

Independent Reporting Mechanism (IRM): Malta Transitional Results Report 2018– 2020

This report was prepared in collaboration with Soledad Gattoni, Independent Researcher

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I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their progress and determine if efforts have impacted people's lives.

The IRM has partnered with Soledad Gattoni, an independent researcher, to carry out this evaluation. The IRM aims to inform ongoing dialogue around the development and implementation of future commitments. For a full description of the IRM's methodology, please visit <https://www.opengovpartnership.org/about/independent-reporting-mechanism>.

This report covers the implementation of Malta's third action plan for 2018-2020. In 2021, the IRM will implement a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.¹ The IRM adjusted its Implementation Reports for 2018-2020 action plans to fit the transition process to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic's effects on OGP country processes.

¹ For more information, see: <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>

II. Action Plan Implementation

The IRM Transitional Results Report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not re-visit the assessments for "Verifiability," "Relevance" or "Potential Impact." The IRM assesses those three indicators in IRM Design Reports. For more details on each indicator, please see Annex I in this report.

2.1. General Highlights and Results

Malta's third action plan featured five commitments, covering the areas of inclusion, public service delivery, and mobile and blockchain technologies.¹ Only two out of five commitments were clearly relevant to OGP values, the same rate as the previous action plan (2015-2017).² The previous action plan saw two of five commitments reach substantial implementation (with the other three seeing limited completion). However, for the current action plan, the IRM was only able to establish that limited implementation occurred for three commitments.

The end of 2019 saw protests and a political crisis following the uncovering of alleged links between government officials and the assassination of investigative journalist Daphne Caruana Galizia. The resignation of Prime Minister Joseph Muscat led to Robert Abela becoming Prime Minister in January 2020. The subsequent government reshuffle and changes to ministries meant that the lead ministry for OGP in Malta, the Ministry for European Affairs and Equality, ceased to exist. Since then, there has been no permanent or temporary point of contact in the Maltese government to OGP, nor has a new ministry taken up responsibility for the OGP process in the country. Malta has also not established a dedicated multi-stakeholder forum to oversee the OGP process. Non-government stakeholders in Malta contacted by the IRM were mostly unaware of any implementation of the commitments, and the country lacks an online repository to track commitment progress. Thus, there was insufficient evidence for the IRM to ascertain whether any commitments led to early results or changes in government practice.

In February 2020, OGP's Criteria & Standards Subcommittee placed Malta under a procedural review for having been found acting contrary to OGP process for two consecutive action plan cycles.³ Due to the lack of response to this procedural review, a group of five civil society organisations (CSOs) in Malta sent an open letter in June 2021 to the Prime Minister, requesting the government establish a multi-stakeholder forum for OGP and urging it to recommit itself to OGP.⁴ At the time of writing this report (September 2021), the government has not responded to this letter, and no progress has been made to begin co-creating a new action plan.

For Malta, there is clear room for improvement in several open government areas, including journalistic freedom, civic space, open data, and whistleblowing. From 2017 to 2020, Malta fell more than 30 places in Reporters Without Borders' World Press Freedom Index.⁵ In 2019, CIVICUS considered civic space in Malta "narrowed", noting that civil society believed that the authorities have failed to ensure justice for journalist Daphne Caruana Galizia, two years after her assassination.⁶ Although Malta launched a national open data portal in 2019, the 2020 European Open Data Maturity Report placed the country in the "Follower" category (at rank 31 out of 35 countries).⁷ In addition, as of January 2021, Malta has not started the process to transpose the EU's 2019 whistleblowing directive into national legislation.⁸

2.2. COVID-19 Pandemic impact on implementation

In response to the COVID-19 pandemic, Malta imposed a mandatory quarantine on travelers and those who were in contact with others who traveled abroad.⁹ From April 2020 onwards, when cases rose to 52, the government imposed a mandatory lockdown on those over the age of 65 and/or suffering from chronic health conditions. The government adapted restrictions to freedom of assembly over the course of 2020 by limiting and imposing fines for breaking the restrictions on the total number of people allowed to gather in public spaces.¹⁰ One year later, Malta has reported more than 34,000 confirmed cases and 423 deaths.¹¹ The vaccination process is in progress with

more than 70 percent of the Maltese population fully vaccinated against the virus.¹² However, it is unclear how the pandemic has affected implementation of the action plan, and there is no information available for the IRM to assess how the pandemic has changed OGP priorities in the country or affected engagement with CSOs.

