

**Assessing the World
Bank's Pilot Program on
Enhanced Disclosure**

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Acronyms and abbreviations

CAS	Country Assistance Strategy
CPPR	Country Portfolio Performance Review
CSO	Civil society organization
ESW	Economic and Sector Work
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IDF	Institutional Development Fund
KDC	Knowledge for Development Centers
PIC	Public Information Center
NGO	Nongovernmental organization
OPCS	Operations Policy and Country Services
PID	Project Information Document
PRSC	Poverty Reduction Strategy Credit
PRSP	Poverty Reduction Strategy Paper
SEPA	Sistema de Ejecución de Planes de Adquisiciones (Argentina)
WBIEG	World Bank Institute Evaluation Group

EXECUTIVE SUMMARY

The World Bank's executive directors approved a voluntary pilot program in 2001 to increase disclosure of Bank documents and the information included in them. This report, completed by the World Bank Institute Evaluation Group at the request of the Bank's Operations Policy and Country Services, assesses the pilot program's perceived transaction costs, risks, and benefits to the Bank and borrowers; examines timeliness, comprehensiveness, and relevance of information provided; identifies risks to the integrity and impartiality of the Bank's deliberative processes; and explores additional capacity-building needs. Due to constraints of time, this study relied primarily on the opinions and perceptions of Bank staff responsible for implementing the program in a sample of countries that participated in the pilot program.

One further issue affected the evaluation. Within this report, "disclosure" refers to the *release* or provision of access to information not previously available to those outside the Bank or its clients. In contrast, "dissemination" refers to the *distribution* of information to the public or other stakeholders, such as nongovernmental organizations. Without disclosure, there can be no dissemination to the public, but disclosure is unlikely to improve transparency or accountability without a suitable means of dissemination.

The distinction – and relationship – between the two terms is important. The Bank's executive directors approved a pilot program on *disclosure*, but the Bank's implementation of the program involved attention to both disclosure and dissemination. As implemented, the pilot program sought: (a) to increase the information not previously disclosable to the public and (b) to improve the dissemination and availability of Bank-related information, including information and documents already disclosable to the public. Consequently, some country offices focused on new ways to disseminate information to the public with little or no attention to enhanced disclosure. In fact, although the pilot program was intended to disclose information not disclosable under the Bank's existing policy, few participating country offices did so, thus compromising efforts to assess the feasibility and consequences of enhanced disclosure.

Outcomes, analysis, and findings

Among the 20 country offices that participated in the pilot program, this report focuses on nine. Under the pilot program, country offices could disclose, after receiving concurrence from relevant government officials, information related to: draft Country Assistance Strategies (CAS); aide mémoires, Country Portfolio Performance Reviews; and summaries of information about forthcoming Bank-supported activities or audits of projects already being implemented. In addition, rather than engaging in project-by-project discussions about disclosure, as in all other participating countries, the Bank

supported the Government of Indonesia's desire to increase disclosure voluntarily through an "umbrella disclosure agreement" that presumed disclosure of a wide-range of documents that had previously required approval before being disclosed.

In contrast to the Bank's expectations about what would be released in terms of "newly disclosable" information, no country office in the pilot program released Bank documents, such as aide mémoires or draft CAS, that were not already disclosable. Most country offices provided summaries of these documents. In only two cases did these summaries include information that was not already available through the Bank's existing disclosure policy.

Respondents cited greater benefits than costs and no major negative consequences from disclosing the information that was disseminated, either for information disclosed or not disclosed under the existing disclosure policy. Costs generally related to the time required for country office or government partners to implement the pilot activities and to obtain government approval for release of information approved for disclosure under existing policy.

The disclosure of aide mémoires was identified as a key concern related to the integrity of the Bank's deliberative processes.¹ Country offices did not release aide mémoires or ratings of project implementation due to concerns about the need for candid discussions as well as the perceived costs of obtaining approval from governments. For country offices whose pilot activities involved development of Country Assistance Strategies, the risks cited most often were those of failing to engage civil society meaningfully with newly disclosed information. Respondents warned of ineffective engagement because many documents were available only in English, and they typically included technical jargon and did not provide summaries or interpretation.² Similarly, for country offices considering enhanced disclosure about procurement, final audits, or ongoing projects, concern was raised about providing too much detail to be comprehensible given little demand and a perception of low capacity of potential audiences to absorb and use the information.

Respondents reacted positively to increased engagement of civil society in developing strategy documents, as was occurring anyway under Bank policy during the pilot program. Respondents largely saw increased disclosure as a factor contributing to improved relations with stakeholders. These respondents also partially credited enhanced

¹ Aide mémoires provide a written record of a mission to the field. They contain key findings, identify issues requiring attention, and actions agreed, including timing and responsibility. The primary audience for these documents includes government officials associated with or responsible for a Bank-supported project or loan. According to OPCS (2007), aide mémoires are not disclosed to the public because they are part of the deliberative process with the Bank's clients. At the time of the pilot program, the Bank's disclosure policy did not provide for the disclosure to the public of aide mémoires. In 2005, as part of additional review of the Bank's policy on disclosure (World Bank 2005), the executive directors approved a proposal that permits the Bank's president to release aide mémoires on a case-by-case basis after receiving a government's consent to do so.

² Draft CAS documents were not disclosed mostly due to practical concerns about (a) overly technical and comprehensive information; (b) resource constraints; and, (c) the time required to obtain government approval.

disclosure with an increased use of the Bank as an analytical resource for domestic policymaking. Many respondents also commented that increased disclosure enhanced the development of strategy papers and the participation of civil society in Bank processes. For disclosure of additional information about ongoing projects or dissemination of information already disclosable, the data are insufficient to either confirm or generalize results. Anecdotal evidence suggests small, positive outcomes in Indonesia and the Philippines.

Respondents suggested a need to build capacity, trust, and comfort with government by incrementally increasing disclosure to assure these counterparts that disclosure is not a threat. Some respondents believed that release of additional data about ongoing projects would be a positive future step.

The evaluation further concludes that:

- Renewed attention should be given to the disclosure of aide mémoires, none of which were released as part of any pilot activities.
- Future pilot programs related to disclosure should be attentive to ways to evaluate reliably the program's outcomes. Although the description of the pilot program addressed its monitoring and evaluation (World Bank 2001), efforts to collect meaningful data during implementation were limited and unsystematic.
- The capacity of stakeholders and affected parties to absorb and make use of additional information is central to the success of any disclosure program. Disclosure of information is of little value in the face of limited ability to access and understand that information. The Bank should not assume that the release of previously undisclosed information promotes capacity, development, or even awareness.
- Increased disclosure and dissemination require consideration of the monetary and nonmonetary costs of such actions. In several of the pilot activities examined, perceived costs, even when seen as low, governed decisions about what and how much information to release and in what ways to do so.
- In addition to considering the perceived benefits of enhanced disclosure, the Bank should also consider the potential reputational risks associated with nondisclosure of information of relevance to stakeholders. Withholding information discourages transparency and can undermine claims that the Bank favors improved governance.

1 BACKGROUND ON INFORMATION DISCLOSURE

Introduction

1.1 Beginning in the 1990s, the World Bank increased transparency by expanding the availability and accessibility of what had previously been internal Bank documents and reports. In 1993, for example, the Bank became the first multilateral development bank to adopt a policy on information disclosure. Eight years later, in August 2001, the Bank's executive directors expanded the Bank's policy on disclosure and endorsed a voluntary pilot program to increase further the disclosure of information not previously available to the public.³ In particular, the pilot program was intended to test ways for the Bank and its clients to provide "enhanced information" (World Bank 2001) related to:

- CAS consultations (including items such as the Bank's existing strategy and country portfolio performance, relevant economic and sector work, and possible priority sectors)
- Projects and Poverty Reduction Strategy Credits (PRSC) under preparation (covering items like the lessons of experience, technical analyses, design alternatives, risks, and risk management as they relate to project objectives).
- Projects under implementation (including such items as annual procurement plans, audits, information based on midterm reviews, and Country Portfolio Performance Reviews).

1.2 The pilot program's goals (World Bank 2001) were to:

- a) design and test cost-effective ways to provide additional operational information to target audiences that is relevant, timely, and comprehensive in the context of Country Assistance Strategies, PRSCs, or project preparation and implementation;
- b) design and test mechanisms to protect the integrity and impartiality of the Bank's deliberative processes while providing such additional information and adhering to other constraints recognized by the current disclosure

³ In 2002, the Bank's executive directors approved additional revisions to the Bank's policy on the disclosure of information, providing for the release of additional project-related documents, disclosure of the chairman's summaries of Board discussions on CASs and sector strategy papers, and a systematic approach to accessing the Bank's historical information. Additional revisions occurring in 2005 unified the CAS disclosure policy across IDA and IBRD countries and also called for the release of CAS Public Information Notices and information related to IDA Mid-Term Reviews, procurement plans, Board Minutes, and Project Completion Notes.

- policy (that is, when the information is confidential or proprietary, when disclosure would be detrimental to the interest of the Bank or a member country, and so on);
- c) identify reputational and other risks and test approaches to manage them;
 - d) assess the near-term costs to and impact on the borrower and the Bank of providing and reaching target audiences with this additional information, and processing the feedback; and the pilot [activities] will also
 - e) assess borrowers' capacity-building needs.⁴

1.3 Due to the voluntary and decentralized implementation of the pilot projects and because country offices were invited to propose their own disclosure activities, there was no centrally coordinated effort to ensure that the individual pilots included activities that went beyond the Bank's existing disclosure policy. This is understandable because the Bank did not want to require activities in the absence of demand or interest. The program's advocates in Washington were also unable to ensure that country offices disclosed information that would address the goal of disclosing previously undisclosed information. As an illustration, most efforts focused on dissemination processes or participatory preparation of reports that had been begun before the pilot program. Few pilot projects disclosed information on implementation of ongoing projects.

1.4 Country directors were invited to participate in the pilot program. Those who volunteered to do so led the pilot activities in collaboration with their government counterparts. This collaboration involved the host government's consent for the release of previously undisclosed information. As one nongovernmental organization (Freedominfo.org 2002) suggested, the Bank hoped "to push the envelope on disclosure, but within the bounds of comfort for the participating governments."

1.5 After the country directors ascertained governments' interest in participating in the pilot program, the directors were supposed to agree with the government on operational objectives, define target audiences, select means of dissemination to "targeted in-country groups," identify and engage counterparts and strategic partners in implementation and monitoring, and define monitorable indicators (World Bank 2001).

