PAR Monitor Report Albania

STRATEGY FOR PUBLIC ADMINISTRATION REFORM

2024/2025

IDM

CONTENTS

I. ACKNOWLEDGMENTS

The Strategy for PAR Albania 2024/2025 report is a product of a month and a half long monitoring process, which relied on different data collection techniques and thus resulted in an abundance of findings.

As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to members of the WeBER Platform and the National Working Group in Albania, and other stakeholders in Albania that shared their experiences through interviews, who immensely contributed to the content of this report and its quality, and who will not be identified due to the respect of the principle of anonymity.

Lastly, the WeBER3.0 team would also like to thank its main partners and associates, who have supported the project in research and other activities. Most notably, these are the SIGMA (Support for Improvement in Governance and Management)[1], the ReSPA (Regional School of Public Administration), the Department of Public Administration and the Ministry for Public Administration and Anti-Corruption of Albania, as a project associate.

II. ABOUT WEBER 3.0

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

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

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

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

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

EXECUTIVE SUMMARY

The assessment of transparency and inclusiveness of the PAR agenda in this report focuses on two critical issues – 1) participatory development of PAR planning documents, that includes non-state actors, and 2) involvement of CSO in the work of the governmental PAR coordination and monitoring mechanisms. For the former, the assessment briefly emphasises basic regulatory requirements for conducting consultations, continuing with the assessment of practices in involving external stakeholders and the public in the different stages of policy development for a sample of 4 PAR planning documents adopted since the PAR Monitor 2021/2022. For the latter, this report examines the extent and methods of CSOs' and other non-state actors' involvement in the PAR coordination and monitoring, both at the political and at the administrative levels, highlighting how institutionalised, and how meaningful, any such involvement is in practice. Findings of this report reflect the period since the publication of the PAR Monitor 2021/2022, starting from the second half of 2022, and until the end of 2024.[2]

In the area of planning documents, Albania's legal framework, grounded in the Code of Administrative Procedures and Law 146/2014 provides a solid basis for public and non-state actor participation by ensuring that interested parties are informed, can submit feedback, and have their comments considered. In practice, however, for the documents that form the PAR strategic framework such as, - the Roadmap for PAR 2023–2030, - the Public Finance Management Sectoral Strategy 2023–2030 and Action Plan 2023–2026, - the National Cross-cutting Strategy for Decentralization and Local Governance 2023–2030 and Action Plan 2023–2025, - and the Cross-cutting Strategy "Digital Agenda of Albania 2022-2026" which reflect updated timelines and evolving reform priorities, the consultation processes remain inconsistent. Early-phase consultations with CSOs and other non-state actors are generally conducted with sufficient lead time and involve a variety of stakeholders, however participation is achieved primarily through direct invitations, thereby limiting openness, and the dissemination of preparatory materials and feedback mechanisms varies considerably across documents.

Similarly, in the area of PAR monitoring and coordination, the framework, operating under the Integrated Policy Management Groups and regulated by frequently updated official orders of the Prime Minister, stipulates civil society participation only as invited members rather than permanent ones. Consequently, CSO involvement is ad hoc, and meetings are held irregularly,

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

with insufficient documentation (e.g., missing meeting minutes and outdated online reporting). Interviews with non-state experts who have engaged in consultations for various PAR strategic documents, further emphasize these challenges. While they point out that moderate progress has been made in integrating CSOs, their contributions have not significantly altered the final strategies, and systemic issues such as delayed information sharing and unsatisfactory coordination are still present. Overall, Albania meets the legal baseline for transparency and inclusiveness but substantial improvements are needed to make sure that the planning, consultation, and monitoring processes for key public administration reform documents display consistent transparency and offer meaningful participation. It is recommended that responsible institutions enhance the openness of the consultation process by adopting open call procedures for CSO involvement in early phase consultations and by ensuring the consistent sharing of preparatory materials.

Additionally, improvements in feedback mechanisms are needed, such as guaranteeing the timely and detailed publication of consultation results. It is also strongly advisable that the monitoring and coordination structures clarify their definitive modus operandi, increase meeting frequency, secure systematic CSO participation through open calls rather than ad hoc invitations, and upgrade in real-time information sharing via platforms like the Integrated Planning System.

LIST OF ABBREVIATIONS AND ACRONYMS

CSO	Civil Society Organization
DoPA	Department of Public Administration
EU	European Union
FOI	Freedom of Information
IDM	Institute for Democracy and Mediation
IDRA	Institute for Development Research and Alternatives
IPMG	Integrated Policy Management Groups
IPSIS	Integrated Planification System
PAR	Public Administration Reform
PFM	Public Financial Management
RESPA	Regional School of Public Administration
RIA	Regulatory Impact Assessment
SASPAC	State Agency for Strategic Programming and Aid Coordination
SIGMA	Support for Improvement in Governance and Management
SPC	Strategic Planning Committee
UN	United Nations
WeBER	Western Balkan Enablers for Reforming Public Administrations
WG	Working Groups

I. WEBER PAR MONITOR: WHAT WE MONITOR AND HOW?

I.1 WeBER's approach to monitoring PAR

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

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

Table 1: Main changes in the PAR Monitor methodology

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

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

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

Data sources

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

PAR Monitor reporting

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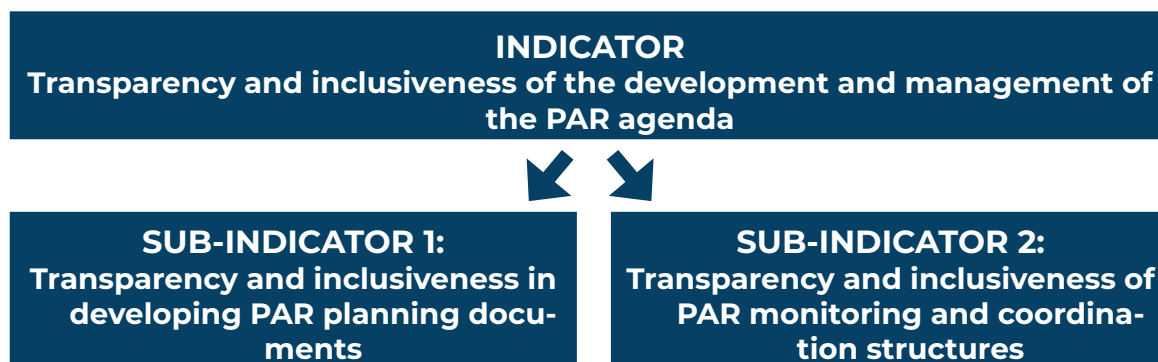- Six regional Western Balkan overview reports, one per PAR area (6 in total)