¹ Open Government Partnership, IRM Malta Design Report 2018-2020, https://www.opengovpartnership.org/wp-content/uploads/2019/11/Malta_Design_Report_2018-2020.pdf

² Open Government Partnership, IRM Malta End-of-Term Report 2015-2017, https://www.opengovpartnership.org/wp-content/uploads/2018/10/Malta_End-of-Term_IRM-Report_2015-2017.pdf

³ Open Government Partnership, Malta Letter Under Review, https://www.opengovpartnership.org/wp-content/uploads/2020/02/Malta_Letter_Under-Review_February2020.pdf

⁴ These included the Daphne Caruana Galizia Foundation, the aditus foundation, SOS Malta, Integra Foundation, Kopin and Repubblika, <https://www.daphne.foundation/documents/letters/ogp-letter.pdf>

⁵ Reporters Without Borders, A long road to justice, <https://rsf.org/en/taxonomy/term/150>

⁶ Civicus, Monitor, Tracking Civic Space, Malta, <https://monitor.civicus.org/updates/2019/10/01/malta-overview/>

⁷ Open data maturity 2020, Malta, https://data.europa.eu/sites/default/files/country-factsheet_malta_2020.pdf

⁸ Polimeter, Malta, <https://www.polimeter.org/en/euwhistleblowing/promises/4292deae-3ed8-47db-b14b-6ef74e1ac637>

⁹ Times of Malta, As it happened: Lockdown for 118,000 people, <https://timesofmalta.com/articles/view/live-coronavirus-updates.781001>

¹⁰ EU Fundamental Rights Agency, Coronavirus pandemic in the EU – Fundamental Rights Implications, 3 November 2020, https://fra.europa.eu/sites/default/files/fra_uploads/mt_report_on_coronavirus_pandemic_november_2020.pdf

¹¹ Health.gov.mt, Novel coronavirus - English, <https://deputyprimeminister.gov.mt/en/health-promotion/Pages/Novel-coronavirus.aspx>

¹² Malta COVID-19 vaccination, <https://vaccin.gov.mt>

2.3. Early results

In 2015 the IRM introduced the ***Did it Open Government?*** variable in order to measure results and outcomes from commitment implementation. This variable looks at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. The IRM acknowledges that results may not be visible within the two-year time frame of the action plan and that at least a substantial level of completion is required to assess early results.

This section highlights early results from noteworthy commitments or commitments that have been assessed by the IRM as having “substantial” or “complete” implementation, and being relevant, verifiable, and transformative. This criteria ensures the IRM is able to capture results from commitments that were ambitious in design, while also capturing results from commitments that were successfully implemented but may have lacked clarity in their original design.

None of the commitments from Malta's third action plan met the aforementioned criteria for inclusion in this section. Due to the lack of available evidence, the IRM could only establish that limited implementation took place for three commitments and could not determine if any opened government or saw early results. As noted in Section 2.1, the Ministry for European Affairs, which led the OGP process, ceased to exist following changes in government and Malta did not maintain an online repository for the action plan. In addition, non-government stakeholders in Malta contacted by the IRM were largely unaware of any progress towards completing the commitments. See Section 2.4 for an overview of the implementation of all commitments in the action plan.

2.4. Commitment implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

Commitment	Completion: <i>(no evidence available, not started, limited, substantial or complete)</i>
I. Bridging the Gap through M-Government	<p>No evidence available</p> <p>The commitment was part of the Digital Malta Strategy 2014-2020, an existing initiative aimed to provide national policy direction on ICT initiatives, and addresses topics such as infrastructure, digital business and digital government.¹ The commitment called for introducing new mobile applications for wider access to services. However, it lacked verifiable activities, making it difficult for the IRM to assess the level of implementation.</p> <p>The government has not reported any mobile applications that were made available and the CSOs consulted by the IRM stated they were not aware of any advancement on this commitment.² To the contrary, civil society pointed to examples of the government restricting access to (company register) data over the course of the implementation period.³ Although the Government of Malta maintains a webpage dedicated to the 2014-2020 Digital Malta Strategy, it does not provide information on any specific activities carried out during the action plan period (2018-2020) that would help the IRM ascertain the level of completion of this commitment.⁴</p>
2. “Integration = Belonging”	<p>Limited</p> <p>The commitment was based on a pre-existing portfolio, the “Integration = Belonging: Migrant Integration Strategy & Action Plan”, confirmed in June 2017.⁵ Specific activities included developing integration and language courses for migrants, introducing cultural mediators, and conducting awareness-raising campaigns (such as the procedures to apply for permanent residence status or how to enrol in language courses).</p> <p>Despite the vagueness of the milestones, the IRM was able to determine that the commitment saw limited completion. However, it is not clear if, to what extent, or how, the Inter-Ministerial Committee on Integration was strengthened. While the milestone on engagement of officials on immigration was not clear either, the government highlighted the Local Integration Charter and Action Plan (which support local officials and councilors to oversee the implementation of the charter and integrate migrants) that launched with participation from Cospicua, Msida, Mtarfa, Pembroke, Sliema, San Pawl il-Bahar and Birkirkara local authorities.⁶</p> <p>The Ministry for Equality, Research & Innovation stated that between 2018 and 2020, there were 2662 applications for the integration and language courses, with 346 graduating from Stage 1 and 79 from Stage 2.⁷ Applicants from at least 52 different countries completed the courses.⁸</p> <p>Additionally, an awareness-raising campaign with cultural mediators for the “I Belong” programme was planned. However, a full evaluation of the impact is yet to be published and there is no evidence available that shows if officials whose duties focus on immigration were involved in the programme. According to the “I Belong” programme, the Ministry for European Affairs and Equality (MEAE)’s Integration Unit was tasked to develop quarterly reports on implementation</p>