1.6 Twenty-seven country offices and regional hubs indicated an interest in the pilot program. Of these, 20 initially chose to participate, and 15 implemented activities – 12 country offices and three multicountry pilot projects, one of which focused on disabled persons' access to information. Appendix A identifies the primary activities undertaken in the countries included in the present study, and appendix B provides an overview of all pilot activities.

1.7 The External Affairs Vice Presidency was responsible for implementing the pilot program, and OPCS was expected to monitor its implementation (World Bank 2001).

⁴ The Bank's website (see note 4) also notes that "Increasing the number and type of documents that are made publicly available needs to be complemented by efforts to better deliver the content to target audiences, especially those affected by Bank operations."

Incremental funding of up to \$75,000 was available to country offices for fiscal years 2002-03 for the pilot activities, and grants from the Institutional Development Fund (IDF) were also available for participating governments.⁵ The availability of funds for pilot activities suggests awareness that the pilot program would include attention to enhanced dissemination, which is more expensive than mere disclosure of previously unavailable information.

1.8 The Government of Indonesia received a two-year IDF grant of \$300,000 to enhance disclosure. The grant, which reflected the government's desire to combat corruption and enhance openness, covered an umbrella disclosure agreement permitting the release of midterm reviews, final audits, and previously undisclosed information on procurement for all loan and credit agreements. The agreement was intended to "include a presumption of disclosure of documents that [would otherwise] require prior approval, subject to the application of the general procedures, for removal of confidential information and for restricting the release of documents involving extensive confidentiality issues" (World Bank 2001). As a consequence, the agreement eliminated the need for the Bank's country office to discuss additional disclosure with the government on a project-by-project basis and item-by-item approach to voluntary disclosure. The provision that went beyond the Bank's disclosure policy at the time was one that required the disclosure to all bidders, after the successful bidder is notified, of the summary of the evaluation and comparison of bids, procurement offers, and quotations (World Bank 2001).

1.9 In addition to these summaries, the Government of Indonesia also intended to make available, "in a manner that is prompt, efficient and cost effective," audits, annual procurement plans and schedules, bidding documents and requests for proposals, and short lists of consultants and lists of prequalified contractors and suppliers (World Bank 2002). In Indonesia, in contrast to the other pilot countries, the government (and not the Bank) was to take the lead in making new or additional disclosures.

⁵ All country offices that requested funding had their requests approved. Country offices in Georgia, Turkey, and Zambia applied for funding, had their requests approved, and then decided not to participate in the pilot program.

2 METHODOLOGY, DATA, AND LIMITATIONS

2.1 The countries included in the present evaluation are Bolivia, Bulgaria, Brazil, Dominican Republic, Indonesia, Nicaragua, the Philippines, Tanzania, and Ukraine. In each of these countries an initial contact was available, often a country manager or director, and each provided information for the evaluation. In addition, the study also examined a related disclosure effort in Argentina, which was not affiliated with the pilot program.

2.2 WBIEG categorized each pilot project as having up to three foci: (a) general information dissemination; (b) disclosure of documents in developing strategy documents, namely a draft CAS; or, (c) provision of information about ongoing projects and programs.

2.3 WBIEG identified four primary research questions and several related indicators:

1. Were the disclosure activities relevant, timely, and sufficiently comprehensive to facilitate meaningful participation?
 - Relevant and comprehensible
 - Sufficiently early to allow participation
 - Breadth of information provided
2. What costs, risks, and benefits were there to the Bank?
 - Near-term costs including financial, time, or others
 - Reputational risks
 - Risks to integrity and impartiality of the Bank's deliberative processes
 - Problems dealing with confidentiality or proprietary information
 - Other risks
 - Positive or negative changes in attitudes or behaviors
 - Benefits
3. What costs risks, and benefits were there for country partners?
4. What additional capacity building was necessary and remains to sustain dissemination and inclusive activities?
 - Capacity building that was required and that resulted

- Additional capacity building needs of counterparts, other governmental representatives
- Additional capacity building needs of stakeholders and others.

2.4 Although these questions are easily asked, WBIEG faced a challenge in differentiating the impact of disclosure with the means of and reasons for doing so. Here it is important to distinguish between additional disclosure on the one hand and increased dissemination of already disclosable information on the other hand. As noted above, a key purpose of the pilot program was to “provide additional operational information to target audiences.” Although the intent may have been additional disclosure, the Bank’s implementation of the pilot program focused on both (a) providing information not previously disclosable; and (b) dissemination, that is, increasing access to information already disclosable but not readily available. The Bank’s presentation (World Bank 2001) about the pilot program to the executive directors emphasized the former objective as did several of the program’s declared purposes, such as testing “mechanisms to protect the integrity and impartiality of the Bank’s deliberative process” and identifying “reputational and other risks.” Likewise, the pilot program was initiated in the context of a review of the Bank’s disclosure policies (as opposed to its procedures for disseminating information), further suggesting that the pilot program’s primary objective was to assess the consequences of disclosing information not previously available to the public. Nonetheless, the Bank’s various descriptions of the pilot program offer at least some support to those who believe that the program sought to achieve either or both objectives.

2.5 Once the pilot program began, the Bank encouraged attention to both objectives. The “application” materials for funding that were distributed to the Bank’s country offices declared that the “aim of these pilots is to carefully explore and test ways of enhancing the quality and reach of the information available in borrower countries for public consultations.” As a consequence, some country offices focused on more participatory approaches for disclosing information than used previously, and funds were used for outreach, consultation, or dissemination purposes, such as translation, workshops, and creation of websites. Still other project-related funding was used for “housekeeping” functions, such as signs in Khmer for a Public Information Center (PIC) and its decoration with local handicrafts in Phnom Penh. In the Philippines, funds intended to promote increased disclosure were used to create new public information centers, an activity related to dissemination. The Philippines’ country office similarly used funding from the pilot program to bring together field practitioners from civil society to share experiences on the use of information communication technologies.

2.6 In several instances, other activities related to dissemination – but not funded through the pilot program – were also being implemented. Coincident with the pilot program, the executive directors also initiated other changes in the Bank’s disclosure policy in 2002. It is thus not possible to specify what effects occurred due solely or even primarily to the pilot disclosure program or to the amount or kind of information disclosed or the basis for its disclosure. As one review (Bank Information Center 2003) of the pilot program observed, the pilot activities were “merely testing ways for country offices and PICs to more fully comply with the requirements of the Disclosure Policy”

rather than assessing opportunities for disclosure beyond that policy. This is a fair assessment, at least according to several Bank staff involved in implementing the pilot program.

2.7 Furthermore, this study was conducted several years after completion of most of the pilot projects, not all of which ended at the same time, so data are anecdotal and from a limited number of sources.⁶ These sources largely exclude potential target audiences. Due to the difficulty of identifying appropriate comparisons, the report does not include other countries in which there were no pilot activities, thus precluding comparison with counterfactuals. Similarly, although several country offices participated in the pilot program, their activities and immediate goals were not always similar. In Bulgaria, as an example, the country office wanted to increase understanding of poverty issues and prepared short “issue briefs” on the topic. In the Dominican Republic, one goal was to increase the frequency with which its web site was accessed while the Bank offices in Nicaragua and the Philippines wanted to create new PICs. The study also lacks baseline data on the key indicators. Even when baseline surveys or focus group data for constituencies were available before or after the planned activities, the data were either inaccessible or could not be translated.

⁶ The Bank’s description (World Bank 2001) of the pilot program indicated that the World Bank Institute would evaluate the program at the end of fiscal year 2003. The evaluation did not begin in March 2007, well after all the pilot activities had been completed. WBIEG was thus not able to affect the design of the pilot program or to identify the indicators or data that would have been useful to collect during the pilot program.

3 OUTCOMES AND IMPACTS

Defining outcome indicators

3.1 Country offices did not identify reliable pre- and postintervention measures of expected outcomes, although the Bank declared that each pilot should “set clear objectives...and define monitorable indicators that would capture how the information is used, how it affects decisionmaking, and what the associated costs and benefits are” (World Bank 2001). To obtain funding to support their pilot activities, country offices were asked to identify the major outcomes that could be expected to result from the activities and to propose key performance indicators. Unfortunately, “major” outcomes were often defined in terms of activities, such as greater information dissemination and the number of meetings with stakeholders (in Bolivia) or in terms of outputs, such as the completion and updating of project brochures (in the Philippines). Country offices were also asked to indicate how they would monitor and evaluate the proposed activities, but these offices did not routinely or rigorously implement the evaluation procedures they had proposed. Given this situation, this study focuses on the pilot program’s goals, emphasizing costs and benefits to the Bank and its partners.

3.2 Qualitative indicators expected from greater inclusiveness and openness in the development of strategy papers included attitudes of civil society representatives toward the Bank, attitudes of the press and the character of articles regarding the Bank, and frequency of reference to the Bank as an analytical resource. An additional intermediate outcome indicator was changes in Bank and government practices that might improve impacts of aid-funded projects and programs. For activities emphasizing disclosure of project- and implementation-related information, indicators included involvement of or interest from noninterested parties in procurement, lower bids, quicker and more complete disbursement of funds, and enhanced implementation effectiveness.

Going beyond the disclosure policy

3.3 A key purpose of the pilot projects was to disclose documents and information in specific areas (see section 1.4 above) exceeding the Bank’s then-current disclosure policy. Under the pilot program, country offices could disclose information in several areas. Of the pilot projects examined, the country offices indicated their intent to disclose: draft Country Assistance Strategies (CAS) (three country offices); aide mémoires (four country offices); a Country Portfolio Performance Review (one country office); and summaries of information about forthcoming Bank-supported activities or audits of projects already being implemented (three country offices). Several other participating offices similarly indicated their intent to increase dissemination of information already available. Table 1 summarizes the enhanced disclosure efforts.

