th, 2024, as a response to an FOI request.

KS			
PAR Strategy	X	X	X
PFM Strategy	✓	✓	X
National Development Strategy	X	X	X
Administrative Burden Prevention and Reduction Programme	✓	X	✓
eGovernment Strategy	✓	X	✓
MKD			
PAR Strategy	✓	✓	✓
AP for PFM	✓	✓	✓
MNE			
PFM Reform Programme	X	X	X
AP for Digital Transformation Strategy	X	X	✓
SRB			
eGovernment Development Programme	✓	X	✓
AP for the LSG System Reform Programme	✓	✓	✓

The use of multiple channels to inform stakeholders about the consultation process is another key requirement affecting the transparency and inclusiveness of the development of PAR planning documents. However, results indicate that their use was both limited and inconsistent within the individual administrations. On a positive note, for both analysed documents in North Macedonia, the sponsoring ministry used two channels to inform the public – the website of the responsible institution and the website of the relevant partner institution (in this case, via the platform “Dialogue with Civil Society Organisations - Platform for Structural Participation in EU Integrations”). The same channels were used for the AP for the LSG System Reform Programme in Serbia. In contrast, in Kosovo, the only channel used was the public consultation portal, and even then, only for the eGovernment Strategy. Finally, responsible institutions in Albania, BiH and Montenegro did not advertise the invitations on public channels of communication. The overall negative results indicate a clear need for stronger enforcement of requirements for notification of the public, in order to broaden stakeholder engagement opportunities.

Responsible institutions still exhibit a low level of proactiveness in terms of ensuring the participation of a wider range of external stakeholders, a practice also recorded in previous PAR Monitor cycles. The best results can be seen in the case of the PAR Strategy of North Macedonia, where five different groups were included in the development process (see Table 6 below). On the other hand, none of these stakeholder groups were approached during the development of the AP for the Strategy for Enhancing PFM in BiH, the Cross-cutting Strategy “Digital Agenda of Albania”, PFM Reform Programme of Montenegro, and three (out of five) sample documents in Kosovo – the PAR and PFM strategies, and the National Development Strategy. Expert associations were the most frequently represented among the stakeholder groups, given their inclusion in the development of eight out of 16 sample documents at the regional level. Importantly, organisations dealing with the rights of people with disabilities were not included in the development of any sample document, which could lead to significant oversights in addressing the perspectives and needs of vulnerable groups, especially when developing comprehensive reform documents, such as PAR strategies.

Table 6: stakeholder groups included in the development of PAR planning documents

<i>PAR planning document</i>	<i>Business associations</i>	<i>Trade unions</i>	<i>Expert associations/ professional organisations</i>	<i>Academic community and universities</i>	<i>Gender equality and/or women rights organisations</i>	<i>Rights of persons with disabilities organisations</i>
ALB						
Roadmap for PAR	X	X	✓	✓	X	X
PFM Strategy	X	X	✓	X	✓	X
National Cross-cutting Strategy for Decentralisation and Local Governance	X	X	✓	X	X	X
Cross-cutting Strategy “Digital Agenda of Albania	X	X	X	X	X	X

BIH						
AP for the Strategy for Enhancing PFM in Institutions of BiH	X	X	X	X	X	X
KS						
PAR Strategy	X	X	X	X	X	X
PFM Strategy	X	X	X	X	X	X
National Development Strategy	X	X	X	X	X	X
Administrative Burden Prevention and Reduction Programme	✓	X	✓	X	✓	X
eGovernment Strategy	✓	X	✓	X	X	X
MKD						
PAR Strategy	✓	✓	✓	✓	✓	X
AP for PFM	X	X	X	✓	✓	X
MNE						
AP for Digital Transformation Strategy	✓	X	✓	✓	X	X
PFM Reform Programme	X	X	X	X	X	X
SRB						
eGovernment Development Programme	✓	X	✓	X	X	X
AP for the LSG System Reform Programme	✓	X	X	✓	X	X

This monitoring cycle revealed improvements in how responsible institutions across parts of the WB provide complete consultation information, which includes primarily the provision of necessary working and preparatory documentation

to the participants in the process, but also information on the duration of the consultations and the channels for submission of contributions. Specifically, institutions in Serbia and North Macedonia offered all necessary information for each sample document, while institutions in Albania did so for three out of four documents, with the Cross-cutting Strategy “Digital Agenda of Albania” as the exception. Moreover, in Kosovo, complete information was provided for three sample documents, excluding the PAR Strategy and the National Development Strategy.¹¹ The cases where the sponsoring institutions failed to provide the most basic information and documents needed for meaningful participation indicate the persistence of the approach where consultations are conducted to fulfil a formal requirement rather than out of a genuine will to incorporate the views of key external stakeholders into the PAR planning documents.