	<p>progress and generate annual progress reports to be presented at subsequent Annual Integration Conferences.⁹ Following the dissolution of MEAE in 2020, it is unclear if these quarterly or annual reports were published. Moreover, the CSOs consulted by the IRM stated they were not aware of any advancement on the implementation of this commitment but that the government had launched an advertising campaign called “Malti Bhalek” (“Maltese like you”) aimed at changing perceptions of race and nationality.¹⁰ There is no evidence to suggest improvements to the OGP value of citizen participation through this commitment.</p>
<p>3. Investing in Technology</p>	<p>Limited</p> <p>This commitment aimed to a) create a Blockchain Lab and a Blockchain Hub within the Malta Information Technology Agency (MITA) to support startups working on blockchain technology (particularly in education); b) train civil servants working on education certificates; c) raise awareness of blockchain technology among civil servants and the general public, and d) create a Gozo Innovation Hub.</p> <p>The new Gozo Innovation Hub was inaugurated on 8 November 2019.¹¹ The hub aims to help new companies set up and operate successfully in Gozo. Malta’s budget for 2018 allocated funds to create a Blockchain Lab and to promote a Blockchain Startup Hub, both under MITA.¹² However, the IRM could not find information on MITA’s webpage to ascertain if the Hub and Lab were eventually established.¹³ The IRM was also unable to determine if any trainings for civil servants on educational certificates or awareness raising on blockchain technology for civil servants took place. Therefore, the IRM considers this commitment to have seen limited implementation overall.</p> <p>From the IRM’s email exchanges with CSO representatives, there is no evidence to show further advancement on this commitment and they stated that blockchain initiatives appear to have been abandoned by the new Abela government.¹⁴ Moreover, according to the Crypto Law Insider project, despite promises made two years ago by the office of the Prime Minister of Malta about becoming the first blockchain and crypto hub, most of the blockchain projects got stuck in “uncertain regulatory limbo, unable to do business and uncertain of their legal status”.¹⁵</p>
<p>4. Upgrade the Department for Industrial and Employment Relations</p>	<p>Not started</p> <p>This commitment aimed to strengthen the accessibility of services at the Department for Industrial and Employment Relations (DIER) by improving its IT system, implementing the Quality Service Charter and refurbishing its office space.</p> <p>The government has not reported any advancement in this commitment and the CSOs consulted by the IRM were not aware of any progress towards its implementation.¹⁶ The IRM could not find any information on DIER’s webpage on improvements to its IT systems or on implementing the Quality Service Charter. A tender for office space refurbishment at 108 Melita Street in Valletta was published on 4 March 2021, after the end of the action plan cycle,¹⁷</p>
<p>5. Strengthen Local Government and the Commission for Domestic Violence in Malta</p>	<p>Limited</p> <p>This commitment had two main objectives: a) strengthen the role of the Commission for Domestic Violence in Malta, which was originally set up in 2006, and b) bring local councils closer to citizens.</p> <p>According to IRM desk research, the White Paper on the Local Government reform was published for public consultation in October 2018, and the government published a response analyzing citizens’ feedback in January 2019.¹⁸ However, there is no evidence to establish if the government considered the feedback proposed by citizens in reforming local government.</p>