Table 1: Countries proposing to go beyond the Bank’s existing disclosure policy

Country	Proposed Disclosure	Actual Disclosure	Reason Provided
Bolivia	Draft CAS	Summary of draft CAS distributed in Spanish; final CAS in English and Spanish.	Summary information seen as more practical for consultations with civil society organizations (CSO) than releasing document in English or translating document.
Dominican Republic	Aide mémoires; draft CAS	Basic project information document (PID) placed on website in lieu of aide mémoires; four-page summary of draft CAS in Spanish	CSOs displayed interest only in general information about ongoing projects. Summary of draft CAS believed more effective for engaging CSOs. Aide mémoires seen as sensitive and negotiation of confidential elements could take a long time but were low priority.
Indonesia	Aide mémoires; summary of all bid evaluations	Aide mémoires not disclosed; summary of bid evaluations disclosed	Decision not to release aide mémoires came from the Bank’s headquarters due to risk perceived of loss of confidential channel for dialogue. Country office noted no indication that the government would have objected to their release.
Nicaragua	Aide mémoires	Not disclosed	Received nonobjection from Ministry of Finance but decided not to disclose for fear of losing candid dialogue.
Philippines ^a	Aide mémoires; audit/rating information	Not disclosed; project information document disclosed on website using interactive maps.	Concern within country office that disclosure of aide mémoires would be perceived as too open and too much to ask the government. Expected to receive information on what and how the Indonesian pilot disclosed audit and rating information but country office did not receive the information and did not return to the issue.
Tanzania	Country Portfolio Performance Review	Summary containing brief details of project ratings disclosed.	Determined that summary alone was sufficient to achieve objectives. Wanted to release relevant details in understandable and timely manner.
Ukraine	Draft CAS	Summary of draft CAS and sector-specific briefs disseminated.	Full document not perceived as practical for consultation purposes. Wanted succinct, nontechnical information. Time/cost of receiving government approval.

^a Considered but not a stated activity in proposal for pilot funding.

3.4 Of the seven pilot projects shown in table 1, six identified the disclosure of an otherwise undisclosed document or information as a consideration, if not an explicit objective, in the country office’s proposal for pilot funding. Of these six, none released Bank documents not already available to the public, and no aide mémoires or draft CASs were released.⁷ For several reasons, discussed below, most country offices opted to disseminate summaries of information contained in the documents initially considered for disclosure rather than the full document. In Indonesia and Tanzania, these summaries included information not previously available in documents covered by the existing disclosure policy.

⁷ A Bank report (World Bank 2004a) indicated that “some countries have disclosed all or part of the draft CAS during CAS consultations,” but the report did not provide any examples. Furthermore, a footnote for this statement referred to the earlier report describing the pilot program (World Bank 2001).

3.5 Tanzania had proposed to release the 2003 Country Portfolio Performance Review (CPPR). The country office instead decided to release a summary of its contents. While this action did not constitute the disclosure of an official document, the summary contained information that was previously unavailable to the public, including:

- A summary of the impact of completed Bank-supported projects in Tanzania by sector,
- Reasons for success or failure,
- Performance of current portfolio,
- Major implementation problems,
- Cross-cutting portfolio implementation problems, and
- Notes on actions undertaken by the government and the Bank to address these problems.

3.6 Respondents cited various reasons for not disclosing entire documents. Most often, respondents indicated that the additional transaction costs of obtaining government approval for disclosure outweighed the perceived benefits. Official documents, especially Economic and Sector Work (ESW) and other strategy papers, are written in English and often use technical jargon, so most pilot projects aimed at engaging CSOs used targeted, succinct summary documents. In addition to being more understandable, the summaries did not need official approval for release. Thus, for CAS and other strategy documents, respondents indicated that the choice not to disclose full, official Bank documents represented a practical concern about resource constraints and not necessarily a perceived risk to the Bank or country partners.

3.7 As indicated in table 1, none of the pilot projects disclosed aide mémoires. In addition to citing the cost of gaining government approval, interviewees suggested that the decision not to release aide mémoires or other detailed information on project ratings was due to a concern for the integrity of the Bank's deliberative process. In Nicaragua, despite receiving a nonobjection from the government, the country office decided to withhold disclosure of aide mémoires for fear of losing a candid channel of communication with the government. The Philippines country office noted that the decision not to disclose aide mémoires arose from a concern that government counterparts would perceive that as being too open given the atmosphere of limited openness at the time. The respondent indicated a desire in the country office for gradual progress towards disclosure that would not disrupt the relations between the Bank and its counterparts in the government. In Indonesia, respondents noted that the country office staff and government counterparts likely would have agreed to disclosure of aide mémoires. Nonetheless, a decision not to disclose them was made at the Bank's corporate level in Washington, DC.

3.8 In two of the three countries just mentioned, Bank staff censored themselves, due perhaps, to their perceptions that they faced unwinnable battles with their counterparts in government.

3.9 Although no country that participated in the pilot program publicly disclosed aide mémoires, several precedents for doing so already existed. A search of the internet using Google uncovered several of the Bank's aide mémoires, such as one from 1997 in which a Bank team reported on its visit to Korea to review the implementation of three Bank-funded projects. Other publicly available aide mémoires summarized the Bank's review of the Northern Belize Biological Corridors Project in 2000, its review of Pakistan's City Development Strategy and City Assistance Program in 2000, and a Bank mission to Madagascar in 2002 to discuss a program to control locusts. Between August 2001 and May 2004, the Bank also released five aide mémoires reporting on management missions to review construction of the controversial Nam Theun 2 dam in Laos. In doing so, however, the aide mémoires were carefully edited and cleared with the government to prevent avoidable embarrassment. As one participant observed, this led to some loss of candor "but facts were not diluted." Release of further aide mémoires ended once the Bank decided to provide funding to support the dam's construction.

Audiences targeted

3.10 Most pilot activities targeted similar constituencies, including government officials (often including parliamentarians or officials in executive agencies), other donors, nongovernmental organizations (NGOs), academics, and representatives of civil society and the private sector. Some pilot activities focused on additional constituencies important to the country's context, including social movements and indigenous groups, governors and state secretaries, youth organizations, religious leaders, and representatives of trade unions. The number of people and organizations involved in consultations about strategy documents ranged from a select group of media and NGO representatives in Tanzania to hundreds via multiple methods in some countries.

Approaches to disclosure

3.11 A pervasive pattern noticed across all pilot projects was the decision to release summary documents in lieu of full technical documents. Countries in the CAS development phase that had indicated intent to disclose the draft CAS opted for nontechnical summaries. Practical constraints governed this choice. Respondents noted that the summaries effectively served the purpose of preparing constituents for consultation meetings. In the opinion of the Bank's respondents, the summaries successfully highlighted the main points of the complete documents without burdening stakeholders with technical jargon. Also, because country assistance strategies are in English, summaries provided information in local languages and eliminated the time and expense of translation. Some country offices used pilot funds to translate and disseminate a final CAS, such as in Bolivia, but none translated a draft CAS in its entirety.

3.12 Some country offices developed websites for disclosed documents, such as in the Dominican Republic. Respondents noted that the website was frequently used as a communication tool between the country office and the national media. Other offices emphasized the role of the PIC in their enhanced disclosure efforts. Nicaragua's pilot focused heavily on the launch of the country's PIC, which served as a centralized hub for archived documents. The PIC website also incorporated an online catalogue of disclosed documents. The Bank's office in the Philippines established 10 Knowledge for Development Centers throughout the country, housed within university libraries, which continue to serve as interactive, regional PICs. Still others, such as in Indonesia, did not make special provisions for accessing the newly disclosed information, resulting in disclosure on a case-by-case basis on requests to the appropriate government ministry or implementing agency.

3.13 Some offices, such as in Bulgaria, used funds for outreach activities and to produce educational materials about the World Bank, such as brochures on "10 Things You Didn't Know about the World Bank." These activities may have been desirable, but they reflected inventive *dissemination* of already disclosed information in a new or more accessible format. Brazil and the Dominican Republic funded translation of archived project information documents (PIDs). Many pilot activities supported additional CAS consultations or seminars on completed CASs and ESW. These activities are best described as dissemination and outreach activities. Many respondents considered the efforts an essential component of much-needed capacity building for engaging country partners and other stakeholders.

3.14 In Cambodia, the Bank opted to enhance access to its operations and to increase the transparency with which it conducted its business there. Prior to the pilot, according to one participant in the process, the Bank was widely viewed as distant and disengaged from the public. The Bank's office in Phnom Penh did not have a receptionist, the Bank made little effort to engage with the public, and when they did publicize their efforts the results was typically pictures of Bank staff in suits and ties being photographed with government officials. To change this situation, the Bank quintupled the number of Cambodians working in the country office, created a website in Khmer, hosted an "information fair," and produced many publications in Khmer, including a *Cambodia Environment Monitor*.

3.15 As noted earlier, although IDF grants were potentially available to all countries participating in the disclosure pilot, only the Government of Indonesia received such a grant, which meant that far more Bank support for the pilot program was available in Indonesia than in any other country that participated in the program. To obtain this grant, the Bank's office in Jakarta crafted a proposal to assist the government "to increase disclosure by revising its disclosure policy, developing enforcement mechanisms, developing systems to implement enhanced disclosure, and developing capacity and awareness of civil society to enable external oversight" (World Bank 2002). As the proposal further noted, "there is an urgent need for capacity building of all the stakeholders to understand the implications of increased disclosure."

3.16 To address these issues, the Bank proposed a wide range of activities, including two overseas study tours for officials from the National Planning Development Agency (Bappenas), workshops to increase awareness of disclosure, creation of a plan to enhance the capacity of civil society groups to understand their rights and to use the disclosed information to promote effective oversight, the preparation of a presidential decree on disclosure, and creation of a management information system (thus requiring the purchase of computers, printers, photocopiers, and facsimile machines).

3.17 Although Bappenas had requested the IDG grant, the proposed activities and objectives were seemingly too ambitious for the government. The Bank approved the grant proposal in February 2003, and the funds were made available to the Indonesians the following month. Despite their availability, no funds were used until June 2004, six months before the original, scheduled end of the grant. Likewise, no funds were used in the second half of 2004 (National Planning Development Agency 2006). In April 2006, the government requested an extension of the grant, but the Bank was unable to provide an extension due to the IDF's three-year limit. When the grant ended in May 2006, less than half of the funds had been used, and several of the key objectives, such as development of an institutional framework for disclosure, had not been achieved. Several workshops had been presented, but their long-term impact remains uncertain

3.18 The timing of disclosure also varied. For strategy documents in progress, some country offices provided summaries early in the consultation process. Many respondents considered this an important factor contributing to successful participation by civil society and other constituents. Ukraine's country office focused its pilot on CAS preparations and consultations and organized its activities approximately six months before the release of the final CAS. In addition to encouraging participatory development of the CAS, the country office indicated its intent to disclose draft CAS documents. Brazil's country office also focused efforts on CAS consultation but allowed about one month between consultations and the final release. Some consultation efforts were participatory, involving planning sessions and breakout groups, while others were conducted as presentations, with little opportunity for participation.