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

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

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

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

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

<table>
<tr><td colspan="2">INDICATOR
Transparency and inclusiveness of the development and management of the PAR agenda</td></tr>
<tr><td>SUB-INDICATOR 1:
Transparency and inclusiveness in developing PAR planning documents</td><td>SUB-INDICATOR 2:
Transparency and inclusiveness of PAR monitoring and coordination structures</td></tr>
</table>

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

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

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

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

Table 2: Indicator elements under the sub-indicator 1

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

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

- The Roadmap for the Public Administration Reform 2023-2030
- Public Finance Management Sectoral Strategy 2023-2030 and Action Plan 2023-2026
- The National Cross-cutting Strategy for Decentralization and Local Governance 2023-2030 and Action Plan 2023 – 2025
- The Cross-cutting Strategy "Digital Agenda of Albania" and Action Plan 2022-2026

The second sub-indicator monitors civil society participation in PAR coordination and monitoring structures at both the political and administrative levels. It focuses exclusively on bodies established for the most comprehensive PAR strategic document (e.g., PAR strategies). The assessment first examines whether the strategic PAR agenda provides for civil society participation in these structures. It then analyses the institutionalisation of this participation

— specifically, the format of CSO involvement in administrative and political PAR coordination bodies and whether selection processes are open and competitive. When it comes to practice, the sub-indicator assesses the regularity of meetings with CSO participation and the transparency of communication regarding the work of PAR coordination and monitoring bodies. Finally, it assesses whether CSOs can meaningfully contribute to these bodies' work, as an indication of outcome of participatory approach to PAR agenda coordination and monitoring.

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

Indicator elements that are assessed under the sub-indicator 2 are listed in the Table 3.

Table 3: Indicator elements under the sub-indicator 2

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

II. TRANSPARENCY AND INCLUSIVENESS OF THE DEVELOPMENT AND MANAGEMENT OF THE PAR AGENDA

Transparency and inclusiveness of the development and management of the PAR agenda (score 0-100)

34.5	65.5
Awarded	Not achieved

II.1 Transparency and inclusiveness in developing PAR planning documents

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

Sub-indicator 1: Transparency and inclusiveness in developing PAR planning documents[5]

Indicator elements	Element type	Score
E 1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation	3/5
E 1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation	4.5/9
E 1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation	0/8
E 1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation	1.25/6

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

E 1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation	6.75/9
E 1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation	5/9
E 1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation	8/10
E 1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact	0/4
Total score for sub-indicator 1		**28.5/60**

Consistent with the previous WeBER monitoring cycle, the strategic framework for Albania's Public Administration Reform (PAR) includes several planning documents. The previous Cross-Cutting PAR Strategy was valid until 2022[6] and only on 03 February 2025 was the new Cross-Cutting Public Administration Reform Strategy 2024-2025 published for public consultation on the online portal.[7] Therefore, this report analyses the current official planning documents that form the strategy framework which include,- the Roadmap for the Public Administration Reform 2023-2030,- the Public Finance Management Sectoral Strategy 2023-2030 and Action Plan 2023-2026,- the National Cross-cutting Strategy for Decentralization and Local Governance 2023-2030,- and action Plan 2023–2025 and the Cross-cutting Strategy Digital Agenda of Albania" and Action Plan 2022-2026.[8] The strategy documents along with the legal procedures undertaken to adapt them, comprise the pool used for analysing the elements under this sub-indicator. Although the overall strategic framework for PAR remains largely consistent with the previous cycle, the updated planning documents reflect revised timelines and updated reform priorities. Combined with the new action plans, they provide the basis for assessing the transparency and inclusiveness of the processes involved in developing Albania's PAR planning documents.

In Albanian legislation consultations with stakeholders and targeted groups during the development process of draft acts are foreseen, though not mandatory for every consultation procedure. The Code of Administrative Procedures in the Republic of Albania recognizes "holders of collective interests or interests

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6   National PAR Monitor Albania 2021-2022 Report, p.22, National PAR Monitor 2021/2022 - Albania - WeBER 3.0

7   Draft Strategjia Ndërsektoriale për Reformën në Administratën Publike 2024-2030

8   Decision No. 737, dated 13 December 2023, "For the approval of the guidelines for public administration reform 2023–2030"

of the wider public"[9] as a party in administrative procedures. Public institutions inform these parties about the goals and duration of the procedure, as well as their rights to access it.[10] Parties have the right to submit comments or suggestions at each phase of the procedure, while the public institution assesses the received feedback in writing.[11] The Law on Notification and Public Consultation acknowledges draft laws, national and local strategic documents, and policy draft documents as subjects of notification and public consultation.[12] It clearly stipulates civil society organizations (CSOs) as a group of interest in the notification and consultation process,[13] recognising their participation either in the initial phase before drafting the act if needed, in proposing the initiation of draft acts, or during their public consultation.[14] Institutions engage in identifying stakeholders and interest groups and determine at which phase these groups should be included whether from the initial phase or once the draft is published, while arranging the draft act consultation plan prior to drafting the act.[15]