	<p>The commitment called for allocating more resources to the Commission for Domestic Violence. A survey of Malta's approved annual budgets shows that the budget allocated to the Commission for Domestic Violence was the same for 2018 and 2019 (EUR 150,000).¹⁹ In 2020, the allocated budget grew to EUR 270,000, and a separate budget for gender-based and domestic violence programmes grew from EUR 50,000 to 75,000 from 2019 to 2020. Therefore, the IRM considers the commitment to have limited completion.</p> <p>The government has not officially shared any advancement report on this, nor on any other commitment, and the CSOs consulted by the IRM were not aware of any progress either.²⁰ There is no evidence to suggest improvements to the OGP value of citizen participation through this commitment.</p>
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¹ Digital Malta, National Digital Strategy 2014-2020, <https://digitalmalta.org.mt/en/Documents/Digital%20Malta%202014%20-%202020.pdf>

² IRM researcher email exchange with Matthew Caruana Galizia, Daphne Foundation, 28 July 2021.

³ Daphne Caruana Galizia Foundation, Online access to company data should be reinstated, <https://www.daphne.foundation/en/2020/10/08/disappearance-of-data>

⁴ Digital Malta, <https://digitalmalta.org.mt/en/Pages/Home.aspx>

⁵ Integration = Belonging, Vision 2020, <https://meae.gov.mt/en/Documents/migrant%20integration-EN.pdf>

⁶ <https://ec.europa.eu/migrant-integration/news/local-integration-charter-launched-in-malta>

⁷ Email response to IRM, Michael Cluett, Ministry for Equality, Research & Innovation, 1 October 2021.

⁸ European Commission, I Belong, Malta's national integration programme, <https://ec.europa.eu/migrant-integration/intpract/i-belong-maltas-national-integration-programme>

⁹ Integration = Belonging, Vision 2020, <https://meae.gov.mt/en/Documents/migrant%20integration-EN.pdf>

¹⁰ IRM researcher email exchange with Matthew Caruana Galizia, Daphne Foundation, 25 August 2021.

¹¹ Gozo Innovation Hub, <https://www.gozoinnovationhub.com/>

¹² IFC, Malta aims to be a Blockchain Trailblazer, <https://www.ifcreview.com/news/2017/october/malta-aims-to-be-a-blockchain-trailblazer/>

¹³ Mita, Our Digital Future, <https://mita.gov.mt/>

¹⁴ IRM researcher email exchange with Matthew Caruana Galizia, Daphne Foundation, 25 August 2021.

¹⁵ Crypto Law Insider, The Maltese Deception: The Crypto hub that never came to be, <https://cryptolawinsider.com/the-maltese-deception-the-crypto-hub-that-never-came-to-be/>

¹⁶ IRM researcher email exchange with Matthew Caruana Galizia, Daphne Foundation, 28 July 2021.

¹⁷ Etenders.gov.mt, <https://www.etenders.gov.mt/epps/cft/listContractDocuments.do?resourceld=7383685#> see Tender Document: CT2096 2021 tender document.pdf

¹⁸ Public Consultations, White Paper on the Local Government reform, https://meae.gov.mt/en/Public_Consultations/MJCL/Pages/Consultations/WhitePaperontheLocalGovernmentReform.aspx

¹⁹ Ministry for Finance, The Budget 2019, <https://finance.gov.mt/en/the-budget/pages/the-budget-2019-g5j3dl.aspx>

²⁰ IRM researcher email exchange with Matthew Caruana Galizia, Daphne Foundation, 28 July 2021.

III. Multi-stakeholder Process

3.1 Multi-stakeholder process throughout action plan implementation

In 2017, OGP adopted the OGP Participation and Co-Creation Standards intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP's Articles of Governance also establish participation and co-creation requirements a country or entity must meet in their action plan development and implementation to act according to the OGP process. Malta **acted contrary** to OGP process during the third action plan.¹ Malta did not meet the following standards:

- Reach “involve” during the development of the action plan,
- Reach “inform” during the implementation of the action plan,
- Collect, publish and document a repository on the national OGP website/webpage in line with IRM guidance.

Please see Section 3.2 for an overview of Malta's performance implementing the Co-Creation and Participation Standards throughout the action plan implementation.

Table [3.2]: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) “Spectrum of Participation” to apply it to OGP.² In the spirit of OGP, most countries should aspire to “collaborate.”

Level of public influence		During development of action plan	During implementation of action plan
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.		
Involve	The government gave feedback on how public inputs were considered.		
Consult	The public could give inputs.	✓	
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		✓

There was no multi-stakeholder forum and no consultations with stakeholders took place during the implementation period of the third action plan. In addition, Malta did not maintain a dedicated online repository to track the progress of the commitments. In early 2020, the Ministry for European Affairs and Equality was dissolved following a change in government leadership. Since then, there has been no permanent or temporary government point of contact to OGP, and no new ministry has taken over responsibility for overseeing the OGP process in Malta.