3.19 Information about ongoing projects was summarized in every case. Country offices in the Philippines and the Dominican Republic developed websites where visitors could access information on projects, including the implementing agency, the names and contact information for task team leaders, all related documents including project implementation and project completion reports, and funding amounts. No project appraisal information was included in either case. The Philippines' country office had considered that option but rejected it due to the cost of obtaining government approval and the lack of a policy framework or precedent for disclosing rating information. The Philippines' country office created a booklet with basic project information and government contacts, highlighting opportunities for NGO's involvement. As part of its dissemination efforts, the Philippines office created an Interactive Project Map, an online mapping tool where visitors could find information on all projects underway countrywide. The Interactive Project Map also provided overview statistics on poverty and other development indicators by region. The map was difficult to maintain given limited financial and personnel resources and is under review for simplification.

3.20 Recently, and independently from the pilot program, Argentina’s country office has made available data on project implementation already disclosable under current policy. The office has done so with an integrated map and searchable database. The information is uploaded automatically as part of a management information system.

3.21 The Bank’s team in Argentina noted that although the data are already disclosed under current policy, in practice, the data are challenging to obtain and in disparate locations. Further, a survey indicated that public demand for detailed project information is low and must be generated by educating civil society about the data’s value and utility. This assessment mirrors the views of some respondents, who indicated that civil society is not ready to use additional information appropriately. The Bank’s team in Argentina noted its priority for enhancing the accessibility of currently disclosed data before considering the dissemination of additional information.

Overview of baseline and pre- and postintervention measurement

3.22 Most respondents described a baseline condition of suspicion among civil society and other stakeholders because of the perceived secrecy of the Bank’s processes. In Brazil, Bulgaria, Cambodia, and Ukraine, according to several Bank staff, the Bank was viewed as an opaque institution with dubious objectives. Many respondents also noted a lack of public understanding about the Bank’s role in development and policymaking. These conditions were revealed through constituency surveys as part of CAS consultations, negative reports in the media, and interactions with different constituencies.

3.23 The baseline conditions described by respondents also revealed a desire among CSOs in several pilot countries for more information on projects. In some cases, such as the Philippines, a survey predating the pilot project indicated that the capacity and knowledge of civil society was too low for NGOs to have even rudimentary information on projects or to engage in project monitoring. Representatives of the media also frequently showed a limited understanding of the Bank and its processes and, according to respondents, often misinterpreted the findings of its analytical work.

3.24 It was difficult to establish pre- and postintervention measures, and Brazil provides an example. The country office was subject to many negative reports in the Brazilian press regarding the “secrecy” surrounding development of the CAS. Although client surveys and focus groups conducted as part of the CAS development process in 2002 occurred after the release of the CAS Progress Report, responses continued to be “contaminated” by negative attitudes about the Bank and the surveys were discontinued. Establishing comparable postintervention measures in Brazil was also difficult. The only surveys available after the disclosure activities did not include compatible respondent

groups.⁸ WBIEG was also unable to verify claimed improvements in Brazil or other countries through surveys of external organizations.⁹

3.25 The study thus relied on the impressions of respondents, who indicated their sense from anecdotal evidence of improvement in relations following the new activities and a changed approach both as part of and in addition to pilot projects.¹⁰ Similarly, the comparison between pre- and postdisclosure processes was complicated in Brazil, as in Bolivia, due to considerable changes in the political environment in a less favorable direction for partnership with the Bank.

3.26 No other respondents from countries included in the sample discussed surveys after the development of strategy documents such as CASs. They generally did characterize their interactions after the increased or improved disclosure, however, in ways that suggest improvement. See Appendix C, country summaries, for greater detail.

Overview of outcomes

3.27 The absence of suitable baseline data combined with the length of time between the pilot activities and data collection required WBIEG to rely primarily on anecdotal evidence and the memories of Bank staff for this evaluation. This situation impaired the ability to establish sound linkages between pilot activities and attribution of consequences. As noted earlier, the pilot activities also occurred during a period of complementary interventions. These including formal revisions in the Bank's disclosure policy, which were separate from the pilot programs, as well as efforts to increase the number and enhance the effectiveness of PICs. These factors should be kept in mind when considering the outcomes of the pilot activities.

3.28 In countries for which activities involved development of a CAS, all respondents reported that the consultations related to the pilot activities resulted in positive results in terms of improvements to the CAS and in the Bank's in-country relations.

3.29 Positive outcomes were noted as well for pilot activities that included project- and implementation-focused activities. In the Philippines, for example, respondents declared that the country office received more feedback and inquiries regarding ongoing projects from CSOs. The respondent provided anecdotal evidence that more of the government's projects include involvement of NGOs in 2007 relative to six or seven years ago. Further, a respondent noted a gradual increase in the government's willingness to allow NGOs to

⁸ A small survey of clients conducted in 2006 did not focus exclusively on respondents from civil society. Accordingly, the results of the full survey would not provide a good comparison to the "baseline" measure of attitudes. In addition, the data were not available to the study team in time for the report.

⁹ Further, the need to ask respondents for contacts allows for selection bias since stakeholders or media sources that respondents identify will be those mostly likely to agree with their viewpoints.

¹⁰ Two of the three respondents reported that the pilot disclosure and inclusion processes built a "tremendous amount of social capital" or represented a "major landmark" in the Bank's relationships with local NGOs. A third respondent agreed that there were "considerable difference(s)" after a series of consultations with translated materials and stated that the reasons were multifaceted and included outreach efforts of various kinds not paid for under the pilot program specifically.

monitor project implementation. The respondent was unwilling to attribute these changes to a single cause or primarily to the pilot activities but noted that the positive changes in relations with stakeholders were due largely to a more general trend toward outreach and transparency throughout the Bank and in the country office.

3.30 In two countries developing strategy documents, additional consultations resulted in changes in Bank and government practices to assure inclusion of viewpoints of various stakeholder groups and attention to impacts on those groups. An example includes the decision by the Bank's office in Brazil to sharpen the focus of impact analyses on youth in all proposed Bank projects. No respondents linked pilot activities with strongly negative outcomes. Negative outcomes included occasional unfavorable articles in local newspapers, although at a lower rate than prior to dissemination and sometimes with more informed criticisms.

3.31 Some respondents cited causal reasons for changes in outcomes, again, based on the bundle of disclosure activities or enhanced Bank-wide disclosure initiatives rather than isolated pilot-funded activities. One respondent involved with a pilot focusing on strategy documents stated that the primary causes for changes include: (a) creating opportunities for stakeholders to share their views and concerns; (b) ongoing dialogue; and, (c) incorporating concerns of stakeholders and providing feedback on related changes in strategy.

4 ANALYSIS OF KEY QUESTIONS

Analysis of pilot activities going beyond the disclosure policy

4.1 Respondents suggested that tradeoffs exist between the comprehensiveness and usefulness of disclosure, at least in the early stages of engagement with civil society. Respondents consistently indicated their beliefs that it is preferable to precede consultations about CAS with a moderate amount of tailored preparatory information, translated into local languages, rather than disclosing entire draft strategies. The primary reason cited was to provide technical information in an accessible manner that facilitated public input. For this and other reasons, namely the time of obtaining approval and the lack of precedent or formal guidelines, no country office released a draft CAS.

4.2 Respondents whose pilot projects involved disclosure of information about ongoing projects suggested a similar tradeoff between comprehensiveness and usefulness of disclosure activities given existing capacity. Some respondents perceived comprehensive disclosure to be less important than providing clear and concise data for stakeholders assumed to have low capacity to use the information. Tanzania's country office planned to disclose information on project audits and performance ratings by releasing the CPPR. Due to resource constraints and a sudden shift in priority, the CPPR was not disclosed.¹¹ A respondent reported a belief that a summary of the information would be more useful to the intended audience and less burdensome to release. As a consequence, the country office opted to release only a summary of the CPPR.

4.3 Some respondents suggested the potential utility of allowing governmental partners to become comfortable with the dissemination of data as a first step before releasing additional information. Indeed, some suggested that providing information outside of that allowed under the current disclosure policy could or should be considered as a logical next step.

4.4 Respondents cited greater benefits than costs and few mentioned costs that would be considered large in a nonfinancial sense. Respondents indicated concern about disclosing aide mémoires for fear of compromising the impartiality of the Bank's deliberative processes. Respondents also noted concern for eliminating a channel for candid dialogue between the Bank and governmental partners. Respondents from the country office in Nicaragua cited these reasons for deciding not to disclose aide mémoires. As noted in table 1, a decision was also made not to release aide mémoires in Indonesia.

4.5 The Bank's office in the Dominican Republic had also considered disclosure of aide mémoires, but concluded that the time involved with negotiating the details of the

¹¹ The country office staff was tasked to focus on the completion of joint UN strategy documents.

release in the absence of a clear precedent was not worth the potential gains. Country office staff considered that the time required for government counterparts to clear the disclosure would risk interfering in clearance of documents of higher priority. Disclosure was thus not pursued.

4.6 In Indonesia, where summaries of procurement bids were disclosed, government officials were leading the efforts to disclose information and create “disclosure fever.” Respondents indicated their belief that the benefits outweighed the costs of release, which included transaction and time costs of the new processes. One respondent labeled the risks for the Bank and country partners as “negligible,” and another noted that projects were moving beyond the agreement in releasing additional information without contention. Respondents indicated they did not perceive significant risks for country partners and greater net benefits than costs with anecdotal evidence of the beginning stages of improvements.

4.7 The tangible impacts of enhanced disclosure in Indonesia are just beginning, but they may be mitigated somewhat by issues of access. An apparent short-term impact of the disclosure of information on bids has been increased competition in procurement in some cases. More bidders submit proposals than previously, and bids sometimes are received at substantially lower rates, as low as 50 to 60 percent of specified ceilings. Previous to the bid disclosure, most bids received were 95 to 99 percent of ceilings. WBIEG was unable to confirm these reports, and the respondents also noted they could not attribute these observed changes solely to the pilot activities. The impact of the change in policy may be muted due to the public’s lack of knowledge about how to obtain and use the documents. Users must request documents from the implementing agency or relevant government office and cannot access them from a single location. WBIEG could not ascertain how often the information is accessed, by whom, or for what purposes. Respondents also indicated that it is challenging to get members of civil society to attend bidder sessions for projects consistently, as intended originally. This again suggests a need to build capacity and awareness among civil society to generate demand for disclosure.

Relevance, timeliness, and comprehensiveness of information disclosure activities

Development of strategy documents

4.8 As noted above, there may be tradeoffs between comprehensiveness and usefulness of disclosure. A moderate amount of tailored preparatory information may be preferable to widespread disclosure of complete draft strategy papers. This response appeared consistent regardless of whether respondents claimed to be skeptical or supportive of the pilot activities.