Continuing previously established bad practices, most administrations failed to provide and publish detailed feedback on the comments submitted during the consultations. Kosovo displayed the strongest practices, as three out of five sample documents met all the required criteria—showing comments alongside the identities of their submitters, explaining how each comment was resolved, and publishing this feedback online. Albania followed with two out of four documents meeting all criteria: the PFM Strategy and the National Cross-cutting Strategy for Decentralisation and Local Governance. In contrast, no feedback information was available for the PAR Strategy of North Macedonia, while two or fewer criteria were met in the remaining cases.¹² These findings highlight persistent shortcomings of the administrations when it comes to the creation of trust in the consultation process, for which feedback on comments and information on their treatment is crucial.

Towards the end of the development process, the national authorities opened the PAR planning process to the public via public debates for the majority of sample documents, with the exception of sample documents in Kosovo and the AP for Digital Transformation Strategy of Montenegro. The public debates represent an important mechanism for involving the wider public and including them in the decision-making process, even at a stage where major interventions in the policy direction are impossible. Out of those documents for which public debates were organised, all documents in BiH and Serbia met the required criteria – the call for submission of contributions was published online along with the draft document, information on channels of communication and the report, and the debate lasted at least 15 days. Moreover, all criteria were met in the case of one document in North Macedonia and two out of four documents in Albania (see Table 7 below).

¹¹ No consultations were organised for the sample documents in BiH and Montenegro, thus none of the criteria could be assessed.

¹² Apart from BiH and Montenegro, and the PAR Strategy and the National Development Strategy of Kosovo, where consultations were not organised.

Table 7: Completeness of information on public debates

<i>PAR planning document</i>	<i>online publication of a call</i>	<i>publishing the draft planning document</i>	<i>information on channels for submitting comments</i>	<i>duration of minimum 15 days</i>	<i>published report</i>
ALB					
Roadmap for PAR	✓	✓	✓	✓	X
Cross-cutting Strategy "Digital Agenda of Albania"	X	✓	X	✓	X
PFM Strategy	✓	✓	✓	✓	✓
National Cross-cutting Strategy for Decentralisation and Local Governance	✓	✓	✓	✓	✓
BIH					
AP for the Strategy for Enhancing PFM in Institutions of BiH	✓	✓	✓	✓	✓
KS					
Administrative Burden Prevention and Reduction Programme	X	X	X	X	X
eGovernment Strategy	X	X	X	X	X
National Development Strategy	X	X	X	X	X
PAR Strategy	X	X	X	X	X
PFM Strategy	X	X	X	X	X
MKD					
AP for the PFM	X	X	X	✓	✓
PAR Strategy	✓	✓	✓	✓	✓
MNE					
PFM Reform Programme	✓	✓	✓	✓	X
AP for Digital Transformation Strategy	X	X	X	X	X
SRB					
eGovernment Development Programme	✓	✓	✓	✓	✓
AP for the LSG System Reform Programme	✓	✓	✓	✓	✓

Finally, interviews with non-state actors who took part in the sample PAR documents development revealed partially positive stances regarding the transparency and inclusiveness of the PAR planning documents development process.¹³ Namely, key informants in Serbia and North Macedonia expressed their satisfaction with both these aspects, while those in Albania and Kosovo were slightly more critical (see Table 8 below). However, several significant concerns were highlighted. Two key informants in Serbia pointed out that the PAR planning documents development process was transparent and inclusive from the point of view of participants in the process, but not necessarily from the point of view of interested parties which were not directly involved as members of the working groups. Moreover, one key informant in Albania stated that inclusion is dependent on personal contacts, rather than formal procedures and rules and that although comments do get accepted during the drafting process, their impact on the development of the document remains insignificant. The lack of reliance on institutional mechanisms highlights systemic weaknesses that can significantly undermine the potential of the consultation process, restricting the involvement of diverse stakeholders

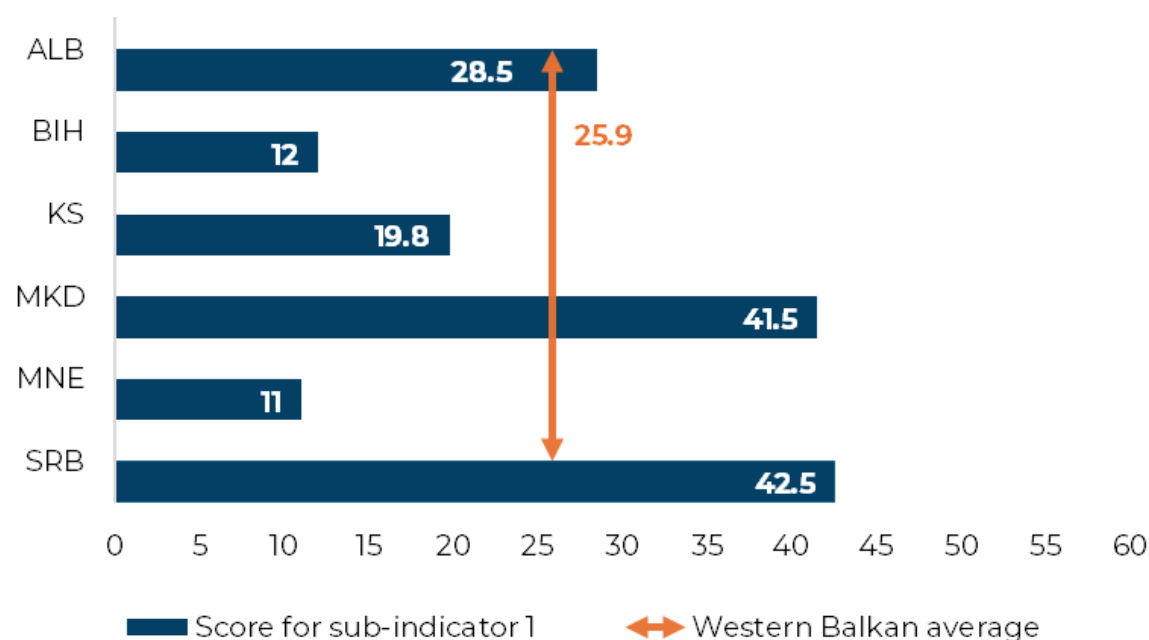
Table 8: number of non-state actors' responses to the statement per agreement scale.