¹ Acting Contrary to Process - Country did not meet (1) “involve” during the development or “inform” during implementation of the action plan, or (2) the government fails to collect, publish and document a repository on the national OGP website/webpage in line with IRM guidance.

² “IAP2’s Public Participation Spectrum,” IAP2, 2014,

https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf

3.2 Overview of Malta's performance throughout action plan implementation

Key:

Green= Meets standard

Yellow= In progress (steps have been taken to meet this standard, but standard is not met)

Red= No evidence of action

Multi-stakeholder Forum	During Development	During Implementation
1a. Forum established: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red	Red
1b. Regularity: There is no evidence of a permanent multi-stakeholder forum and there is no evidence that stakeholders met or were consulted during implementation of the third action plan.	Red	Red
1c. Collaborative mandate development: This was assessed in the Design Report.	Red	N/A
1d. Mandate public: There is no public mandate as Malta does not have a permanent multi-stakeholder forum.	Red	Red
2a. Multi-stakeholder: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red	Red
2b. Parity: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red	Red
2c. Transparent selection: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red	Red
2d. High-level government representation: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red	Red
3a. Openness: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red	Red
3b. Remote participation: There is no evidence of opportunities for remote participation in the OGP process.	Red	Red
3c. Minutes: There is no evidence that the government proactively communicates or reports back on its decisions, activities, and results to wider government and civil society stakeholders.	Red	Red

Key:

Green= Meets standard

Yellow= In progress (steps have been taken to meet this standard, but standard is not met)

Red= No evidence of action

Action Plan Implementation	
4a. Process transparency: There is no evidence of regular updates (i.e., at least every six months) on the progress of commitments, including progress against milestones, reasons for any delays, next steps. The government also did not produce a self-assessment report for the third action plan.	Red
4b. Communication channels: There is no evidence of specific communication channels for the OGP process in Malta.	Red
4c. Engagement with civil society: There is no evidence the government held open meetings with civil society to discuss implementation of the action plan.	Red
4d. Cooperation with the IRM: There is no evidence that the government shared the link to the IRM report with other government institutions and stakeholders to encourage input during the public comment phase.	Red
4e. MSF engagement: There is no evidence that Malta has a permanent multi-stakeholder forum to oversee the OGP process.	Red
4f. MSF engagement with self-assessment report: There is neither a self-assessment report nor evidence of a multi-stakeholder forum in Malta.	Red
4g. Repository: There is no evidence that Malta maintains an online public OGP repository in line with IRM guidance. ¹	Red

¹ Open Government Partnership, IRM Guidance for Online Repositories, https://www.opengovpartnership.org/wp-content/uploads/2015/11/IRM_Guidance-for-Repositories_Updated_2020.pdf

IV. Methodology and Sources

Research for the IRM reports is carried out by national researchers. All IRM reports undergo a process of quality control led by IRM staff to ensure that the highest standards of research and due diligence have been applied.

The International Experts Panel (IEP) of the IRM oversees the quality control of each report. The IEP is composed of experts in transparency, participation, accountability, and social science research methods.

Current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual¹ and in Malta's 2018-2020 Design Report.

About the IRM

The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.



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¹ IRM Procedures Manual, V.3, <https://www.opengovpartnership.org/documents/irm-procedures-manual>

Annex I. IRM Indicators

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.¹ A summary of key indicators the IRM assesses is below:

- **Verifiability:**
 - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
 - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are:
 - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
 - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
 - Public Accountability: Will the government create or improve public facing opportunities to hold officials answerable for their actions?
- **Potential impact:** This variable assesses the *potential impact* of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
 - Identify the social, economic, political, or environmental problem;
 - Establish the status quo at the outset of the action plan; and
 - Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

Results oriented commitments?

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment design is one that clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., 'Misallocation of welfare funds' is more helpful than 'lacking a website.')
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., "26 percent of judicial corruption complaints are not processed currently.")?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment's implementation (e.g., "Doubling response rates to information requests" is a stronger goal than "publishing a protocol for response.")?

Starred commitments

One measure, the “starred commitment” (★), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries/entities. To receive a star, a commitment must meet several criteria:

- The commitment’s design should be **Verifiable, Relevant** to OGP values, and have **Transformative** potential impact. As assessed in the Design Report.
- The commitment’s implementation must be assessed by IRM Implementation Report as **Substantial** or **Complete**.

This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

¹ “IRM Procedures Manual,” OGP, <https://www.opengovpartnership.org/documents/irm-procedures-manual>