The Regulatory Impact Assessment (RIA) methodology also foresees the inclusion of interested parties when assessing the impact of draft laws and recommends the applying the same standards to draft strategies and draft policy documents.[16] Groups of interests are informed and invited to participate at least 20 working days before the gathering.[17] However, public debates are not mandatory for every consultation. They are organised based on the importance of the draft act and on the level of public interest.[18] The public institution in charge of the consultation prepares an individual consultation report that includes comments that were approved and an explanation for those that were not approved. This report is published online at the consultation portal, and/ or at the institution's website and is shared with all parties that provided comments.[19] Although there is no legal deadline for the publication, it is recommended that the report be published before the approval of the draft act.[20] In addition, each institution publishes, on the public consultation portal

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9   Article 33/2, Law 44/2015 Code of Administrative Procedures in the Republic of Albania, https://qbz.gov.al/eli/ligj/2015/04/30/44

10   Article 42/2, Law 44/2015 Code of Administrative Procedures in the Republic of Albania.

11   Article 47-48, Law 44/2015 Code of Administrative Procedures in the Republic of Albania.

12   Article 1/1, Law 146/2014 on Notification and public consultation, https://qbz.gov.al/eli/ligj/2014/10/30/146

13   Article 2/4 and 8/1b, Law 146/2014 on Notification and public consultation.

14   Articles 12; 9/b, 11, Law 146/2014 on Notification and public consultation.

15   Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania, pp. 9, 13, 14.

16   Risk Assessment Methodology (2018), Prime Ministry of the Republic of Albania, p. 11, 19, https://www.kryeministria.al/wp-content/uploads/2022/06/RIA-Metodologjia.pdf

17   Article 17/2, Law 146/2014 on Notification and public consultation.

18   Article 17/1, Law 146/2014 on Notification and public consultation.

19   Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania, p. 26.

20   Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania, p. 24.

a sixth-month report and a yearly report summarising data on their public consultations. The Prime Ministry summarizes all findings of the consultation process held by the central government in two performance reports, the six-month and yearly report, published in the same portal.[21] On the other hand, legislation does not regulate the transparency of the work of working groups for PAR planning documents. In theory, such legal provisions ensure that civil society organizations (CSOs) and other stakeholders can participate early in the process and that consultation results are compiled and made publicly available.

However, while the rules set clear parameters for transparency and inclusive-ness[22], the practical implementation of these measures across different planning documents remains uneven, with the transparency of the consultation working groups (WGs) and the manner in which their findings are conveyed still weakly regulated. For several key PAR planning documents under review, including the Roadmap for PAR 2023-2030, the Public Financial Management (PFM) Strategy, and the National Cross-cutting Strategy for Decentralization and Local Governance, the assessment found that early-phase consultations were generally organized in line with legal expectations.[23] In practice, consultations with non-state actors were initiated considerably earlier than the formal publication of draft documents, for instance, as early as April 2023 for the Roadmap and from March 2022 for the National Cross-cutting Strategy.[24] These consultations were conducted through a mix of in person and online meetings, and working documents[25] as well as sufficient time, were provided for participants to prepare their inputs. Nevertheless, the process did not include open calls published on institutional websites or social media channels. Instead, participation was achieved primarily via direct invitations, mostly through emails, thereby limiting the openness of the process. In several instances, a wide range of different stakeholders was included.

For example, at the direction of the Department of Public Administration, meetings for the Roadmap for PAR 2023-2030 involved independent experts, academics, and CSO representatives.[26] Similarly, consultations related to the PFM Strategy and the National Cross-cutting Strategy included participation from international organizations, donor agencies, and local CSOs.[27] However, in the case of the Cross-cutting Strategy "Digital Agenda of Albania" and Action Plan 2022-2026, only generic references were made to civil society involvement

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21 Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania, pp. 28, 31.

22 Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania, pp. 9, 13, 14,24,26,28,31

23 Inferences drawn through assessment of information received by FOI request answers and the final consultation report of the different strategies in the consultation portal.

24 National Cross-cutting Strategy, Document "Raporti Final", Projektvendim "Për miratimin e Strategjisë Ndërsektoriale për Decentralizimin dhe Qeverisjen Vendore, 2023-2030, të Planit të saj të Veprimit dhe të Pasaportës së Treguesve"

25 Such as inception or concept documents

26 National non-state actors as also representatives of international ones such as SIGMA or RESPA.

27 Such as the EU delegation in Albania, UN Women, Swedish, Austrian or Swiss Embassy

without detailed evidence on the range or transparency of the selection process. In general, there is a lack of inclusiveness and participation in the early consultation process of trade unions, business associations and organizations focusing on gender equality or the rights of persons with disabilities. The only exception was the consultation for the PFM Strategy where substantial feedback and comments were provided by UN Women, the majority of which were refused.

According to FOI responses, the institutions responsible for the Roadmap and PFM Strategy provided working documents and clear information on the duration and channels for submitting contributions.[28]In the process for developing the Roadmap 2023-2030, meeting agendas and supporting documents were shared via email, although it remains unclear whether all preparatory materials (such as screening reports) were distributed in advance.[29]

For the National Cross-cutting Strategy, while development partners and experts participated actively[30], there was occasionally insufficient clarity regarding the exact timelines for comment submission. By contrast, the Digital Agenda, did not offer substantial evidence of thorough information sharing.[31]Different feedback mechanisms were observed across the various strategies. For the Roadmap development process, the consultation report, retrieved via FOI, grouped comments thematically without identifying individual senders or providing detailed justifications for each response. In comparison, for the PFM Strategy and the National Cross-cutting Strategy, feedback was published online with clearer indications of which comments were accepted or rejected, along with accompanying explanations.[32] Again, the Digital Agenda fell short in this regard, with no evidence of published feedback on stakeholder contributions.