Statement	Administration ¹⁴	Fully disagree	Tend to disagree	Tend to agree	Fully agree
The development process of the PAR planning document was transparent	ALB		1	1	1
	KS		2	1	1
	MKD			1	2
	SRB			3	
The development process of the PAR planning document was inclusive	ALB		1	1	1
	KS		3	1	
	MKD			1	2
	SRB			2	1

¹³ Key informant interviews were not conducted in BiH and Montenegro since consultations with stakeholders were not organised for the sample documents

¹⁴ The table provides an overview of perceptions only for those administrations who scored points for Element 1.2 Consultations with non-state actors are conducted during the development of PAR planning documents (see table 12, in the Methodology Appendix), and where consultations with non-state actors were conducted. As a rule, three non-state actors were interviewed per administration, except for Kosovo (due to the sample of documents).

Sub-indicator 1: Transparency and inclusiveness in developing PAR planning documents¹⁵



II.2 Transparency and inclusiveness of PAR monitoring and coordination structures

Since the last PAR Monitor, institutional reorganisations have impacted PAR coordination and monitoring in parts of the Western Balkans. The Government of Albania has created a ministerial post for public administration and anti-corruption, assuming political responsibility for PAR, while North Macedonia's frequent leadership changes have disrupted coordination. Meanwhile, in Bosnia and Herzegovina, the PAR Coordination Board - bringing together all levels of government - has begun operating. Elsewhere - Kosovo, Montenegro, and Serbia - PAR coordination structures and accountability lines have remained mostly stable despite government changes in some cases. However, coordination challenges persist across the region, and political commitment remains weak¹⁶.

¹⁵ The maximum number of points for this sub-indicator is 60.

¹⁶ Additional information is available in SIGMA/OECD reports for 2024 on the Assessment against the Principles of Public Administration for each WB country. Available at: <https://tinyurl.com/3f9ua2pt>

Despite the changes in the organisation and functioning of PAR monitoring and coordination bodies during the previous period, the overall level of participation of non-state actors in these bodies remained mostly unchanged. As noted in the previous PAR Monitor report, Bosnia and Herzegovina (BIH) and Kosovo remain the only administrations where such participation is not foreseen at any level of PAR coordination and monitoring. In the rest of the region, the role of CSOs is formally acknowledged in the acts establishing monitoring and coordination bodies, though the status of CSOs and their participation methods vary.

At the political level of PAR coordination and monitoring, regional dynamics have remained largely unchanged since the last PAR Monitor. CSOs in Montenegro continue to participate as full members of the PAR Council, whereas in Albania and Serbia, they can contribute to the work of the Integrated Policy Management Group (IPMG) and the PAR Council, respectively, but only upon invitation to specific meetings. CSOs can also be invited to sessions of North Macedonia's PAR Council, suggesting a gradual convergence of practices across the region.

Among the administrations where CSO involvement depends on invitations, Serbia and North Macedonia are cases where the PAR Strategy or the acts establishing coordination and monitoring structures explicitly define the criteria for invitations - limiting them to organisations admitted as members of the administrative PAR coordination mechanism. Nevertheless, Montenegro remains a standout example of best practice in the region, ensuring civil society a formal role at the political level of PAR coordination, which should, in principle, guarantee their regular and substantive participation.

North Macedonia has now joined Serbia in granting CSOs formal membership in administrative PAR coordination and monitoring bodies. A single CSO representative, along with a deputy, has been included as a member of the PAR Secretariat in North Macedonia, while in Serbia, the Interministerial Project Group (IMPG) has continued operating with the participation of six CSO representatives. No changes have been observed in the composition of administrative bodies in BIH, Kosovo, or Montenegro since the last monitoring cycle. However, a noteworthy development in Albania is that representatives of various stakeholder groups, including CSOs, can also be invited to administrative PAR coordination and monitoring sessions, mirroring the practice at the political level.

