PAR Monitor Report Montenegro
STRATEGY FOR PUBLIC ADMINISTRATION REFORM

2024/2025

CONTENTS:

AUTHORS

Dragana Jaćimović
Bojana Pravilović

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.

ACKNOWLEDGEMENTS

The Strategy for PAR Montenegro 2024/2025 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 Montenegro, and other stakeholders in Montenegro 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), and the Ministry of Public Administration in Montenegro, as a project associate.

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[1] A joint initiative of the European Union and the OECD.

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 2 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]

The results of this monitoring cycle showed less inclusiveness of the PAR planning documents development process compared to the previous monitoring cycle. Public institutions failed to continue good practice of consultations during the early stage of development of analysed documents, as was the case for the PAR Strategy 2022-2026. Since the previous WeBER monitoring cycle, two new planning documents which are part of the PAR agenda have been adopted: Public Finance Management Reform Program 2022-2026 and Action Plan 2024-2025 for Digital Transformation Strategy 2022-2026. The public was excluded from participation in the early phase of drafting these documents since the consultations were not held for either of the two mentioned documents. Public debate was conducted during the development of the PFM Programme and satisfied almost all criteria regarding transparency and inclusiveness, except publishing the report on public debate.

CSOs in Montenegro remain members of the PAR Council, a political-level structure for PAR monitoring and coordination. Their selection was transparent through open call. Even though the PAR council held six sessions, the regularity cannot be confirmed due to the time between sessions. Looking at the CSO experience, two key informants agree that they are timely provided with the materials for the meeting, but on the other hand, the meetings do not allow meaningful discussion. In the mandate of the current PAR Council, CSOs do

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

not participate in any of the administrative structures dealing with monitoring and implementation of the PAR Strategy, even though during the monitoring period there was a formal possibility that administrative structures include them.

The work of the PAR Council is to a great extent transparent, with the fact that the minutes of the sessions are not published. Most of the documentation related to the work of the PAR Council, as well as strategic documents and reports on their implementation, are publicly available, but not in one place.

The recommendations from this monitoring cycle are focused on improving the inclusiveness of the development of strategic documents within the PAR agenda. When it comes to the work of PAR monitoring and coordination structures, responsible institutions are recommended to organise meetings in a way as to enable substantive discussions. Recommendations also suggest increased transparency, both in consultation processes and work of the monitoring structures.

LIST OF ABBREVIATIONS AND ACRONYMS

AP - Action Plan

CSO - civil society organization

EU - European Union

FOI – Freedom of Information

MPA - Ministry of Public Administration

PAR - Public Administration Reform

PFM – Public Financial Management

ReSPA - Regional School of Public Administration

SIGMA - Support for Improvement in Governance and Management

WeBER3.0 - Western Balkan Enablers for Reforming Public Administrations

I. WEBER PAR MONITOR: What we monitor and how?

I.1 WeBER's approach to monitoring PAR

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

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

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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/.

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

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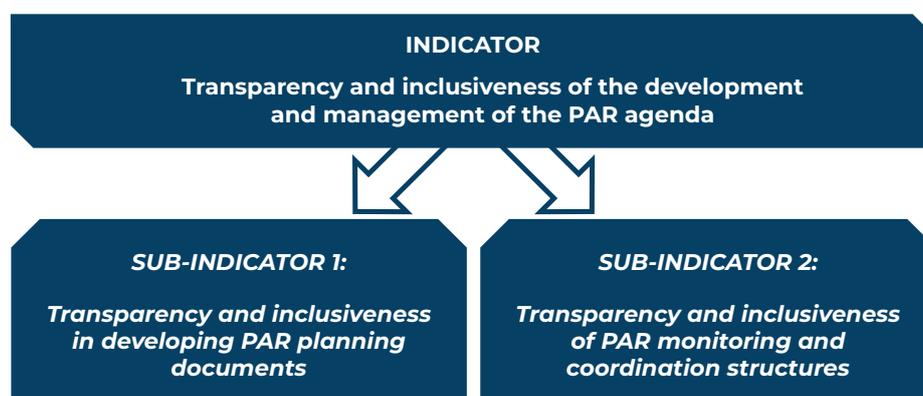
I.2 Why and how WeBER monitors the "Strategy for PAR" area

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.