Public debate is an important component of the consultation process and the various strategies have undergone this procedure as well. For the Roadmap, the official call to participate in the public debate was published on both the institution's website and the public consultation portal, with the debate lasting over 57 days across two phases.[33] Despite the lengthy consultation period, however, the final report on the public debate was not made available online. For the PFM Strategy, the public debate lasted 31 days[34], slightly shorter than the statutory minimum[35], and although feedback was published, the evidence suggests that the process could be more robust as the majority of the com-

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28 The Department of Public Administration for the Roadmap and the Ministry of Finance for the PFM

29 Conclusions drawn from FOI answers and interviews with key experts

30 Such as Swedish or Swiss Embassy as well national CSOs such IDM or IDRA

31 Neither through FOI answers or public final reports in the consultation portal

32 National Cross-cutting Strategy, Document "Raporti Final", Projektvendim "Për miratimin e Strategjisë Ndërsektoriale për Decentralizimin dhe Qeverisjen Vendore, 2023-2030, të Planit të saj të Veprimit dhe të Pasaportës së Treguesve"; RENJK_721_RaportKonsultativ.pdf

33 Lista Konsultimeve

34 PVKM "Per miratimin e Strategjise Sektoriale per Menaxhimin e Financave Publike 2023-2030"

35 19 working days excluding 3 non-working days, less than 20 foreseen in legislation

ments were refused.[36] The National Cross-cutting Strategy's public debate, which spanned 48 days, met most criteria[37], whereas the Digital Agenda's public debate, held over just 15 days[38], did not meet the duration requirements set by legislation.

Interviews with key informants[39] provided mixed insights into the transparency and inclusiveness of the PAR planning documents development process. For the Roadmap, one interviewee fully agreed that the process was transparent and inclusive, while another indicated that meaningful involvement depended mostly on personal contacts rather than on a systematic approach. In the case of the National Cross-cutting Strategy for example, one key informant was highly satisfied with the process, noting that their inputs were discussed and integrated. On the other hand, this is not the case in every strategy development process. Another expert expressed concern that their CSO contributions were not meaningful because the main points of these strategies remained largely unchanged from the original drafts produced by the relevant institutions. These mixed responses did not meet the threshold for awarding points in this element, and clearly reflected the ongoing difficulties in making sure that consultation processes are consistently viewed as transparent and inclusive by all stakeholders.

On the whole, Albania's regulatory framework provides a strong foundation for guaranteeing transparency and inclusiveness in the development of PAR planning documents. Early consultations and public debates are generally conducted in a timely manner and involve various non-state actors. Nevertheless, several gaps were noticed such as the absence of open calls for participation of non-state actors, limited regulation of working group operations, variable dissemination of specific preparatory information, and insufficient publication of detailed feedback on consultation inputs. Moreover, the reliance on invitations issued solely by the responsible institutions[40] or on personal contacts limits the overall openness of the process. These findings suggest that while legal requirements are met, there is significant room for improvement to ensure that the development process is both transparent to external monitors and fully inclusive of all relevant actors.

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36 RENJK_721_RaportKonsultativ.pdf

37 Projektvendim "Për miratimin e Strategjisë Ndërsektoriale për Decentralizimin dhe Qeverisjen Vendore, 2023-2030, të Planit të saj të Veprimit dhe të Pasaportës së Treguesve"

38 Projektvendimi "Për miratimin e Agjendës Digjitale 2021+ dhe Planit të Veprimit 2021+

39 National experts from CSOs and academia

40 Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania

How does Albania do in regional terms?

Sub-indicator 1: Transparency and inclusiveness in developing PAR planning documents
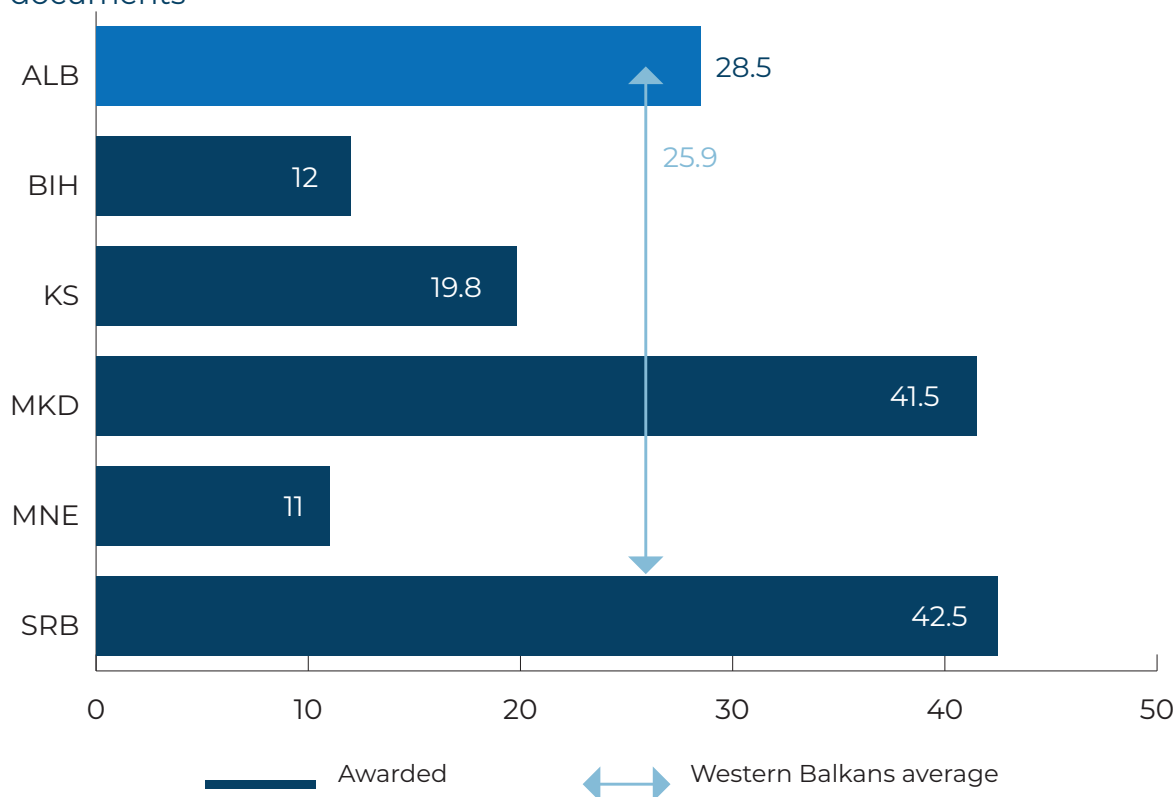
II.2 Transparency and inclusiveness of PAR monitoring and coordination structures