4.9 Respondents justified the decision to release summaries rather than complete documents by noting the difficulty for representatives of civil society to provide meaningful input on cumbersome, technical documents. Most noted that the pilot activities marked the first time that strategy documents or information on strategy development were widely available. Additionally, some people noted that the pilot activities marked the first time that stakeholders outside of government were included in

strategy discussions. Some respondents emphasized that misunderstanding complete documents could be particularly problematic with respect to the media, leading to the potential for articles making incorrect inferences about the Bank’s position.

4.10 These comments do not necessarily suggest that respondents favored limited disclosure. A Bank respondent from Brazil noted that the disclosure of documents for development of strategy papers, although simplified, should remain as comprehensive as possible because “the news is what you don’t say.” Another problem cited with releasing draft CAS documents is that they are in English. The release of the English-language CAS was not seen as an effective way to engage civil society productively in any pilot country surveyed, but it also raises the question of whether English-language country assistance strategies meet the needs of government officials expected to review and approve the strategies.

4.11 This was the first or second time for wide public consultations for most of the countries involved, so the evidence cannot speak to the impact of releasing additional information as stakeholders become better equipped to participate in discussion about the Bank’s activities. Some respondents suggested, however, the gradual release of additional information was considered or planned initially under their pilot projects.

Ongoing projects

4.12 Respondents whose pilot projects involved disclosure of information about ongoing projects suggested a similar tradeoff between comprehensiveness and usefulness of disclosure due to existing in-country capacity at the time of the pilot program. Bank respondents perceived comprehensiveness to be useful but not as important as providing the data in an understandable and usable fashion. Thus, at least when capacity is low, tailoring information to assure efficacy may be more important than disclosing entire documents, if constraints do not allow for both. The respondents also suggested the desirability of allowing government partners to become comfortable with the increased availability and dissemination of information before seeking additional disclosure.

4.13 The pilot included too few countries and too little information from respondents to draw inference regarding the appropriateness of timing of disclosure for ongoing projects.¹² Respondents did suggest that capacity of both government and civil society must be built and demand created for information before an issue such as optimal timing on disclosure of the information becomes pressing. This statement leaves unresolved whose responsibility it is to develop such capacity and how it can be developed.

¹² Information on this issue was not pursued as directly as with activities involving development of strategy documents because WBIEG considered that timing was a less central issue with ongoing projects, which involve longer time frames than development of documents.

Risks, costs, and benefits to Bank

4.14 All respondents cited more benefits than costs and limited risks.¹³ This was not unexpected. The risks taken were typically low and seemingly taken after a prospective judgment about the likely benefits. As an illustration, several respondents identified high potential risks associated with the release of aide mémoires, but none were released as part of the pilot, presumably because the perceived costs exceeded the possible benefits. Nonetheless, responses to a question about the net costs and benefits were similar even for those citing the most serious risks and costs and across activities emphasizing disclosure of information about ongoing projects or of developing strategy documents. Nonetheless, responses to a question about net costs and benefits were similar even for those citing the most serious risks and costs and across activities emphasizing disclosure of information about ongoing projects or of developing strategy documents.

4.15 The potential risks associated with disclosing documents without accessible summaries or without building capacity for interpreting the documents was cited most often among risks related to draft strategy disclosure. Respondents felt that nonfacilitated disclosure risked overwhelming stakeholders and reduced the likelihood of productive feedback. Other respondents indicated that providing too much information can also result in NGOs or the media interpreting the information incorrectly or making incorrect inferences about the Bank's positions. Those citing the risk of incorrect or hostile interpretations of data all discussed similar remedies including translating documents, simplifying and providing the information in a "friendly" way that avoids Bank jargon, providing summaries of the Bank's positions beforehand so incorrect inferences cannot be made, and organizing consultation sessions with media. This is the only risk identified that could be linked with disclosure of information not allowed under the existing Bank disclosure policy, although even in this case, the central concern was about dissemination.

4.16 One respondent, referring to the breadth of consultations rather than the provision of information, indicated a risk of Bank staff believing that there are multiple noninstitutional interlocutors, when "in reality [the Bank is] accountable only to the government." Similarly, it was noted that when citizens have few other forums to express their opinions on policy, consultations can lead to unrealistic expectations. Some respondents spoke of risks in challenging political environments. One respondent noted that if the public perception of the government is negative, holding public consultations as a partner with the government can negatively affect the Bank's image as a positive agent for development.

¹³ One respondent, when asked about the potential risk from disclosure related to development of strategy papers, stated "We have not lost a single dollar of business from this risk." As mentioned previously, a respondent involved in the Indonesia project called the risks from disclosure of additional information "negligible."

4.17 Few respondents mentioned costs that would be considered large in a nonfinancial sense. Costs cited included staff time and money.¹⁴ The respondents did not indicate that the activities undertaken in their countries resulted in other serious risks or costs to the Bank.

4.18 Respondents noted several benefits for the Bank from wide consultations and disclosure. These include:

- “Demystifying” the Bank and decreasing the perception that the Bank has a hidden agenda;
- Improving relationships with CSOs and other stakeholders, which begin to see Bank as a partner or stakeholder with common goals;
- Increasing legitimacy as an analytical resource;
- Enhancing the credibility of the Bank’s strategy in the face of potential changes in the government; and,
- Better equipping government officials and CSOs to engage productively with the Bank.

4.19 A respondent from the country office in Kiev noted that in postcommunist countries in which there has been confusion and skepticism about the Bank and its reports, outreach activities with the launch of new ESW are “absolutely necessary” to increase understanding both of and for clients regardless of whether they provide feedback directly to reports.

Risks, costs, and benefits to country partners

4.20 Bank staff suggested higher net benefits than costs for country partners and limited risks, with time constituting the majority of the costs. Respondents considered this cost to country partners to be acceptable when weighted against the benefits gained. The cost associated with personnel time for inputting information about ongoing projects into a central database was a theme in both Indonesia and the Philippines and remains a challenge in both countries. The recent experience of Argentina’s Sistema de Ejecución de Planes de Adquisiciones (SEPA) may be useful insight and is discussed below. The personnel and time costs associated with planning and implementing consultations are perceived as high, yet all respondents noted they were both productive in terms of improved product as well as increased capacity of government counterparts.

4.21 The key risks mentioned include awareness within the Bank of political cycles and other concerns related to the timing of disclosure and its potential effects. Another concern in disclosing aide mémoires, discussed previously, includes the risk that country

¹⁴ Interestingly, in the Philippines, the one country whose pilot project-funded activities were deemed too time consuming and expensive to continue as planned, the costs were described as being considerably smaller than the benefits.

offices would be less likely to be candid in their assessments, which would reduce the value of this information for country counterparts. Few respondents had direct experience or knowledge of risks from the idea of using civil society or other stakeholders to monitor procurement and ongoing projects, although none perceived that there were risks to the borrower in doing so.¹⁵ One respondent for the Indonesian activities called the risks to country partners “negligible” and another noted that the projects themselves are voluntarily beginning to provide information beyond that required under the umbrella agreement, implying a low perception of risks for the Bank.

Capacity-building

4.22 WBIEG identified four issues regarding capacity building that arose during the interviews.¹⁶ Key drivers of sustainability of the dissemination of new or previously undisclosed information were discussed by respondents. These include:

1. Allowing government officials to adjust to the benefits (or harmlessness) of wide dissemination of information;
2. Making information provision part of standard operating procedures;
3. Generating demand among stakeholders for information about ongoing projects; and,
4. Maintaining continuity of focus and the involvement of Bank staff in consultation processes.

4.23 The first point above, as noted by several respondents, suggests a need to allow government officials to adjust to greater openness and participation by stakeholders as first steps before increasing the amount of information released or taking further steps to widen dissemination of information. Respondents indicated that in some cases governmental representatives were not trying to hide information and were unaware of the benefit of disclosing and disseminating information.

4.24 Continuity of operations is eased when dissemination or feedback from stakeholders becomes part of standard operating procedures. To facilitate this, it is better for governments to establish their own disclosure policies rather than complying with various donors’ policies in a piecemeal manner.

4.25 Some respondents noted, however, that their client surveys indicated a lack of demand for information about ongoing projects. Additional capacity, which will drive a

¹⁵ This experience did not involve activities related to the pilot program.

¹⁶ This count excludes issues of political instability or unsupportive political climates in country in which a high level of continuous cooperation, necessary for activities such as drafting CASs, is not possible.

continuation of disclosure and might catalyze further demand for disclosure, must be developed to generate this demand among civil society, the media, and other users, at least in the opinion of some respondents.

4.26 Changes in donors and governments' priorities and changes in Bank staff can impede enhanced disclosure efforts. This was true in Tanzania, where the government and donors shifted their focus to joint development of the CAS and away from the 2005 CPPR. Changes in staff compounded this distraction, so that there was little institutional memory of the initial pilot project to engage stakeholders in development of the CPPR. Discontinuities in staffing also affected efforts in Brazil, where new staff altered the pilot program's priorities.

4.27 Another recurring theme is the need to streamline the process of disclosure so that the costs of providing additional information are mitigated and shared between donors and governments. An example is the difficulty faced by the Philippines' Interactive Project Map, which was maintained by country office staff until personnel costs and other complications caused the project to be put on hold. Argentina's SEPA, in contrast, is designed so that information is automatically pulled from standard Bank auditing forms that project implementation units complete. To date, about half of the information on existing or previous projects is included. In the future, projects will report all information within SEPA thus limiting the time lag for disclosure

4.28 Some respondents also indicated a need for capacity building among Bank staff to learn to communicate with counterparts and stakeholders in plain language. This theme is supported indirectly by comments from many other respondents that Bank jargon impedes engagement.

4.29 The high cost of translating long, technical Bank documents can similarly affect the sustainability of enhanced disclosure efforts. The cost of translation is a reason that some country offices prefer to disseminate summary documents, which are not as expensive to translate into one or more local languages. The costs of translation are an issue that should be considered should the Bank decide to increase its disclosure of documents. As this report has suggested, additional disclosure of documents – in English – is of little value in countries where most of the targeted audiences lack proficiency in English. The Bank's ultimate goal is not increased disclosure, but rather disclosure that increases transparency and accountability and that promotes stakeholders' participation and understanding of what the Bank is doing and why.

5 CONCLUSIONS

5.1 This analysis suggests several lessons. Few country offices pushed the boundaries of the Bank's existing policy on disclosure, although several increased their efforts to improve dissemination. The main reasons cited by respondents included time and resource constraints that created a disincentive to seek government approval. Respondents also noted uncertainty about possible negative consequences of disclosing additional information about ongoing projects. Respondents observed a perceived risk to the Bank's deliberative processes and candid communication with government partners. In Indonesia, where it seemed government approval for disclosure of aide mémoires was likely, staff at the Bank's headquarters discouraged disclosure. The overall experience suggests that to achieve additional disclosure of audit and financial information, country offices will need support from headquarters. For country office staff to feel secure in pursuing additional disclosure, a formal protocol and support system should be in place, unlike the situation during the pilot program. This is especially true in the early stages of increased disclosure, when Bank staff lack the benefit of prior lessons learned and when no framework for best practices exists.