INDICATOR
Transparency and inclusiveness of the development and management of the PAR agenda

SUB-INDICATOR 1:
Transparency and inclusiveness in developing PAR planning documents

SUB-INDICATOR 2:
Transparency and inclusiveness of PAR monitoring and coordination structures

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 Montenegro includes:

- *Public Finance Management Reform Program 2022-2026*
- *Action Plan 2024-2025 for Digital Transformation Strategy 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)

24	76

■ 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	4/5
E 1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation	1.5/9
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	1.5/6
E 1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation	0/9
E 1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation	0/9
E 1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation	4/10
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		**11/60**

Since the previous WeBER monitoring cycle, two new planning documents which are part of the PAR agenda have been adopted: Public Finance Management Reform Program 2022-2026[6] and Action Plan 2024-2025 for Digital Transformation Strategy 2022-2026[7], under the jurisdiction of the Ministry of Finance and Ministry of Public Administration. Consultations were not held for either of the two mentioned documents, while a public debate was held for the Public Financial Management Reform Program 2022-2026. The public consultation was not accompanied by a publicly available report and instead, the report could only be obtained through a request for free access to information.

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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.

[6] Public Finance Management Reform Program 2022-2026, available at: https://bit.ly/3WPNExH

[7] Action Plan 2024-2025 for Digital Transformation Strategy 2022-2026, available at: https://bit.ly/411LcXh

Moreover, early consultations were not organised for both Public Finance Management Reform Program and Action plan for Digital Transformation Strategy. Additionally, no formal working groups have been formed regarding preparation of these documents. The Government of Montenegro adopted the Public Finance Management Reform Program at the 33rd Government session in December 2022, while the Action Plan for 2024 and 2025, which accompanies the Digital Transformation Strategy 2022-2026, was adopted in July 2024. In April 2024, the Government of Montenegro formed a Working Group for Monitoring the Implementation of the Public Finance Management Reform Program 2022-2026.[8] Within this Working Group, four teams have been formed in line with the strategic objectives of the Program: for Strengthening the Fiscal Framework and Budget Planning, Budget Execution, Accounting, Monitoring, and Financial Reporting, and for Financial Control. This Working Group consists of 60 members and aims to monitor the implementation of the Program.

According to the responses received from the Ministry of Public Administration, even though there was no formal working group or early consultation for the AP, they included relevant external stakeholders in the drafting process. At the beginning of the process of drafting the new Action Plan for the Digital Transformation Strategy 2022-2026, mini teams were formed, composed of members of the Coordination Body for managing the digital transformation process and relevant representatives with extensive experience in the field of digital transformation. This was done to ensure the creation of Action Plan activities that will contribute to the ultimate implementation and comprehensive digital transformation of society as a whole.[9]

On the other hand, a public debate was held for one of the documents, namely the Public Finance Management Reform Program.[10] The invitation for the public debate, along with supporting documentation, was published on the website of the ministry in charge, as well as on the e-Government portal, on its public debate section. According to the Decree, the competent ministry is

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[8] Information on the formation of the Working Group for Monitoring the Implementation of the Public Finance Management Reform Program 2022-2026, with a proposal for a Decision on the formation of the Working Group, April 2024, available at:
https://wapi.gov.me/download-preview/c253c2b3-fc56-4b56-8c9e-074214f3b31a?version=1.0

[9] Comments on the calculation sheet submitted by the Ministry of Public Administration via e-mail, January 2025.
All relevant parties involved in the process: Chamber of Commerce of Montenegro, Association of Managers of Montenegro, Employers' Union of Montenegro, AmCham Montenegro, Association of Banks of Montenegro, University of Montenegro, ICT Cortex, Union of Municipalities, as well as relevant ministries.

[10] Public debate on the Draft Public Finance Management Reform Program 2022-2026, available at: https://www.gov.me/clanak/javna-rasprava-o-nacrtu-programa-reforme-upravljanja-javnim-fi-nansijama-za-period-2022-2026-godine
E-Government Portal: https://eusluge.euprava.me/eParticipacija/Item/?Id=768

obligated to publish a report within 15 days following the public debate. This report must include the proposals and suggestions of all interested parties, along with an explanation of why they were accepted or not. For the Public Finance Management Reform Program, the consultation process during the initial preparation phase was omitted, while the public debate was conducted for 20 days. Nevertheless, a report on the conducted debate was not published neither on the website of the institute nor the e-Government portal, but provided to us through a FOI request[11] submitted to the Ministry of Finance. According to this report, only one CSO participated in the public debate and all other participants were from state administration.