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

Sub-indicator 2: Transparency and inclusiveness of PAR monitoring and coordination structures[41]

Indicator elements	Element type	Score
E 2.1 Participation of civil society in monitoring and co-ordination structures is envisaged in the PAR agenda	Strategy and policy	2/2
E 2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	2/3

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

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

In Albania, the current framework for monitoring and coordinating the Public Administration Reform (PAR) agenda features distinct administrative and political level structures within an integrated planification system (IPSIS).[42] This legal framework is evolving on an ongoing basis, notably from January 2024, the Ministry for Public Administration and Anti-Corruption has assumed responsibility of the political level of PAR. [43] As outlined in the PAR Roadmap 2023–2030, the strategy framework for PAR comprises various strategies and the establishment of related political and administrative mechanisms for these different strategies are regulated by various Prime Minister's Orders.[44]

The current coordination and monitoring structures for Public Administration Reform are governed within the framework of the Integrated Policy Management Group (IPMG), as set forth by the still legally binding Order of the Prime Minister no. 90, dated 1 August 2023, which replaced the older Order no.157, dated 22 October 2018. [45] All these structures, part of the strategic priority sector for Public Administration Reform, fall under the first IPMG on "Democracy, Rule of Law, and Good Governance." [46]This Order establishes a broad sectoral/intersectoral approach, as well as the creation and reorganization of integrated sec-

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42 Order of the Prime Minister no. 90, dated on 1.8.2023, Point 1, p.1

43 In this new Order no.90, the Ministry in charge of the first IMPG is the Ministry of State for Service Standards which was replaced in January 2024 by the Ministry of Public Administration and Anti-Corruption.

44 For example, Order of Prime Minister no.76, dated 22.4.2022 for the Decentralization Strategy or Order of Prime Minister no.57, dated 24.4.2023 for the Roadmap 2023-2030

45 Order of the Prime Minister no. 90, dated on 1.8.2023, Point 17, p.5

46 Ibid, Appendix 1, pp.1-2

toral/intersectoral mechanisms under different integrated policy management groups, and envisages the participation of civil society in the monitoring and coordination structures.[47] Assessment findings indicate that while civil society organisations have managed to secure representation within the monitoring and coordinating bodies, their inclusion is limited to invitations, as these bodies are subject to ongoing changes and restructuring. These requirements and the ways in which civil society is included at both administrative and political levels are further reflected in each specific strategy.

In the same legal document, the State Agency for Strategic Programming and Aid Coordination (SASPAC) is designated as the secretariat responsible for central-level coordination within the integrated sectoral/intersectoral management mechanism.[48] Specifically, SASPAC coordinates the participation of development partners, informs the Strategic Planning Committee (SPC)[49] every six months about the functioning of IPMGs, and works with civil society, independent institutions, academia, and business organizations to identify their interest in designated thematic teams and specific IMPGs, forwarding that information to the head of the respective integrated groups. For the PAR agenda under the first integrated group, the Directorate of Programming of Reform for Public Administration within the Department of Public Administration coordinates activities at the administrative level.[50]

The inclusion of civil society in monitoring and coordination administrative structures is envisaged but as noted above, it occurs only by invitation as CSOs are not full-fledged members.[51] For example, non-state actors and CSOs were invited to three different consultative meetings[52] for the first thematic group on "Democracy, Rule of Law, and Good Governance" for the development of the PAR Roadmap. In another strategy based on information retrieved via FOI and available on the strategy consultation portal page, the Ministry of Internal Affairs, lead institution for the Decentralization Strategy, used the mechanisms of the IPMG for consultations with relevant stakeholders including invited CSOs.[53]

Similarly, according to the requirements of Order of the Prime Minister no. 90 (dated on 1.8.2023), whose requirements on the modalities of the participation of CSO in both monitoring structures are followed by each PAR strategy development regulation, the participation of civil society in monitoring and coordination political structures is envisaged but as always when deemed necessary and upon invitation since they are not full-fledged members of the

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47 Ibid, Point 6, p.2; Appendix 1, pp.1-2

48 Ibid, Point 14, 19, 20, pp.4-5

49 This is a government body tasked with coordinating, reviewing, and guiding the development and implementation of national strategic plans to ensure that long-term policies and strategies align with the country's overall objectives.

50 Order nr.57 of the Prime Minister nr.57, date 24.4.2023, Appendix 2, p.2

51 Order of the Prime Minister no. 90, dated on 1.8.2023, p.2, point 6; Appendix 1, pp.1-2

52 See the assessment for sub-indicator one on the report here

53 RENJK_567_RAPORT-FINAL-konsultimi-SNDQV.doc, point 3

structures.[54]

The assessment, based on legal stipulations, online information and the interviews, reveals that the involvement of CSOs in both political and administrative level structures is ad hoc, primarily based on invitations issued via email or in person, with no established open call practices. Although the PAR strategy development and monitoring procedures mandates periodic oversight, meetings have been held irregularly over the past two years, sometimes with gaps exceeding the recommended six-month interval, which undermines the continuity, impact and agility of the oversight process.[55] In addition, there is a significant deficiency in the documentation of the PAR monitoring and coordination processes. No meeting minutes or other relevant records detailing the dates of such meetings were found on the websites of the responsible institutions, except for one instance on 14 September 2023 for an administrative level meeting of the PAR Strategy Roadmap, as noted in FOI responses from DoPA.