Overall, when considering both PAR monitoring and coordination levels, North Macedonia has seen the most substantial shift in its approach to civil society involvement in this aspect of the PAR policy cycle, following the adoption of the new PAR Strategy 2023–2030. Table 9 below provides an overview of PAR monitoring and coordination bodies across the region, highlighting civil society participation in each.

Table 9: PAR monitoring and coordination structures and method of involvement of civil society

Admini- stration	Political level	CSO involvement	Administra- tive level	CSO involvement
ALB	Integrated Policy Management Group	Subject to invitation	Integrated Policy Management Group	Subject to invitation
BiH (state level)	Co-ordination Board for PAR	No involvement	PAR Coordinator	No involvement
KS	Ministerial Council for PAR (MCPAR)	No involvement	MCPAR Secretariat (PAR Department, Ministry of Interior)	No involvement
MKD	PAR Council	Subject to invitation	PAR Secretariat	Formal membership
MNE	PAR Council	Formal membership	Coordination team with 6 thematic bodies; Inter- governmental operational team	No involvement
SRB	PAR Council	Subject to invitation	Inter-Ministerial Project Group	Formal membership

In cases where participation is based on membership (three cases highlighted in green in the table above), CSOs were admitted to PAR monitoring and coordination structures through an open application process. Following the approach established in previous PAR implementation cycles, the Government of Montenegro issued a public call in 2022 for CSOs to nominate two representatives to the PAR Council. This process led to the appointment of two members. Requirements of the selection process were divided into two sets – one for CSOs who are nominating candidates, and another for nominated candidates themselves. In both cases, the Ministry of Public Administration evaluated basic requirements related to the status and experience of applicants.¹⁷

The examples of North Macedonia and Serbia further illustrate a trend of gradual convergence among Western Balkan administrations. In both countries, ministries

¹⁷ Criteria for nominating CSOs, and for nominated candidates, available at: <https://www.gov.me/clanak/javni-poziv-za-predlaganje-predstavnika-ce-nevladinim-organizacijama-za-clana-savjeta-za-reformu-javne-uprave>

responsible for PAR coordination leveraged prior open selection procedures for CSO participation in PAR Strategy development to recruit non-state actors for PAR agenda coordination and monitoring. Instead of launching a new selection process, they formally invited the same CSOs involved in policy development to express interest in membership or nominate representatives. This approach indicates an effort to streamline procedures and ensure continuity in dialogue between CSOs and government institutions across two critical aspects of PAR policy: development and implementation monitoring. While Serbia had already introduced this practice in previous IMPG convocations, North Macedonia adopted it more recently with the launch of its 2023–2030 PAR Strategy. As a result, a member and a deputy now formally represent civil society in the PAR Secretariat in North Macedonia, while Serbia's IMPG includes six civil society representatives.¹⁸

Despite the formal involvement of CSOs in PAR monitoring and coordination bodies across half of the Western Balkan region, their possibility to contribute has been limited since the last PAR Monitor cycle due to irregularity of meetings of these bodies. In Montenegro, the PAR Council has held two sessions annually since 2022, coming closest to the target of at least one meeting every six months. North Macedonia's PAR Secretariat has convened three times since the previous monitoring cycle, with the most recent meeting in December 2024 occurring exactly a year after the previous one. Serbia's IMPG has met more frequently than the other two but still lacks a consistent meeting schedule.¹⁹ Evidence suggests that Albania's IPMG has met only once, in 2023, with no indication that CSOs were invited. Without a predictable convening schedule and with significant gaps between sessions, the influence of CSOs on PAR coordination and monitoring remains limited in practice. Moreover, these inconsistent work patterns raise questions about the effectiveness of PAR monitoring and coordination mechanisms as they currently function.

Furthermore, the work of PAR monitoring and coordination structures lacks sufficient transparency. In two cases - Albania and Kosovo - there is no centralised online platform that provides up-to-date PAR planning documents and monitoring reports.²⁰ In contrast, Serbia stands out as the best practice example, with all relevant information - including decisions establishing PAR coordination and monitoring bodies, their rules of procedure, and meeting records - publicly available and regularly updated through the Online Monitoring Tool.²¹

¹⁸ The Decision on establishing PAR Secretariat not available online due to the organisation restructuring of ministries; decisions on establishing the IMPG available here: <https://monitoring.mduls.gov.rs/struktura/medjuministarska-projektna-grupa.html>

¹⁹ The work of PAR coordination and monitoring bodies can be affected by parliamentary elections, technical Government, or reorganisation of state bodies like in North Macedonia and Serbia in this monitoring cycle.