How does Montenegro do in regional terms?

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

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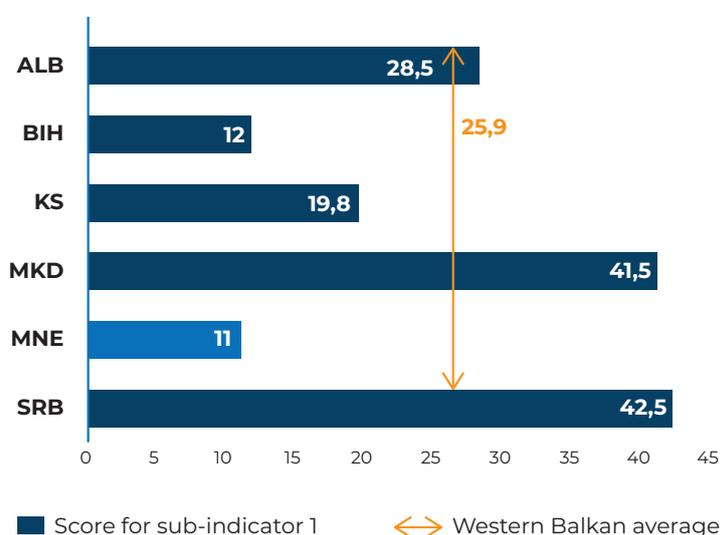
[11] Decision, Ministry of Finance, December 2, 2024.

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[12]

Indicator elements	Element type	Score
E 2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy	1/2
E 2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	0/3
E 2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	3/3
E 2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional setup	2/4
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	5/10
E 2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact	2/8
Total score for sub-indicator 2		**13/40**

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[12] 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.

CSOs in Montenegro remain included in the PAR Council, a political-level structure for PAR monitoring and coordination. During the monitoring period, PAR Council held six sessions, but the regularity of the sessions cannot be confirmed. In the mandate of the current PAR Council, CSOs do not participate in any of the administrative structures dealing with monitoring and implementation of the PAR Strategy. Although there are several structures for monitoring and implementation at administrative level, the European Commission noted that at administrative level coordination is lacking. Additionally, it was noted that dialogue with non-governmental stakeholders on the PAR agenda is underdeveloped, and Montenegro does not have a central online platform that would allow public and non-governmental stakeholders to regularly monitor progress achieved.[13]

The Council for Public Administration Reform has the key role in managing and coordinating the reform. PAR Council, as a political structure, includes two representatives of non-governmental organizations, participating as full-fledged members. They are selected based on a public call and in accordance with the regulation on the CSOs participation in decision-making processes.[14]

The monitoring period for two previous years (2023 and 2024) covered two different compositions of the PAR Council. The previous mandate of the PAR Council started in October 2022. Later, by the Government's Decision from July 2023, the mandate of one representative from the non-governmental organizations ended due to its resignation. After the establishment of the new 44th Government of Montenegro in October 2023, the Government announced a public call[15] through which a one missing representative from the CSO sector was selected. The PAR Council continued its work with changes in its personnel structure, with two CSO representatives. The composition of the PAR Council was extended in December 2023, when the Council accepted a request of the Association of Montenegrin Managers to join the Council.

During the monitoring period, starting from November 2022, the PAR Council had six sessions: two sessions in November and December 2022; Council have met twice during 2023 (on May 5 and December 26) and twice in 2024 (on April 29 and December 16). Having in mind that regularity is interpreted to mean that meetings were held once in every six months, and that in two cases we had 6+ months between sessions, this element is awarded with zero points. The Ministry of Public Administration indicated that parliamentary elections were

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[13] European Commission, Montenegro Report 2024, page 24.