Furthermore, the transparency of the overall process is compromised by the absence of an up-to-date section on the websites of the responsible institutions, including the Department of Public Administration and the Prime Minister's Office, where monitoring reports or current documents related to PAR monitoring and coordinating structures should be accessible, a gap made more acute by the lack of an official website for the Ministry of State for Public Administration and Anti-Corruption.

For the most part, interviews with experts indicate that CSOs participation in the monitoring and coordination structures for PAR deals with the same problems perpetually made clear during this report. They constantly share these different problematics, such as the occasional participation through email calls determined by the leading by the institutions. Also, again, the way in which their recommendations are incorporated does not substantially change the primary content of the final strategies. In addition, the intended real time coordination through the Integrated Planning System is non-functional, resulting in delays in information sharing. But the experts also agreed that some of the challenges also arise from the civil society side, due to limited human resources and expertise.

In general, key informants expressed that more systematic efforts are needed to regularly notify and include CSOs in the process and to improve the implementation of their recommendations, even as authorities continue to work on reforms aimed at strengthening cooperation. To conclude, while Albania's framework for monitoring and coordinating PAR demonstrates some capabilities, it mostly faces notable challenges. On the one hand, the PAR monitoring mechanisms show promise through the inclusion of civil society and non-state actors, but on the other hand, the irregularity of meetings, a lack of clarity in

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54 Order of the Prime Minister no. 90, dated on 1.8.2023, p.2, point 6; Appendix 1, pp.1-2

55 Public administration in Albania 2024, SIGMA, p.14, https://www.oecd.org/en/publications/public-administration-in-albania-2024_5577d117-en.html

organizational modalities and the absence of open call procedures for participation, weaken the entirety of the oversight system.
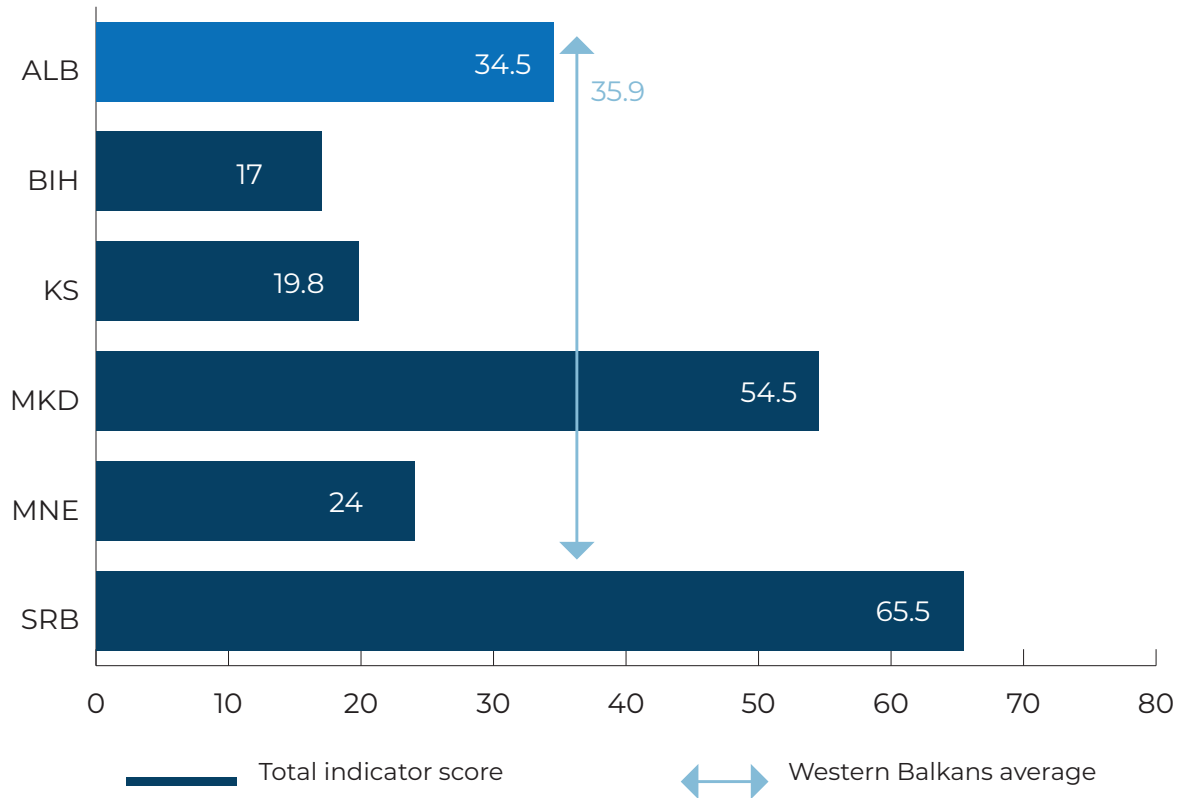
How does Albania do in regional terms?