5.2 Respondents cited greater benefits than costs for increased disclosure. Costs cited generally related to the time associated with obtaining government approval. Staff noted one primary risk and no major negative consequences, either for information allowed or not allowed currently under the Bank's existing disclosure policy. The greatest risks for pilot activities involving disclosure about *ongoing projects* were associated with the release of aide mémoires.

5.3 Should the Bank revise its policies on disclosure, attention should be given to the desired fate of aide mémoires. They are among the more important documents that discuss ongoing projects, and such projects may be of most interest to nongovernmental stakeholders. The pilot program authorized disclosure of aide mémoires, and several country offices indicated their intent to make them available to groups other than the primary audience. In contrast, of the country offices that proposed disclosure of aide mémoires (see table 1), none did so. The result was that the Bank was unable to test means to protect the integrity of its deliberative processes while providing additional information, which was a primary objective of the pilot program. Of the country offices that initially proposed the disclosure of aide mémoires, all had similar reasons for their decisions. The offices expressed concern about jeopardizing effective dialogue with the government officials responsible for the Bank-funded projects. In the context of transparency and accountability, the Bank may wish to consider the contrary risk to its reputation when it does not disclose aide mémoires.

5.4 Respondents reacted positively to engagement of civil society in developing strategy documents, as was occurring anyway under Bank policy during the pilot

program. Overall, respondents judged efforts to listen to a wide array of stakeholders and disseminate information as improving relations, increasing use of the Bank as an analytical resource, and improving the development of strategy documents in terms of engagement and attention to impacts on included groups. For disclosure of additional information about ongoing projects or wider dissemination of information already disclosable, anecdotal evidence suggests the beginning of small positive intermediate-level impacts from enhanced dissemination in Indonesia and the Philippines, although the data are insufficient to either confirm or generalize broadly regarding this issue.

5.5 The cases suggest that making disclosure the default standard operating procedure increases accessibility to information. With this approach, the fundamental assumption is that information about Bank-funded projects is disclosable, with the exception of information reasonably deemed to be confidential, proprietary, or that would compromise a government's social, economic, or political stability. The burden of proof would be on those who oppose disclosure.

5.6 Making information available only in response to ad hoc requests instead of at a central location or website can thwart efforts to increase the benefits of disclosure. Similarly, requiring Bank offices to obtain government approval for the disclosure of documents is likely to discourage country offices from seeking such approval. Given the Bank's interest in better governance and anticorruption, information can also be seen as a tool to address these issues. Indeed, as the Bank itself recognizes (World Bank 2005), information disclosure "is a key pillar of countries' efforts to improve governance."

5.7 Although the pilot activities provided some important information for analysis, the Bank may wish to consider alternative approaches to implementing pilot programs that emphasize a research-based approach to allow key questions to be addressed systematically. For example, the small number of pilot projects limited WBIEG's ability to address key issues. Likewise, the study had to rely on impressions and anecdotal evidence because no baseline information existed, and country-based reports about progress and accomplishments were either absent or of mixed quality. For future efforts, the Bank should incorporate provisions for evaluation in the design phase of the initiative. This might include the specification of criteria and guidelines for participation to improve the likelihood that information of greatest interest will be generated as well as measurable indicators that can be used to monitor progress and accomplishments. Future efforts should also require participants to provide information on the conditions before implementation or change in policy as well as the conditions expected to change as a result of their pilot activities, thus permitting comparison of actual versus intended outcomes. This would increase the data's reliability and usefulness while clarifying the lessons learned.

5.8 More generally, the report also suggests other findings and issues to be addressed. First, for example, many respondents noted their perception that target audiences do not have the capacity to assess, analyze, or otherwise comprehend the contents and purposes of many Bank documents. This perception places the onus on the target audience to change and to gain the competence necessary to understand the Bank's reports and

analyses but leaves unresolved how this capacity can be developed or who will be responsible for doing so.

5.9 A contrary view argues that it is the Bank's obligation to produce documents readily accessible to stakeholders, especially if they are the presumed beneficiaries of the Bank's interventions. This view further suggests that if stakeholders cannot understand the jargon in Bank documents, then Bank staff are responsible for eliminating the jargon. If documents in English are of little use to presumed beneficiaries, then the Bank should make the documents available in language that can be understood. Summaries of the Bank's reports and documents may be well intentioned, but the perceived consequences of intentionally withholding information or limiting access to it should also be considered. While the Bank's motives may be pure, the Bank is unlikely to be able to control the beliefs and perceptions of those concerned about selective disclosure of incomplete information.

5.10 Second, claims about low capacity presume that the Bank is best qualified to judge what data or information to disclose as well as their format. Such judgments might be seen as an effort to limit transparency. In addition, selective release of information can discourage awareness of the Bank's objectives and promote suspicion about its motives when what is released to the public is considerably different in length and content than what is given to the government. A possible solution is for country offices to provide highly accessible summary documents but also to make clear that further and more detailed information can be provided upon request, perhaps through presentations or question-and-answer sessions.

5.11 Third, perceptions of cost seem to drive many decisions about what to disclose and how to do so. Costs cannot be ignored, but the Bank may wish to consider the relative importance of disclosure (as well as its ultimate goals). By way of comparison, the Bank's operational policy on the protection of natural habitats prohibits Bank support for projects that would lead to significant loss or degradation of any critical natural habitat. Implementation of this policy does not include a consideration of costs – the affected habitat must be protected regardless of cost.

5.12 This illustration does not mean that the Bank should be unmindful of the costs of increased disclosure. To the contrary, the Bank should consider the cost of whatever disclosure policy it wants to apply and then ensure that sufficient funds are available to avoid an unfunded mandate and the policy's effective and meaningful implementation. With the pilot activities discussed in this report, the funds provided for implementation were implicitly insufficient in several countries as evidenced by cost-based considerations about what to disclose and subsequent decisions not to disclose as much as had been proposed.¹⁷ Effective disclosure and achievement of its ultimate goals imply accessibility. Without ensuring suitable access, disclosure is largely meaningless.

¹⁷ A contrary view is that the funds were sufficient for enhanced disclosure but may have been insufficient for activities directed at enhanced dissemination.

5.13 Fourth, if the Bank considers additional pilot programs involving disclosure, a distinction should be made between the provision of additional information and innovative approaches to the dissemination of information already available. As one respondent suggested, the pilot program “may have been trying to manufacture the need for increased disclosure.” Without a real need on the part of the Bank and the governments involved, the argument for increased disclosure was difficult to uphold. This conclusion suggests that the release of information is especially important when it can or will have an impact, such as with high-profile projects or with reforms designed to increase transparency and good governance. In such projects, the absence of credible information often fuels and sustains controversy. As already noted, however, several of the pilot activities involved dissemination, creation of new PICs or enhancement of existing ones, and translation of materials into languages other than English. However desirable these activities may be, they did not disclose additional operational information, which was the primary purpose of the pilot program.

5.14 Increased dissemination of existing information in new formats is clearly desirable. Nonetheless, this point underscores the recognition that efforts to increase disclosure need simultaneously to consider how “new” information will be made available to its intended beneficiaries and stakeholders. The fact that many country offices were devising “new” approaches to information that had been disclosable for many years suggests either a prior lack of attention to effective dissemination within the Bank, insufficient resources to facilitate disclosure, or both.

5.15 Finally, it is clear that perceptions of the Bank are linked closely to the level of disclosure. To the extent that anecdotal baseline data were available, stakeholders in several countries displayed concern about the Bank’s motives and harbored doubts about its intentions, at least according to Bank respondents in several countries. Coincident with the Bank’s efforts to increase disclosure, however, this suspicion seemed to decline.

APPENDIX A: PRIMARY ACTIVITIES IN SELECTED PARTICIPATING COUNTRIES

Country	Focus of pilot activities	Proposed activity of interest
Bolivia	Strategic development	Disclose draft CAS
Bulgaria	Dissemination	Poverty assessment “road shows”
Brazil	Strategic development, dissemination/access	Survey of civil society organizations’ engagement, CAS development, translation of documents
Dominican Republic	Strategic development, ongoing projects	Disclose aide mémoires and draft CAS
Indonesia	Ongoing projects, procurement	Umbrella disclosure initiative – procurement and audit disclosure, aide mémoires
Nicaragua	Ongoing projects, capacity building, access	Disclose aide mémoires; translation of CAS; workshops with CSOs.
Philippines	Ongoing projects, dissemination/access	Disclose aide mémoires and audit/rating information
Tanzania	Ongoing projects	Disclose Country Portfolio Performance Review and audit/rating information
Ukraine	Strategic development	Disclose draft CAS

APPENDIX B: OVERVIEW OF PILOT ACTIVITIES

Country/HUB	CAS-related activity	PRSP related activity	PRSC related activity	Project under preparation	Project under implementation	Customized/summary documents	Consultation with additional stakeholders	Translations of customized background documents	Special communication tools/methods	Outreach/dissemination strategy	Expected completion date	Approved funds
Armenia		√				√					June 2003	\$75,000
Bolivia	√	√	√			√	√	√	√	√	Dec 2003	\$75,000
Brazil						√	√	√	√	√	June 2003	\$75,000
Bulgaria	√			√	√	√	√	√	√	√	June 2003	\$75,000
Access to Information for Disabled People (12 countries and Washington)											June 2004	\$280,000
Dominican Republic	√				√	√		√	√	√	Nov 2003	\$75,000
East Asia Hub (Cambodia, Indonesia, Laos, Malaysia, Thailand)							√	√	√	√	Jun-03	\$75,000
Indonesia (IDF grant)				√	√							\$300,000
Lithuania	√			√							Jun-03	\$25,000
Mexico	√				√	√		√	√	√	Jun-03	\$75,000
Mozambique						√	√	√	√	√	Nov 2003	\$75,000
Nicaragua	√				√	√		√	√	√	Dec 2003	\$75,000
Philippines					√	√		√		√	Dec 2003	\$75,000
Tanzania					√	√	√	√		√	July 2005	\$75,000
Ukraine	√					√	√	√	√		Apr 2003	\$75,000
Yemen						√		√	√	√	Dec 2003	\$75,000
Zambia - CANCELLED	√					√	√	√	√	√	April 2004	\$70,000
TOTALS	8	2	1	3	7	13	8	13	11	12		\$1,650,000

APPENDIX C: COUNTRY SUMMARIES

BOLIVIA

Background to pilot

Baseline country conditions

A survey reflected a perception that the Bank was closed and focused on an agenda that was not that of Bolivians.