[14] Decree on the selection of NGO representatives in the state administration working bodies and the conducting of public consultations for preparation of laws and strategies (Official Gazette of Montenegro, 041/18)

[15] Public call for NGO representative availiable here: https://www.gov.me/clanak/javni-poziv-za-predlaganje-jednog-predstavnika-ce-nvo-za-clana-savjeta-za-reformu-javne-uprave

held in June 2023, which affected the dynamics of the Council's work. Namely, the sessions could not be held because a new Government was constituted in October 2023, which caused a change in the structure of the Council itself.[16]

Key informants agree that they are timely provided materials to prepare for meetings of the PAR Council, but on the other side, they point out that these meetings do not allow meaningful contribution.[17] In more details, key informants explained that discussion is limited since there is not enough time to discuss documents during the sessions. One key informant stressed that "It seems like we just "run" over the items on the agenda. We cannot say that we are allowed to contribute substantially and affect the core of the PAR reform."[18]

In the mandate of the current PAR Council, CSOs do not participate in any of the administrative structures dealing with monitoring and implementation of the PAR Strategy. When it comes to the administrative level, it is important to note that this PAR Strategy envisaged several structures for monitoring the implementation of the PAR Strategy (Ministry of Public Administration and the intergovernmental operational team). Additionally, within the PAR Council, six coordination structures have been established, which function as administrative structures. In accordance with the Decision on the Establishment of the Coordination Team for the Implementation of Public Administration Reform from July 2024[19] representatives of non-governmental organizations are not members of these administrative coordination bodies.[20] The Decision states that, at the invitation of the coordinator of the coordination bodies, and for the purpose of more efficiently performing the established tasks and activities of the coordination bodies, members of the PAR Council who are not representatives of state bodies or public administration authorities may join the meetings.

It is important to note that, during the short period there was a formal possibility that administrative structures include CSO representatives. Since this practice has not taken root, it cannot be considered that there has been an improvement in this part. The previous convocation of the PAR Council formally included

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[16] Comments of the Ministry of Public Administration on the Calculation sheet for the Strategy area.

[17] Two NGO members of the PAR Council „fully agree "that they are timely provided materials, and both of them „fully disagree" that meetings of political structures allow meaningful contribution.

[18] Interview with NGO representative, member of the PAR Council.

[19] Decision on the Establishment of the Coordination Team for the Implementation of Public Administration Reform from July 2024(available at: https://www.gov.me/dokumenta/75f88162-dbd9-412a-b5b6-e20a2b21e0ba)

[20] Six coordination bodies: Coordination Body for the Civil Service System in Public Administration; Coordination Body for the Organization and Functioning of Public Administration; Coordination Body for Transparency and Openness in Public Administration Operations; Coordination Body for Service Development and Delivery; Coordination Body for the Local Self-Government System; Coordination Body for Strategic Planning.

CSOs in those coordination teams, but only one meeting in 2023 was held with the participation of one CSO representative. The current composition of the PAR Council also changed the way it functions at the administrative level. Before the Decision on coordination team in July 2024 was published, there was an Information on the organization of the PAR Council from January 2024 where it was stated that each of six coordination administrative structures includes at least one NGO representative, which is also a member of the PAR Council.[21] During these six months, there were no meetings of these structures. Although there were some attempts to include NGO representatives in the administrative structures, this does not enable their regular and substantive participation, this criterion received zero points.

When it comes to the communicating work of PAR monitoring and coordination structures, the key address is the official website of the Government. Within the internet presentation of the Ministry of Public Administration, there is a dedicated section for public administration reform (available at: https://www.gov.me/mju/reforma-javne-uprave). This section contains all relevant documents which are up to date, such as the Public Administration Reform Strategy with its Action Plan in both Montenegrin and English, as well as reports on the implementation of the Action Plan for the Strategy for 2022 and 2023. This section does not include other strategic documents within the PAR Agenda, such as PFM Programme and Digital Transformation Strategy.

Work of the PAR Council is also presented within the separate section within the MPA's website (https://www.gov.me/vlada-crne-gore/savjet-za-reformu-javne-uprave). This section provides information only about the sessions held and the materials discussed during those sessions. On the other hand, there is no specific section just for the documents. Decisions on composition of the Council, as well as rules of procedure can be found only through the search of the "library". There are no published meeting minutes from the PAR Council.

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[21] Information on the organization and functioning of the Council for Public Administration Reform https://www.gov.me/en/documents/36502010-765b-48f2-89f6-4480e85f7c8d

How does Montenegro do in regional terms?