²⁰ A new PAR monitoring platform has been introduced in Kosovo, though with only PAR strategic document available online at the time of the assessment. Available at: <https://rap.rks-gov.net/>

²¹ Online Monitoring Tool, available at: <https://monitoring.mduls.gov.rs/>

Table 10: Online transparency of the PAR monitoring and coordination bodies' work

Admin- istration	PAR planning documents	Implementa- tion reports	Decisions on esta- blishment	Rules of procedure	Meeting minutes
ALB	x	x	x	x	x
BIH	✓	✓	x	x	x
KS	x	x	x	x	x
MKD	✓	✓	✓	x	✓
MNE	✓	✓	✓	✓	x
SRB	✓	✓	✓	✓	✓

Despite transparency challenges, non-state actors who participated in the work PAR coordination and monitoring bodies have moderately favourable perceptions of how these bodies operate in practice (see table below). Their views positively highlight two aspects of participation: the timely provision of preparatory materials and the opportunity for meaningful contribution. Interviewees expressed the highest levels of agreement regarding the operations of North Macedonia's PAR Secretariat and Serbia's IMPG. However, some also noted that administrative bodies have limited decision-making power, with key decisions ultimately being made at the political coordination level. Also, interviewees in Montenegro particularly expressed strong reservations that they can meaningfully contribute to the PAR Council in practice. Such insights still emphasise a discrepancy between the perceptions of formal preconditions for active involvement and the practical limitations non-state actors experience.

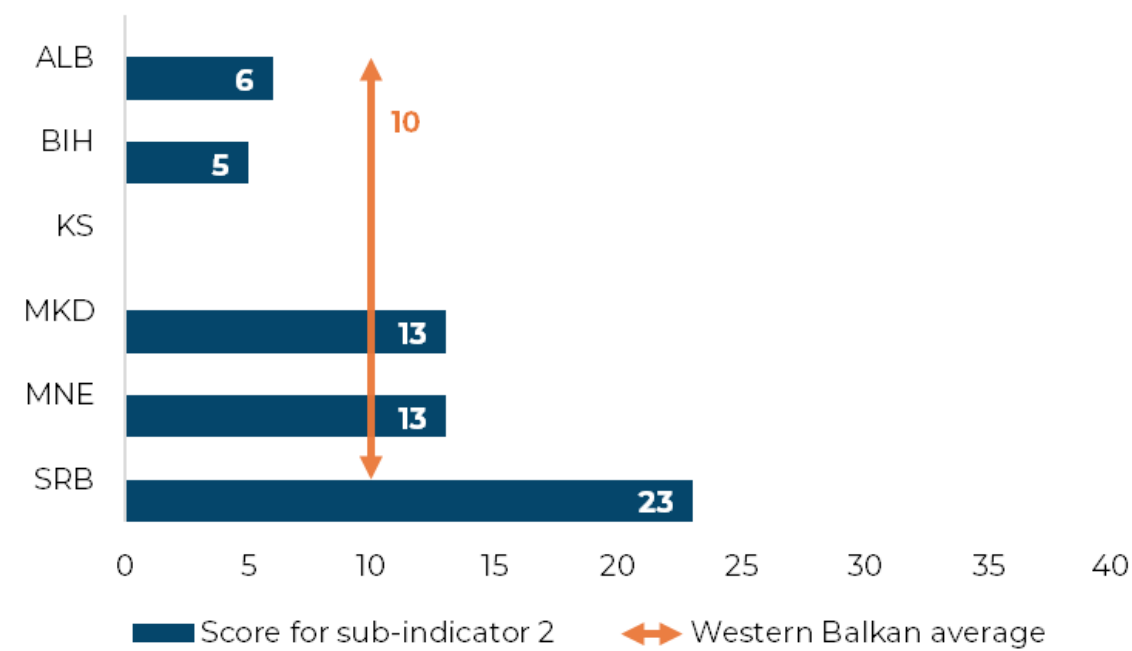
Table 11: Number of non-state actors' responses per agreement scale

Statement	Admini- stration ²²	Fully disagree	Tend to disagree	Tend to agree	Fully agree
Materials for preparation for meetings of administrative structures are provided timely	ALB ²³		1	1	1
	MKD			2	1
	SRB			2	1
Materials for preparation for meetings of political structures are provided timely	ALB		1	1	1
	MNE				2
Meetings of administrative structures allow meaningful contribution	ALB		1	1	1
	MKD			3	
	SRB			3	
Meetings of political structures allow meaningful contribution	ALB		1	1	1
	MNE		2		

²² The table provides an overview of perceptions only for those administrations who scored points for the Element 2.1 *Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda* (see table 13 in the Methodology Appendix), and at the level of PAR coordination and monitoring where participation took place. For these reasons, BIH and Kosovo are not presented. As a rule, three non-state actors were interviewed per administration, except for Montenegro (with two members of the PAR Council).

²³ There was no involvement of non-state actors in the work of PAR coordination and monitoring bodies in the observed period and interviews were organised with participants who took part in earlier meetings instead. Nevertheless, Albania scored 0 points on perceptions of non-state actors as there was no agreement among all three interviewees.

Sub-indicator 2: Transparency and inclusiveness of PAR monitoring and coordination structures²⁴



²⁴ The maximum number of points for this sub-indicator is 40.