Stated goals

- An improved and more representative final CAS;
- Greater transparency and improved Bank support for government's disclosure;
- Improved relations with the public.

Main activities undertaken

- Widen network of stakeholders in consultations for draft CAS;
- Translation of CAS and other documents into Spanish and four indigenous languages;
- Stakeholder consultations on the CAS;
- Baseline survey of stakeholder needs and opinions.

Audiences targeted, reached

Project targeted general public, government officials, social movements, NGOs, academics, and indigenous groups. Social movements and indigenous groups are an important, powerful constituency that was a particular focus of the pilot.

Key observations by evaluative goal or indicator

Outcomes

CAS stakeholder consultations included events in several cities in different regions. Distributed materials including packet with one-page summaries of ongoing projects.

Relevance, timeliness, and comprehensiveness of disclosure activities

Consultations and distribution of materials occurred in several regions of the country and in enough time to impact 2003 CAS. Change in government in the midst of deliberations complicated the timeline of the CAS.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

Difficult to do pre-post comparison because of turbulent social and political climate in recent years.

Costs and risks to Bank

In a volatile political environment, there are dangers involved with disclosure and public outreach. Sometimes best to keep a low profile (e.g., country office discontinued radio ads for the PIC when rising hostility towards Bank became apparent).

Consultations sometimes lead general public to have unrealistic expectations of the Bank, especially in an environment where citizens are not given many forums to express opinions on policy.

If there is a poor public perception of the government, the Bank may risk its image in public consultations when it is seen as a partner of the government.

Costs to counterparts and government partners

None reported.

Benefits

Respondent believes the benefits of openness and disclosure outweigh all the costs.

Sustainability

CAS was published in Spanish for the first time. Now it is a given that it will be translated.

Additional capacity-building needs identified

No data

BRAZIL

Background to pilot

Baseline country conditions

A 2002 survey of the sentiment of civil society organizations toward the Bank and its processes reflected a negative opinion. In general, respondents considered the Bank to be an opaque institution with dubious objectives. The lack of information in Portuguese and the lack of participatory, transparent activities contributed largely to this sentiment.

Stated goals

- Greater transparency;
- Improved access to information in Portuguese;
- Enhanced working relationships with CSOs.

Main activities undertaken:

- Translate Bank documents (CAS, PIDs, etc.) into Portuguese (about 90 completed);
- Conduct survey of NGOs to identify needs and barriers to better engagement;
- Improve PIC website and make Bank documents available there.

Audiences targeted, reached

Project targeted general public, government officials, social movements, NGOs, and academics. Social movements were a loud critic of the Bank in Brazil and were a particular focus of the activities.

Key observations by evaluative goal or indicator

Outcomes

The activities undertaken and outcomes of the pilot were limited in scope. A follow-up survey to gauge changes in CSO sentiment was canceled due to the overwhelmingly negative feedback culled from the first (2002) survey. The results of this survey, however, were used in preparing CAS consultations in 2003.

Relevance, timeliness, and comprehensiveness of information disclosure activities

In the context of fierce criticism from social movements, the translation activities, which comprised the bulk of Brazil's activities under the pilot, were relevant. The 2002 CSO survey indicated that access to Bank publications and access to Portuguese versions of major policy work was a major roadblock to improved relations between the Bank and CSOs. The scope of the dissemination activities was narrow, and only a portion of the planned activities were implemented (and only a portion of the allocated funds were used).

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

It is difficult to isolate the impact of the pilot activities from that of other efforts at enhanced disclosure and transparency that were occurring in Brazil in the early 2000s. However, all respondents noted a more positive working relationship with Brazil's CSO community today as compared with the late 1990s, before CAS consultations and other measures were taken.

Costs and risks to Bank

Respondents noted the risk of inviting multiple interlocutors to the table while being accountable only to the government. All respondents agreed that the benefits of inclusion, transparency, and disclosure are much higher than the risks.

Costs to counterparts and government partners

None reported.

Benefits

One respondent noted that the translation and dissemination activities, especially for the 2003 CAS, were a major landmark in the Bank's relationship with CSOs. Publishing the 2003 CAS in Portuguese removed a major impediment to communication with some factions of Brazil's social movements.

Sustainability

- Lack of funding and attention to continued translation;
- CAS consultations were more limited in scope than 2002-03 round;
- General sense that disclosure has lost some momentum.

Additional capacity-building needs identified

Institutionalizing translation of major documents and providing funding for translation in the planning phases would be useful.

BULGARIA

Background to pilot

Stated goals

- Better public understanding of poverty issues and policies;
- Better public acceptance of Bank's analytical work
- More dialogue and feedback on poverty-related policy and program issues.

Main activities undertaken

- Disclosure and dissemination of current poverty assessment;
- Disclosure and dissemination of other documents such as final CAS;
- Draft pamphlets explaining Bank's processes and purposes of CAS and poverty assessment.

Audiences targeted, reached

Project targeted public, media, government officials, NGOs, academics, and trade unions. Extra engagement and training efforts with journalists on poverty assessment and CAS issues.

Key observations by evaluative goal or indicator

Outcomes

All documents disclosed were finished documents. The purpose of the activities was to inform; therefore feedback was not an intended, immediate effect. The Bank office held "road shows" throughout the country and provided training seminars for journalists on the World Bank's processes and products.

Relevance, timeliness, and comprehensiveness of information disclosure activities

Respondent described disclosure pilot activities as "absolutely necessary" due to the general sense of confusion and skepticism about the Bank and its reports (particularly the poverty assessment). Respondent considered the activities successful at building capacity within media, government, and the public to engage with the Bank.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

Respondent described prepilot as a time when the Bank was losing the government's attention. Some findings of the poverty assessment were in direct contrast to the official government stance, such as the vulnerability of pensioners versus other groups at risk for poverty, such as young families and ethnic minorities, and on the nonincome aspects of poverty.

The Bank found that journalists, media, government officials, and public were unaware of the Bank's processes, methods, and credibility as a source of data. The public and government officials saw the Bank as mysterious and opaque. The pilot activities helped to demystify the Bank and to bolster its credibility as a research institution and source of reliable data.

The "road shows" showcased the Bank's methodology, data collection, and expertise, and engaged think tanks and government officials on best practices for measuring poverty and determining key policy reform priorities. This helped make the report and the Bank's processes seem less mysterious or fabricated than before this wave of disclosure and outreach efforts.

Costs and risks to the Bank and government partners

Timing of disclosure of documents containing politically sensitive materials can be difficult. The Bulgarian government asked the Bank to delay publication of the poverty assessment because of different data and findings than official government reports. After dissemination events with government officials, Bank publications were embraced and even incorporated into national strategy (e.g., the government used 13 sectors identified in the poverty assessment). As political support gradually grew for the Bank, the risks of openness declined for the government. Bank must be flexible in addressing government's concerns over openness, but the risks of withholding are always higher in the long-run.

Benefits

While documents were finished after pilot activities occurred, the increased knowledge about the Bank and its processes led to increased involvement, participation, and ownership on behalf of government and academia in later consultations. Disclosure helped country to internalize the process, to improve dialogue among the government, the Bank, and CSOs. The interactive process allowed the Bank to learn better the priorities of the different groups, which contributed to the development of future strategy-related documents.

Sustainability

Media, public, and politicians have an increased understanding of the Bank and its work and an increased capacity to engage with the Bank. New politicians enter office with a better understanding of the Bank and capacity for engaging with it than before the disclosure and dissemination efforts.

Additional capacity-building needs identified

Disclosure alone is not sufficient to generate results and to engage civil society. Capacity must be built within target audiences for them to utilize the information and engage in dialogue with the Bank.

DOMINICAN REPUBLIC

Background to pilot

Baseline country conditions

Respondents observed a general misunderstanding of the Bank and its role in the country, within government, and among the public.

Stated goals

- Greater awareness of Bank's mission among key stakeholders and population at large;
- More strategic alliances to define and implement the agenda as it relates to the Millennium Development Goals;
- Enhanced use of country website;

Main activities undertaken

- Create website for the disclosure and dissemination of Bank documents;
- Translate and disseminate official products online (including 2004 CAS Progress Report).
- Produce four-page summaries in Spanish of major World Bank papers;
- Provide information about ongoing projects.
- Produce four-page summary of draft CAS for consultations and distributed in advance to participants.

Audiences targeted, reached

Project targeted general public, media, government officials, NGOs, and academia.

Key observations by evaluative goal or indicator

Outcomes

- Increased understanding of the Bank and its processes;
- Increased and more balanced media coverage of the Bank than before the pilot and related disclosure activities;
- Demystified CAS process and led to greater participation and inclusion of CSO suggestions in final CAS (youth provisions) than before the pilot and related disclosure activities;
- Noticeably more informed congress, more able to engage with the Bank;
- Greater acceptance of Bank as an analytical organization or source for information (increased press quotes from World Bank reports)

Relevance, timeliness, and comprehensiveness of information disclosure activities

Summary documents provided to CAS consultation participants in time for meaningful contribution. Feedback from consultations impacted final CAS. Website with translated documents accessed frequently and used as tool for communication between country office, media, and public.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

More positive press and use of Bank's analytical work

Costs and risks to Bank

Releasing draft documents is risky because it opens the Bank and client to unfair criticism of policies that are not refined.

Costs to counterparts and government partners

None reported.

Benefits

Perceptions of the Bank among various stakeholder groups improved. With new information and understanding of the Bank, government officials and CSOs are better equipped to engage with the Bank.

Sustainability

Respondents noted that even new governmental officials are now more familiar with the Bank and prepared to engage than before pilot and related disclosure activities. Continued publication of information to the improved country page enhances dialogue between Bank staff and stakeholders and the media.

Additional capacity-building needs identified

The greatest need is internal – Bank staff should learn to communicate with counterparts and stakeholders in plain language. In addition to translating from English to local languages, Bank staff must be equipped to translate from technical language and Bank jargon to language that facilitates enhanced understanding and inclusion. Also, funding for translation is essential.

INDONESIA

Background to IDF grant-funded umbrella disclosure project:

Baseline country conditions

The post-Suharto government was committed to enhancing transparency and promoting anticorruption strategies. Civil society and government wanted citizens to be engaged in monitoring the implementation of development projects and the use of official development assistance. Especially in the early 2000s, Indonesians' perceptions of the Bank were negative. There was a sense that the Bank was an overbearing lender with too much control over domestic policymaking.