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

■ Score for sub-indicator 2	⟷ Western Balkan average
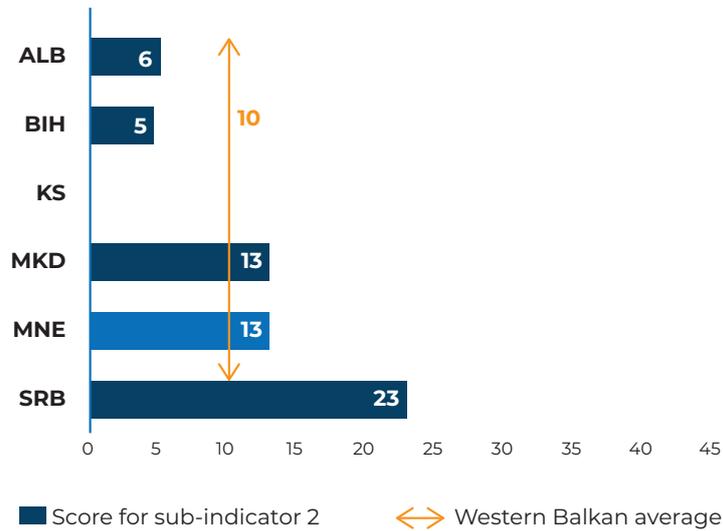
Overall scores comparison in the Strategy for PAR

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

■ Total indicator score	⟷ Western Balkan average
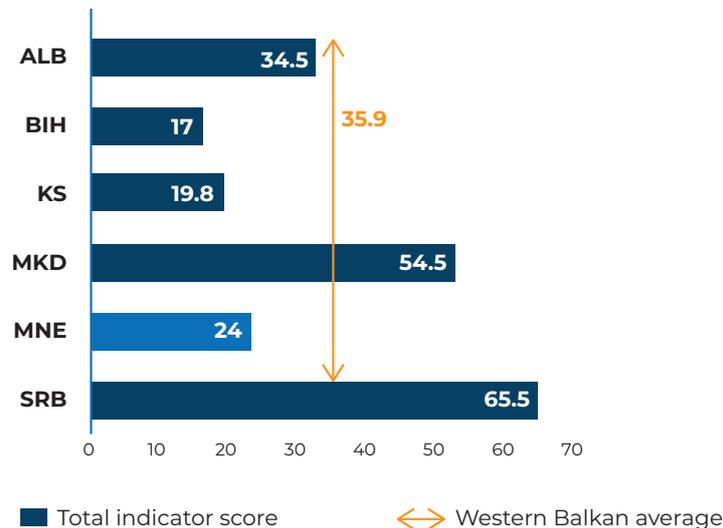
Regional overview report for Strategy area, with results for all WB administrations is available at: www.par-monitor.org

II.3 Recommendations for the Strategy for PAR

II.3.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

Recommendations	Type*[22]	Status**	Explanation
The process of public consultations in preparation of key PAR strategic documents and their regular or ad hoc amendments should be showcases of best practices on how to organise a comprehensive, inclusive and open participation of the public in policy-making.	Long term	Partially implemented	Best practices on how to organise public participation in decision-making processes is not common for all documents within the PAR Agenda. There was no public consultations for the PFM Programme, public debate was conducted but the report was not published.
Transparency of the sessions of the PAR Council should be ensured by inviting media to attend and report on it.	Short term	Not implemented	The meetings were not open for the media, although a press release followed them.
The PAR Council should open up its sessions beyond NGO representatives that are its members, and invite representatives of CSOs to present their views on particular elements of the PAR process that is on the agenda.	Short term	Not implemented	There has been no change, either in practice or in the Rules of Procedure.
The PAR Council must have on its agenda legal acts that deal with crucial segments of the PAR process (e.g. Civil Service Law, Law on State Administration, etc.) and discuss the proposals as well as make sure that they are in line with PAR Strategy goals.	Short term	Partially implemented	PAR Council discussed bills such as draft Law on the Government and amendments to the Law on free access to information, but according to key informants due to the lack of time these meeting do not allow meaningful discussion.

*short term/mid-term/long term
**implemented/partially implemented/not implemented

_____
[22] Recommendations for which the time needed for implementation is deemed to be up to one year are labeled as short term. Medium-term recommendations are those which can be implemented in a period from one year up to three years. Long-term require more than three years to be implemented.