III. UNLOCKING REFORM POTENTIAL: Overcoming the Challenges of Transparency and Inclusiveness in PAR

Transparency and Stakeholder Engagement: The Missing Pillars of Effective Policy Development

The absence of clear legal provisions on transparency and inclusiveness in the development of public policy documents, including PAR planning documents, has a negative impact on the reform processes across the Western Balkans. Without mandatory stakeholder consultations, the PAR agenda development process will remain limited by institutional perspectives. Strengthening legal frameworks to ensure transparency and inclusiveness at all stages of the PAR policymaking process, especially in terms of greater transparency of government-led working groups, is essential for fostering accountability and improving the overall quality of PAR.

When it comes to PAR policy development in practice, it is narrowed by the inconsistent organisation of early-stage consultations with stakeholders, the lack of use of open calls and low institutional proactivity by the Western Balkan administrations in ensuring participation of various stakeholder groups. Responsible institutions for PAR should make a long-standing commitment to actively engage diverse stakeholders, to ensure that these policies reflect the needs of various societal groups, particularly those most vulnerable.

Furthermore, the quality of consultation practices has been found to vary significantly even within the same administration depending on the institution in charge of developing a specific PAR planning document. This indicates the need to harmonise institutional procedures and ensure uniformity within the administrations, using positive examples as inspiration. Although these issues have persisted throughout the PAR Monitor cycles, some improvements have been also recorded, for instance, in terms of provision of more complete information to non-state actors ahead of consultation processes (such as provision of working documents, information on the timeline and channels for submission of comments).

Still, a lack of publicly available feedback on the comments received was once again recorded across the Western Balkans. Moreover, the insights provided by non-state actors, participants in the PAR policy development highlight a distinction between formal consultation mechanisms and their actual impact on inclusiveness and transparency. On a broader scale, the WB administrations

should focus on improving the quality of the consultation processes, rather than just “ticking the boxes” on formal mechanisms of participation.

Overall, without mechanisms to demonstrate how stakeholder input influences policy decisions, the inclusiveness of consultations remains superficial. All WB administrations should establish and observe clear consultation reporting procedures, including provision of detailed feedback on the received inputs and transparent and timely publication of consultation reports. This would be a strong signal of respect for the time and effort invested by the consultees in the PAR development process. Moreover, it would help nurture a culture of trust and dialogue between the administrations and external stakeholders.

Weak Participation, Weaker Reforms: The Risks of Limited Participation in PAR Coordination and Monitoring

While formal CSO participation in PAR coordination and monitoring remains in place across half of the Western Balkans, its effectiveness is undermined by irregular meetings and limited transparency. At the same time, weak authorities of the administrative-level coordination structures, coupled with almost non-existing practice of opening political-level coordination bodies for non-state actors, speaks of no fundamental progress compared to past PAR Monitor cycles. Without consistent engagement and structured processes, CSOs risk being relegated to a purely observational role.

The unpredictable meeting schedules of PAR coordination and monitoring structures, combined with scant information regarding their work, not only weaken CSO involvement but also erode trust in the governments' commitment to PAR. In no Western Balkans administration did these structures meet regularly in 2023 and 2024, and when they did, their work was not transparently communicated —such as through publicly available meeting reports. As this pattern persists across monitoring cycles, confidence in the process gradually declines, potentially discouraging future CSO engagement.

In the future, Western Balkan PAR coordinators should ensure predictable convening schedules and clear procedural commitments to reinforce the credibility of PAR monitoring and coordination structures. At the same time, they need to ensure greater transparency levels as a prerequisite for more meaningful contribution of non-state actors. Finally, PAR monitoring and coordination structures on both political and administrative level should open towards involving external stakeholders in their work. Without these improvements, the impact of PAR monitoring and coordination bodies, as well as of participating CSOs, will likely remain procedural rather than substantive, ultimately undermining the reform agenda itself.

METHODOLOGY APPENDIX

Table 12: Score for sub-indicator 1 - Transparency and inclusiveness in developing PAR planning documents

Sub-indicator elements	Element type	Maximum points	ALB	BiH	KS	MKD	MNE	SRB
E 1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation	5	3	2	4	3	4	4
E 1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation	9	4.5	0	3.6	9	1.5	7.5
E 1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation	8	0	0	0.4	4	0	2
E 1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation	6	1.25	0	1	3.5	1.5	2
E 1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation	9	6.75	0	5.4	9	0	9

E 1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation	9	5	0	5.4	2	0	4
E 1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation	10	8	10	0	7	4	10
E 1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact	4	0	0	0	4	0	4
Total points		60	28.5	12	19.8	41.5	11	42.5

Table 13: Score for sub-indicator 2 - Transparency and inclusiveness of PAR monitoring and coordination structures

Sub-indicator elements	Element type	Maximum points	ALB	BiH	KS	MKD	MNE	SRB
E 2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy	2	2	0	0	2	1	2
E 2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	3	2	0	0	3	0	3

E 2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	3	2	0	0	2	3	2
E 2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional setup	4	0	0	0	2	2	2
E 2.5 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	Practice in implementation	10	0	0	0	0	0	0
E 2.6 Work of PAR monitoring and coordination structures is communicated transparently	Practice in implementation	10	0	5	0	0	5	10
E 2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact	8	0	0	0	4	2	4
Total points		40	6	5	0	13	13	23

For producing this report, the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Interviews with stakeholders and key informants.