Stated goals

- Institutionalize disclosure of procurement and audit information;
- Enable civil society to provide effective oversight and reduce misuse of funds;

Main activities undertaken

- Develop revised government strategy for disclosure and draft presidential decree on disclosure of information;
- Draft legal framework to systematize blanket disclosure of procurement information, midterm reviews and audit reports;
- Technical assistance and institutional capacity building related to transparency and anticorruption;
- Workshops and trainings for different targeted stakeholder groups on disclosure and access to information.

Audiences targeted, reached

Project targeted public, media, government officials, NGOs, and academia.

Key observations by evaluative goal or indicator

Outcomes

Anecdotal evidence suggests that increased disclosure has resulted in improved oversight by civil society. More complaints are received, which suggests the public is able to access information (before, not enough knowledge to know to complain or where to direct complaints).

Relevance, timeliness, and comprehensiveness of information disclosure activities

"Timeliness" is difficult to judge. A main issue is the need to build capacity of CSOs and to create demand for the disclosed information for monitoring purposes.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

Respondents did not speak to this point, emphasizing that comparisons were difficult to draw. Anecdotally, the respondents noted more outside interest in Bank-funded projects, citing examples of inquiries from college professors and members of concerned CSOs.

Costs and risks to Bank

Respondents said there was no risk in disclosing final audit and midterm reports and noted that the real risk was in not disclosing and said that the costs in personnel time were small compared

to the benefits. The country office decided not to release aide mémoires (decision made at corporate level, not by country office team) because of concern that the opportunity for candid and confidential dialogue between Bank staff and government counterparts would be compromised. The country office decided against disclosing midterm or draft audits because of the risk of perverse incentives on behalf of private auditors.

Costs to counterparts and government partners

Indonesian government was in favor of increased disclosure and saw only benefits to be gained (by enhancing reputation).

Benefits

Credibility for:

- The Bank—changed the pervasive view that the Bank operates in a secretive way and is not open for a *reason*. Also, during Suharto years, public perceived that the Bank turned a blind eye to corruption.
- Projects—the public is likely to support Bank-funded projects if it is assured the projects are fair and well governed (open procurement policies and other project implementation disclosure).
- Government—in an environment of anticorruption reforms, the government has an interest in being as transparent as possible.

Sustainability

All policies are still in place today. The disclosure provision is included in all loan and credit agreements to date.

Additional capacity-building needs identified

The country should adopt a more centralized, systematic means of accessing disclosed information. There are plans for a central website portal.

NICARAGUA

Background to pilot

Baseline country conditions

Respondents noted a general suspicion and skepticism surrounding the Bank's role.

Stated goals

- Support information disclosure activities and launch of PIC;
- Improve understanding of the Bank's work in Nicaragua.

Main activities undertaken

- PIC website created for release of all relevant donor reports;
- Translated CAS;
- Implemented Dialogues on Development series (six presentations a year on topics related to Bank's analytical products and lending activities).

Audiences targeted, reached

Project targeted public, media, government officials, NGOs, and academia. Dialogues on Development series targeted different audiences relevant to each topic.

Key observations by evaluative goal or indicator

Outcomes

Pilot activities helped equip government officials, CSOs and other constituencies with an improved understanding of the Bank's work and therefore an improved ability to express opinions, creating a forum for Bank and government authorities to hear the views of CSOs. This enhances the Bank's consultative processes.

While CAS was completed, the results of the disclosure pilot activities fed back into the Bank's work in Nicaragua – in subsequent PRSPs, etc. When CSO views were in opposition to those of the Bank team, staff were able to revise texts to further explain decisions for including or excluding certain areas or activities.

Relevance, timeliness, and comprehensiveness of information disclosure activities

Activities were relevant, timely, and comprehensive given the funds available and timeframe. No draft CAS in progress.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

Public perceptions of the Bank and opportunities for inclusion have improved since the pilot and other disclosure activities.

Costs and risks to Bank

Small concern related to the timing of disclosure and the ability for candid dialogue between the Bank and government.

Benefits

The value of disclosure is not so much in the way the Bank does business but in changing the way people receive the Bank and its activities within the country. Disclosure reduces the stigma or skepticism about the Bank.

Sustainability

The enhanced disclosure efforts seem sustainable in the long-term because of the PIC's role in housing and disseminating documents.

Additional capacity-building needs identified

Governments need to adopt capabilities regarding disclosure. Currently, governments disclose only to the extent of the Bank's disclosure policy. It would prove beneficial for countries to develop their own disclosure policies.

PHILIPPINES

Background to pilot

Baseline country conditions

As part of anticorruption efforts, a desire emerged for more CSO monitoring efforts in donor-funded projects. CSOs were equipped with little information about ongoing projects.

Stated goals

- Provide CSOs and general public with the information necessary to perform more monitoring of donor-funded projects;
- Increase transparency of Bank-funded projects and Bank processes;

Main activities undertaken

- Launched Knowledge for Development Centers (KDCs) throughout country, with university partners;
- Produced a booklet listing projects, components, how CSOs could be involved and contacts;
- Launched initial phase of interactive map of ongoing projects.

Audiences targeted, reached

Project targeted public, media, government officials, NGOs, and academics.

Key observations by evaluative goal or indicator

Outcomes

The country office received more feedback from NGOs regarding projects and inquiries about opportunities for participation, though respondent attributes this to a general trend toward more openness in the Bank. Citizens are aware of Bank's processes and activities and are better able to track development projects. KDCs helped share knowledge and spark dialogue relating to donor-funded activities. CAS consultations were also held at the KDCs. Staff and facilitators knew the local constituencies on a personal basis.

Relevance, timeliness, and comprehensiveness of information disclosure activities

Activities were relevant, timely, and comprehensive given the scope and aims of the pilot.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

While unable to attribute to the pilot activities, the respondent noted a higher level of engagement between the Bank and CSOs than in the six or seven years prior to the enhanced disclosure activities.

Costs and risks to Bank

Personnel costs and no major risks.

Costs to counterparts and government partners

None cited.

Benefits

Credibility for the Bank and government. Enhanced engagement with civil society.

Sustainability

KDCs are sustainable because they are staffed by university personnel and run with university resources, with assistance from the country office.

Additional capacity-building needs identified

Budget must take disclosure and dissemination into account. Government should develop its own disclosure policies and disclose information on all donor-funded projects, not only piecemeal disclosure depending on the policies of the donor agency.

TANZANIA

Background to pilot

Baseline country conditions

CSOs wanted more information about ongoing projects. The Bank's country office wanted to enhance the transparency of the Bank's operations.

Stated goals

- Increase transparency of Bank's operations in Tanzania by releasing to the public the Country Portfolio Performance Review (CCPR) for 2003.
- Launch PIC

Main activities undertaken

- Released summary information on 2003 CPPR
- Held conference with media and NGOs to discuss findings of CPPR
- Participatory 2005 CPPR plans were never implemented due to government switching focus to joint CAS deliberations.

Audiences targeted, reached

Event targeted government officials, media and CSOs.

Key observations by evaluative goal or indicator

Outcomes

Outcomes were limited due to the delay of the CPPR. Government had limited resources to engage in discussions about the CPPR and CAS simultaneously.

Relevance, timeliness, and comprehensiveness of information disclosure activities

Activities were relevant, timely, and comprehensive given the scope and aims of the pilot.

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

None cited.

Costs and risks to Bank

Personnel time is the biggest cost. Staff have to prepare more for public events and also draft summary documents. Risks are minimized because only summary of CPPR content was released, not the entire document. Respondent believed that releasing the document would have compromised candid dialogue between the Bank and the government.

Costs to counterparts and government partners

None cited. Government was willing and eager to cooperate on disclosure because of legacy of socialist state—ideology of empowering citizens.

Benefits

- Bank and government benefit from more positive image;
- Donors and government can agree on implementation guidelines;
- Press coverage makes planning and monitoring essential;

- Public is exposed to the expected outcomes of projects;
- In areas where beneficiaries are expected to make a contribution to the project, CPPR information makes a compelling case for participating.

Sustainability

The project was derailed because of the government's inability to put resources into CPPR during CAS consultations.

Additional capacity-building needs identified

None identified.

UKRAINE

Background to pilot

Baseline country conditions

Generally low level of understanding about the CAS and the Bank as a whole.

Stated goals

- Prepare CAS with enhanced participation from CSOs;
- Increase public's knowledge of the Bank's activities and products.

Main activities undertaken

- Preparation of summary CAS documents and other materials as background for consultations and for media;
- Preparation and dissemination of seven sector notes;
- Consultations with federal and local governments, NGOs, think tanks, and business community.
- Hosted various planning sessions and workshops;
- Launched CAS consultation website.

Audiences targeted, reached

Project targeted the public, media, federal, and municipal government officials, NGOs, and academia.

Key observations by evaluative goal or indicator

Outcomes

- Participatory CAS launched;
- Public awareness of CAS agenda enhanced;
- Communication channels between Bank, government, CSOs, and business community opened.

Relevance, timeliness, and comprehensiveness of information disclosure activities

Activities were thorough and feedback from consultations was considered with due time for impact on final CAS (approximately six months).

Pre-post controls: comparisons by respondents with conditions prior to pilot or other countries

Respondent noted that the public and the government were suspicious of the Bank before the pilot activities. Government established a counterpart to the CAS team and worked closely with the Bank's staff throughout the process. Communication and trust was enhanced. It is difficult to compare before and after due to political turbulence.

Costs and risks to Bank

Minimal costs (personnel and material). There are risks in not explaining the Bank's position well, especially with regard to media who may spin issues to reflect negatively if the Bank has not asserted clearly its positions.

Costs to counterparts and government partners

Personnel costs if staffing a shadow team to the CAS team.

Benefits

- Engagement with different stakeholder groups
- Improved working relationships with CSOs and government counterparts;
- An enhanced capacity for civil servants in terms of *doing* policy (in transition country case);
- Enhanced credibility for the Bank when government changes hands (if consultations were conducted with the public and not just the previous government).

Sustainability

The long-term effects of the disclosure activities include sustained, improved working relations between different stakeholder groups and the Bank and between the Bank and the government. Capacity built among civil servants is also sustained (in terms of analyzing, prioritizing, and taking ownership of policy decisions).

Additional capacity-building needs identified

In consultations, necessary to reach a wide spectra of CSOs, not just “friends” of the donor community. Critical feedback is necessary. Respondent also emphasized the importance of providing summaries in local languages and free of technical jargon.

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