Sub-indicator 2: Transparency and inclusiveness of PAR monitoring and coordination structures
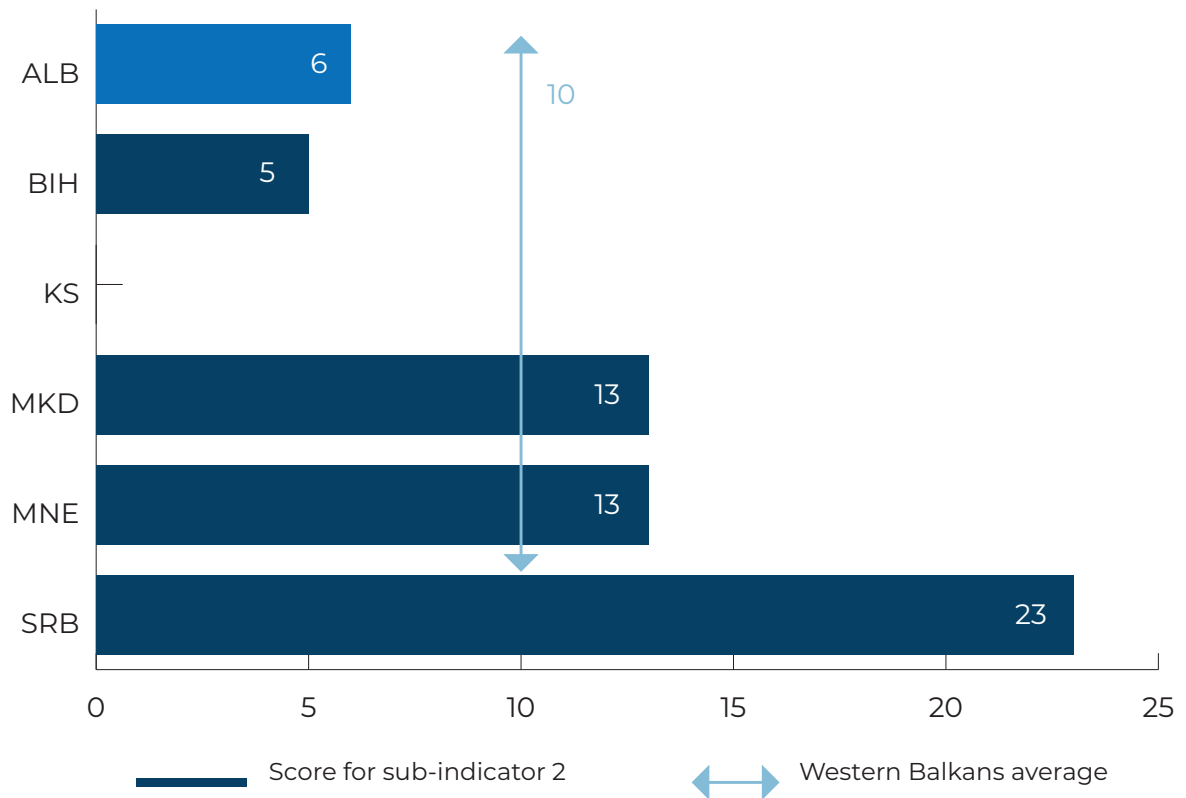
Overall scores comparison in the Strategy for PAR

Indicator: Transparency and inclusiveness of the development and management of the PAR agenda

Regional overview report for Strategy area, with results for all WB administrations is available at: www.par-monitor.org

II.3 Recommendations for the Strategy for PAR

II.3.1 Tracking recommendations from PAR Monitor 2021/2022

Recommendations	Type (short term/medium term/long term)[56]	Status	Explanation
1. CSOs should be able to participate in the administrative structures for PAR coordination and monitoring, not only in political-level structures.	Short term	Implemented	CSOs are able to participate upon invitation to PAR administrative coordination and monitoring structures. The assessed regulations cited in the report establish these procedures.
2. The annual work plan, agendas, and minutes of IPMG and technical secretariat meetings should be published.	Medium term	Not implemented	This recommendation is not implemented and further recommended for this monitoring cycle as well.
3. CSO participation should be open to all interested CSOs and not be restricted to members of the National Council of Civil Society.	Short term	Partially implemented	This recommendation is partly implemented. While the CSOs participation is not anymore restricted to the members of the National Council of Civil Society it is still not based on an open call but upon invitations by the institutions.

56   Recommendations that can be implemented within one year are classified as short-term, those requiring one to three years are designated as medium-term, and those needing more than three years are considered long-term.

4. Lead institutions should publish consultation reports that clearly identify the key topics of discussions, comments and feedback received, and their decisions on the contributions, in order to encourage public participation.	Short term	Partially implemented	This recommendation is partially implemented. Not all lead institutions do regularly publish consultation reports that clearly identify the key topics of discussions, comments and feedback received, and their decisions on the contributions.
5. To promote transparent and comprehensive participation, lead institutions should include in early consultations trade unions, organizations focusing on gender equality and the rights of persons with disabilities, and business associations in earlier stages in the policy development process.	Medium term	Not implemented	This recommendation as a whole is not implemented and it is further recommended for this monitoring cycle as well.

II.3.2 Recommendations from the 2024/2025 Monitor report

- Current reliance on ad-hoc invitations for CSO participation limits the diversity and transparency of stakeholder involvement in both the development and monitoring processes. It is recommended that the Ministry of Public Administration and Anti-Corruption, in collaboration with the Prime Minister's Office, adopt formal open call procedures to integrate CSOs as full members of oversight structures, a medium-term measure aimed at promoting a more inclusive and systematic approach.

- Inconsistent distribution of working materials, including meeting agendas, screening reports, and timelines, impairs stakeholders' ability to engage effectively. Responsible institutions, particularly the Department of Public Administration, should standardize and streamline the sharing of these documents via official channels, a medium-term initiative to enhance the clarity and accessibility of consultation information.

- Delays and insufficient detail in the publication of consultation feedback reduce the overall transparency and accountability of the process. It is recommended that the relevant agencies ensure that comprehensive consultation reports, with clear indications of individual comments, decisions, and justifications, are published online without delay. This is a short-term measure intended to improve stakeholder confidence in the feedback mechanism.

- To promote transparent and comprehensive participation, lead institutions should ensure that trade unions, business associations, and organizations focusing on gender equality and the rights of persons with disabilities are included in early stages of the policy development process, a medium-term effort promote transparent and comprehensive participation.