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

Table 14. FOI requests

Admini- stration	Institution	Date of request	Date of reply to the request
ALB	Department of Public Administration	20.11.2024.	10.12.2024.
	National Agency for Information Society	20.11.2024.	10.12.2024.
	Ministry of Finances	20.11.2024.	10.12.2024.
	Ministry of Interior	20.11.2024.	16.12.2024.
	Prime Minister's Office	20.11.2024.	no reply
BiH	Ministry of Finance and Treasury	13.11.2024.	20.11.2024.
KS	Office of Prime Minister - Strategic Planning Office	5.11.2024.	18.11.2024.
	Ministry of Internal Affairs	5.11.2024.	7.11.2024.
	Ministry of Finance Labour and Transfers	15.11.2024.	no reply
	Office of Prime Minister - Strategic Planning Office	15.11.2024.	22.11.2024.
	Office of Prime Minister - Strategic Planning Office	15.11.2024.	3.12.2024.
	Office of Prime Minister - Strategic Planning Office	25.11.2024.	9.12.2024.
	Office of Prime Minister - Strategic Planning Office	26.11.2024.	4.12.2024.
	Ministry of Internal Affairs	27.1.2025.	no reply
	Office of Prime Minister - Strategic Planning Office	27.1.2025.	28.1.2025.
	Office of Prime Minister - Strategic Planning Office	27.1.2025.	28.1.2025.
	Office of Prime Minister - Strategic Planning Office	27.1.2025.	no reply
MKD	Ministry of Public Administration	12.11.2024.	6.12.2024.
	Ministry of Finance	12.11.2024.	23.12.2024.
MNE	Ministry of Public Administration	18.10.2024.	30.10.2024.
	Ministry of Finance	18.10.2024.	25.11.2024.
SRB	Ministry of Public Administration and Local Self-Government	20.10.2024.	1.11.2024.
	Ministry of Public Administration and Local Self-Government	14.11.2025.	28.11.2024.

Interviews with key informants were conducted and used as a base for point allocation for elements 1.8 and 2.7. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored processes. Interviews with other stakeholders (such as representatives of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic – in this case, their involvement in the development process of PAR planning document (element 1.8) and their involvement in the work of PAR monitoring and coordination structures (element 2.7).

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.8 and 2.7 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with the interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table 15. Interviews with non-state actors

Administration	Date	Number of interviews
ALB	5.12.2024. (4), 11.12.2024. (2)	6
BiH	n/a	n/a
KS	27.11.2024.	5
MKD	22.11.2024. (2), 26.11.2024. (4)	6
MNE	26.11.2024.	2
SRB	14.11.2024., 21.11.2024., 25.11.2024., 27.11.2024., 28.11.2024., 29.11.2024.	6

Table 16. Interviews with other stakeholders

Administration	Date	Number of interviews
SRB	1.11.2024.	1

List of interview questions

- **Element 1.8**

1. To what extent do you agree with the following statement: **The development process of the PAR planning document was transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **The development process of the PAR planning document was inclusive.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How are civil society organisations involved in the initial stages of developing PAR planning documents?
2. How transparent are the timelines, agendas, and outcomes of consultations during the development of the PAR planning documents?
3. How are feedback and contributions from different stakeholders documented and integrated?
4. How are key decisions made throughout the development of PAR documents, and are these decisions communicated clearly to all involved parties? (for example, decisions on adopting changes proposed by the non-state actors – specific measures, activities, and such)
5. Is there an opportunity for continuous feedback throughout the process?
6. Have there been instances where stakeholder input significantly impacted the development process of the planning process? Could you provide an example?
7. During the development of the PAR planning documents, did the responsible authorities implement different forms of consultations during the process (such as focus groups, surveys, interviews, submission of written contributions, etc.). If the answer is yes, please elaborate.

- **Element 2.7**

1. To what extent do you agree with the following statement: **Materials for preparation for meetings of administrative structures are provided timely.**
 - e) fully disagree
 - f) tend to disagree
 - g) tend to agree
 - h) fully agree
2. To what extent do you agree with the following statement: **Materials for preparation for meetings of political structures are provided timely.**
 - e) fully disagree
 - f) tend to disagree
 - g) tend to agree
 - h) fully agree
3. To what extent do you agree with the following statement: **Meetings of administrative structures allow meaningful contribution.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
4. To what extent do you agree with the following statement: **Meetings of political structures allow meaningful contribution.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Do you feel that your organisation has a meaningful voice in the decision-making processes within the administrative and political structures? Please elaborate
2. Have there been instances where your organisation's input has led to changes or influenced outcomes? Please provide an example
3. How do you receive updates or feedback on how your organisation's contributions are utilised?
4. How would you assess communication within the structures and from heads of the structures in terms of effectiveness and timeliness?