Recommendations	Type* [23]	Status**	Explanation
The PAR Council should deliberate on independently produced reports of NGOs and international organisations dealing with topics from its jurisdiction.	Medium-term	Not implemented	In the monitoring period, such materials were not on the agenda of the Council.
The PAR Council should avoid the practice of adopting technical conclusions related to documents on its agenda, which are in the remit of the General Secretariat of the Government, but use this instrument to provide meaningful contribution to the PAR process and evidence-based guidance to the Government.	Short-term	Not implemented	There has been no change, either in practice or in the Rules of Procedure.
The PAR Council must clarify its Rules of Procedure when it comes to voting on conclusions, which should be done publicly by members, with results included in minutes, reports and press releases, that must also include minority opinions and objections to conclusions that were put forward by Council members. The PAR Council must also define its position regarding whether it is its role to formally adopt (endorse) official reports, which is currently ambiguously applied.	Short-term	Not implemented	There has been no change, either in practice or in the Rules of Procedure.

*short term/mid-term/long term
**implemented/partially implemented/not implemented

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[23] Recommendations for which the time needed for implementation is deemed to be up to one year are labeled as short term. Medium-term recommendations are those which can be implemented in a period from one year up to three years. Long-term require more than three years to be implemented.

II.3.2 RECOMMENDATIONS FROM THE 2024/2025 MONITOR REPORT

- Best practice on how to organise public participation in decision-making processes is not common for all documents within the PAR Agenda. The process of public consultations in preparation of key PAR strategic documents and their regular or ad hoc amendments should be showcases of best practices on how to organise a comprehensive, inclusive and open participation of the public in policy-making. (long-term)

- Monitoring showed that even when the public debates were conducted, a report with feedback on suggestion and comments was not published. All responsible institutions should act according to the legal framework on consulting CSOs and publish reports on conducted public consultations/ debates thus providing adequate feedback for those who participated in the process. (medium-term)

- Transparency of the sessions of the PAR Council should be ensured by inviting media to attend and report on it. (short-term)

- There is no up-to-date section with PAR planning documents and monitoring reports on the implementation of PAR Agenda, since the specific section on PAR does not include documents such as PFM Programme or Digital Transformation Strategy. Website presentation with the Ministry of Public Administration should be improved in a manner to include all strategic documents within the PAR agenda. Also, transparency in communicating PAR monitoring should be increased by publishing minutes from the sessions. (short-term)

- The PAR Council should open up its sessions beyond NGO representatives that are its members, and invite representatives of CSOs to present their views on particular elements of the PAR process that is on the agenda. (short-term)

- Meetings of the PAR Council during the monitoring period did not allow meaningful discussion and participation of the CSOs due to time-limitation of the session. Meetings of the PAR Council should be organised in a way to provide enough time for discussion of the items on agenda. (short-term)

- The PAR Council must clarify its Rules of Procedure when it comes to voting on conclusions, which should be done publicly by members, with results included in minutes, reports and press releases, that must also include minority opinions and objections to conclusions that were put forward by Council members. The PAR Council must also define its position regarding whether it is its role to formally adopt (endorse) official reports, which is currently ambiguously applied. (short-term)

METHODOLOGY APPENDIX

For producing this report for Montenegro], 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 Montenegro

Institution	Date of request	Date of reply to the request
Ministry of Public Administration	18.10.2024.	30.10.2024.
Ministry of Finance	18.10.2024.	25.11.2024.

Interviews with key informants were conducted and used as a base for point allocation for elements 1.8 and 2.7. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored 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 Montenegro

Date	Interviewees
26.11.2024.	Key informant 1 - CSO representative member of the PAR Council
26.11.2024.	Key informant 2 - CSO representative member of the PAR Council

List of interview questions

- **Element 1.8**

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

   a. fully disagree

   b. tend to disagree

   c. tend to agree

   d. fully agree

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

   a. fully disagree

   b. tend to disagree

   c. tend to agree

   d. fully agree

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

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

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

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

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

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

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

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

- **Element 2.7**

1. To what extent do you agree with the following statement: **Materials for preparation for meetings of administrative structures are provided timely.**

   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

Action Plan 2024-2025 for Digital Transformation Strategy 2022-2026 - https://bit.ly/411LcXh

European Commission, *Montenegro Report 2024.*
Available at: http://bit.ly/3WMRI1U

Government Website - https://www.gov.me/mju/reforma-javne-uprave

National PAR Monitor 2021/2022 Montenegro - https://bit.ly/3Q4gC9d

Public Finance Management Reform Program 2022-2026 - https://bit.ly/3WPNExH

Strategy for Public Administration Reform in Montenegro 2022-2026 - https://bit.ly/3Q57t0b