- Irregular scheduling of monitoring and coordination meetings, compounded by the nonfunctional Integrated Planning System (IPSIS), a confusing overlap of Prime Minister Orders amid continuous changes or restructuring of the monitoring mechanisms undermines effective oversight of PAR implementation. The Ministry of Public Administration and Anti-Corruption in cooperation with the Prime Minister's Office should clarify these mechanisms, mandate a regular meeting schedule (at least biannually), and invest in upgrading IPSIS to support real-time information sharing, a medium-term commitment to improving coordination.

- Absence of a dedicated online platform that consolidates all PAR planning documents, meeting minutes, and monitoring reports significantly restricts access to essential information. It is recommended that the Ministry of Public Administration and Anti-Corruption in cooperation with the Prime Minister's Office, establish and maintain such a platform, ensuring it is regularly updated, a medium-term effort critical for enhancing transparency in the PAR process.

METHODOLOGY APPENDIX

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

- Analysis of official documentation, data, and official websites

- Requests for free access to information

- Interviews with stakeholders and key informants.

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

Table 4. FOI requests sent in Albania

Institution	Date of request	Date of reply to the request
Prime Minister's Office	20.11.2024	No reply
Department of Public Administration	20.11.2024	10.12.2024
Ministry of Finance	20.11.2024	10.12.2024
Ministry of Internal Affairs	20.11.2024	16.12.2024
National Agency for Information Society	20.11.2024	10.12.204

Interviews with key informants were conducted and used as a base for point allocation for elements 1.8 and 2.7. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Interviews with other stakeholders (such as representatives of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.8 and 2.7 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather

than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table 5. Interviews conducted in Albania

Date	Interviewees
05.12.2024	Expert, part of academia
05.12.2024	Member of an CSO, expert in Public Administration Reform
11.12.2024	Member of an CSO, expert in Public Administration Reform

List of interview questions

- Element 1.8

    1. To what extent do you agree with the following statement: The development process of the PAR planning document was transparent.

        a. fully disagree

        b. tend to disagree

        c. tend to agree

        d. fully agree

    2. To what extent do you agree with the following statement: The development process of the PAR planning document was inclusive.

        a. fully disagree

        b. tend to disagree

        c. tend to agree

        d. fully agree

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

1. How are civil society organisations involved in the initial stages of developing PAR planning documents?

2. How transparent are the timelines, agendas, and outcomes of consultations during the development of the PAR planning documents?

3. How are feedback and contributions from different stakeholders documented and integrated?

4. How are key decisions made throughout the development of PAR documents, and are these decisions communicated clearly to all involved parties? (for example, decisions on adopting changes proposed by the non-state actors – specific measures, activities, and such)

5. Is there an opportunity for continuous feedback throughout the process?

6. Have there been instances where stakeholder input significantly impacted the development process of the planning process? Could you provide an example?

7. During the development of the PAR planning documents, did the responsible authorities implement different forms of consultations during the process (such as focus groups, surveys, interviews, submission of written contributions, etc.). If the answer is yes, please elaborate.

- Element 21.7

1. To what extent do you agree with the following statement: Materials for preparation for meetings of administrative structures are provided timely.
    a. fully disagree
    b. tend to disagree
    c. tend to agree
    d. fully agree

2. To what extent do you agree with the following statement: Materials for preparation for meetings of political structures are provided timely.
    a. fully disagree
    b. tend to disagree
    c. tend to agree
    d. fully agree

3. To what extent do you agree with the following statement: Meetings of administrative structures allow meaningful contribution.
    a. fully disagree
    b. tend to disagree
    c. tend to agree
    d. fully agree

4. To what extent do you agree with the following statement: Meetings of political structures allow meaningful contribution.
    a. fully disagree
    b. tend to disagree
    c. tend to agree
    d. fully agree

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

1. Do you feel that your organisation has a meaningful voice in the decision-making processes within the administrative and political structures? Please elaborate

2. Have there been instances where your organisation's input has led to changes or influenced outcomes? Please provide an example

3. How do you receive updates or feedback on how your organisation's contributions are utilised?

4. How would you assess communication within the structures and from heads of the structures in terms of effectiveness and timeliness?

5. How would you assess the transparency of the decision-making processes within the structures?

6. Do you believe that the coordination and monitoring structures could better support engagement and utilise civil society contributions? In which way

7. How would you assess the availability of information on PAR implementation and monitoring, i.e., how would you assess the online availability of relevant information?

List of referenced sources in this report

Code of Administrative Procedures in the Republic of Albania, https://qbz.gov.al/eli/ligj/2015/04/30/44

Decision No. 737, dated 13 December 2023

Draft Strategjia Ndërsektoriale për Reformën në Administratën Publike 2024-2030

Law 146/2014 on Notification and public consultation, https://qbz.gov.al/eli/ligj/2014/10/30/146

Lista Konsultimeve

National PAR Monitor Albania 2021-2022 Report, National PAR Monitor 2021/2022 - Albania - WeBER 3.0

Order no. 3, dated on 29.1.2021 for the Approval of the Public Consultation Process Roadmap, General Secretary, Prime Ministry of the Republic of Albania

Order of Prime Minister no.57, dated 24.4.2023

Order of Prime Minister no.76, dated 22.4.2022

Order of the Prime Minister no. 90, dated on 1.8.2023

Projektvendim "Për miratimin e Strategjisë Ndërsektoriale për Decentralizimin dhe Qeverisjen Vendore, 2023-2030, të Planit të saj të Veprimit dhe të Pasaportës së Treguesve"

Projektvendimi "Për miratimin e Agjendës Digjitale 2021+ dhe Planit të Veprimit 2021+

Public administration in Albania 2024, SIGMA, https://www.oecd.org/en/publications/public-administration-in-albania-2024_5577d117-en.html

PVKM "Per miratimin e Strategjise Sektoriale per Menaxhimin e Financave Publike 2023-2030"

RENJK_721_RaportKonsultativ.pdf

Risk Assessment Methodology (2018), Prime Ministry of the Republic of Albania, https://www.kryeministria.al/wp-content/uploads/2022/06/RIA-Metodologjia.pdf