5. How would you assess the transparency of the decision-making processes within the structures?
6. Do you believe that the coordination and monitoring structures could better support engagement and utilise civil society contributions? In which way
7. How would you assess the availability of information on PAR implementation and monitoring, i.e., how would you assess the online availability of relevant information?

LIST OF REFERENCED SOURCES IN THIS REPORT

Legal acts, by-laws, rules and guidelines

Administrative Code of Albania, *Official Gazette* No. 44/2015. Available at: <https://tinyurl.com/yc7zssyb>

Decisions on Establishing the Inter-Ministerial Project Group in Serbia, *Ministry of Public Administration and Local Self-Government*, September 17th, 2024. Available at: <https://tinyurl.com/3eu7v2yc>

Decision on the Form and Content of the Regulatory Impact Assessment Report of North Macedonia, *Official Gazette* No. 106/2013. Available at: <https://tinyurl.com/mrxxp7md>

Decree on the Election of Representatives of Non-governmental Organisations in the Working Bodies of State Administration Bodies and the Implementation of Public Debates in the Preparation of Laws and Strategies of Montenegro, *Official Gazette* No. 41/2018. Available at: <https://tinyurl.com/6rxz9k34>

Guidelines on the Manner of Acting within the Work of the Ministries in the Process of Performing a Regulatory Impact Assessment of North Macedonia, *Official Gazette* No. 106/2013. Available at: <https://tinyurl.com/rszvtz4>

Guidelines for Inclusion of Civil Society Organisations in Working Groups for the Development of Draft Public Policy Documents and Regulations of Serbia, *Official Gazette* No. 8/2020, 107/2021. Available at: <https://tinyurl.com/37tr2wre>

Law on Notification and Public Consultation of Albania, *Official Gazette* No. 146/2014. Available at: <https://tinyurl.com/2ee3d8wx>

Law on the Planning System of the Republic of Serbia, *Official Gazette* No. 30/2018. Available at: <https://tinyurl.com/346rkfd6>

Methodology for Regulatory Impact Assessment of North Macedonia, *Official Gazette* No. 107/2013. Available at: <https://tinyurl.com/msn8hc2y>

Order no. 3 for the Approval of the Public Consultation Process Roadmap, *General Secretary, Prime Ministry of the Republic of Albania*, January 29th, 2021

Regulation on Rules of Procedure of the Government of Republic of Kosovo, *Official Gazette* No.17/2024. Available at: <https://tinyurl.com/38mztu83>

Rules for Consultations in the Drafting of Legal Regulations of Bosnia and Herzegovina, *Official Gazette* No. 87/2023. Available at: <https://tinyurl.com/2vkpk8db>

Rules of Procedure of the Government of the Republic of North Macedonia, *Official Gazette No. 56/2021*. Available at: <https://tinyurl.com/bdf7v365>

Reports

Bajrami, Renata, and Blerina Istrefi. 2025. *PAR Monitor Report Kosovo – Strategy for PAR 2024/2025*. Available at: <https://tinyurl.com/52cct2p9>

Divljak, Milica. 2025. *PAR Monitor Report Serbia – Strategy for PAR 2024/2025*. Available at: <https://tinyurl.com/52cct2p9>

Jaćimović, Dragana, and Bojana Pravilović. 2025. *PAR Monitor Report Montenegro – Strategy for PAR 2024/2025*. Available at: <https://tinyurl.com/52cct2p9>

Karai, Julijana, and Beba Zhagar. 2025. *PAR Monitor Report North Macedonia – Strategy for PAR 2024/2025*. Available at: <https://tinyurl.com/52cct2p9>

Korçari, Iliada, and Naim Çabej. 2025. *PAR Monitor Report Albania – Strategy for PAR 2024/2025*. Available at: <https://tinyurl.com/52cct2p9>

Ćutahija, Haris. 2025. *PAR Monitor Report Bosnia and Herzegovina – Strategy for PAR 2024/2025*. Available at: <https://tinyurl.com/52cct2p9>

SIGMA/OECD. 2025. *Public Administration in Albania 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

SIGMA/OECD. 2025. *Public Administration in Bosnia and Herzegovina 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

SIGMA/OECD. 2025. *Public Administration in Kosovo 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

SIGMA/OECD. 2025. *Public Administration in Montenegro 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

SIGMA/OECD. 2025. *Public Administration in North Macedonia 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

SIGMA/OECD. 2025. *Public Administration in Serbia 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

Websites

Online Monitoring Tool for PAR of Serbia, <https://monitoring.mduls.gov.rs/>

Other

Criteria for nominating CSOs in the PAR Council of Montenegro, Government of Montenegro, July 19th, 2022, <https://tinyurl.com/yc2395dy>

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