

د ادارې فساد پر وړاندې د څارنې او ارزونې
خپلواکه او گډه کمیټه



کمیټه مستقل مشترک نظارت و ارزیايي مبارزه
علیه فساد ادارې

INDEPENDENT JOINT ANTI-CORRUPTION
MONITORING AND EVALUATION COMMITTEE

NINTH SIX-MONTH REPORT (July 1, 2015 - December 31, 2015)

February 2016



The official version of this report, including any corrections, is available on the MEC website: www.mec.af

Cover photo: MEC's first university outreach session (November 2015, American University of Afghanistan).



INDEPENDENT JOINT ANTI-CORRUPTION
MONITORING AND EVALUATION COMMITTEE (MEC)

Despite campaign promises by both leaders to prioritize the fight against corruption, there are significant and increasing concerns about the ability of the National Unity Government (NUG) – after more than one year in power – to effectively address issues related to corruption, let alone other critical areas, such as security or employment. Combined with a continued decrease in international assistance, a spike in emigration through both legal and illegal means, and a rapidly weakening currency, optimism about Afghanistan’s future is at a low not seen in many years.

In November, the appearance of a high level government authority on stage with one of the two main convicted criminals behind the Kabul Bank scandal highlighted the challenges to fighting corruption in Afghanistan. Many saw the government as complicit in allowing a convicted criminal to sign a contract as a partner in the multi-million dollar Smart City Project, despite their proclamations that his involvement was simply to help him pay back money he owed as part of his conviction.

Regarding MEC’s work, during the reporting period MEC published four vulnerability to corruption assessments (VCAs) covering the Wasaeq registration process; teacher recruitment at the Ministry of Education (MOE); the E-Tazkira Authority; and the Education Quality Improvement Program (EQUIP) at the MOE. The VCA on the E-Tazkira Authority was MEC’s first VCA carried out at the request of the President. MEC also released its Eighth Six-Month Report and a short paper analyzing the NUG’s 100-day plans in September. Two months later, MEC released its Report on Selected Foreign Assistance Programs.

MEC’s nascent Outreach Team began its operations during this period as well, establishing two provincial anti-corruption working groups (PAWGs) in Herat and Balkh in late 2015. They also held three university outreach sessions in Kabul, Kandahar and Nangarhar.

With the President’s approval of two new international Committee Members in late 2015, MEC is well-positioned to continue its work into 2016 with a full Committee and a diverse portfolio of ongoing projects, covering such areas as tax collection, public-health services, and fuel importation. MEC remains hopeful that progress in fighting corruption is still possible in Afghanistan, even with the numerous political, social, economic, and security challenges facing the country. However, with confidence in the NUG at a much lower level than one year ago and a thriving insurgency, the government is quickly running out of time to show concrete efforts and the necessary political will to turn around the country’s fortunes.

Respectfully,

Dr. Shaukat Hassan
MEC Committee Chair

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1 MEC MISSIONS



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MEC Committee meets with Supreme Audit Office staff during the 17th MEC Mission (September 2015).

MEC MISSIONS

Mission 17: September 2015

This fall, MEC's governing Committee held its 17th mission in Kabul, meeting with senior officials from the Afghan government and international community. The Committee reviewed numerous internal papers, and approved several for public release. Towards the end of the mission, MEC held a press conference on the release of the Eighth Six-Month Report and the Review of NUG 100-Day Plans.



The MOI 119 Call Center Director and MOI Acting Inspector General brief the Committee on the 119 process and corruption-related cases.

During this mission, the Committee met with the U.N. Special Representative of the Secretary-General (SRSG) for Afghanistan, the Director of the Afghanistan Investment Support Agency (AISA), and the General Director of the Supreme Audit Office (SAO). The Committee also discussed the recruitment process at the Afghanistan Telecommunication Regulatory Authority (ATRA), the sim-card registration process, and the procurement of equipment for producing e-tazkiras, with the Minister of Communications and Information Technology. The National Procurement Authority Director also briefed the Committee on the status of the Procurement Law, blacklisted companies, and their ongoing reforms. Other meetings were held with Deputy Ministers of the Ministry of Labor, Social Affairs, Martyrs and Disabled (MOLSAMD), a Deputy Director of the Administrative Office of the President (AOP), and the acting Ministry of Interior (MOI) Inspector General, among others.

The Committee finalized and approved seven reports for public release, and reviewed and commented on the following internal papers and ongoing projects:

1. MOLSAMD VCA on international work permits;
2. Report on corruption in Ministry of Higher Education (MOHE) construction projects in Kandahar;
3. MOI 119 Complaint Hotline Report;
4. VCAs on the six building blocks of the Ministry of Public Health (MOPH): service delivery; workforce; information systems; access to essential medicine; financing; and leadership and governance;
5. Transitioning Control of Afghanistan's Air Space;
6. Analysis of Pashtany and Milli Banks;
7. Analysis of the Self-Reliance through Mutual Accountability Framework (SMAF) paper; and
8. Corruption in the Afghan Sports Community.

MEC MISSIONS

The following seven reports were approved by the Committee during this mission for public release:

1. Review of NUG 100-Day Plans (published September 17)
2. VCA on the E-Tazkira Authority (published October 21)
3. Report on Selected Foreign Assistance Programs (published November 8)
4. VCA on the EQUIP Program at the Ministry of Education (published November 21)
5. Report on World Food Programme (WFP) Food Initiatives at the MOE (published November 21)
6. Conflicts of Interest Report (published December 9)
7. VCA on Municipality Revenue Collection (to be published in early 2016)

Additionally, the Committee tasked the Secretariat to begin a long-term research project on the analysis of governmental revenue streams.

2 MONITORING & EVALUATION



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Afghan students learning English. MEC published reports and issued recommendations for the MOE related to project reporting and food distribution during the reporting period. Photo credit: Staff Sgt. Marcus J. Quarterman (July 2007).

Monitoring and Evaluation Tool: New Recommendations

Based on MEC's VCAs and research reports published in the second half of 2015, MEC issued new recommendations on the following topics:

- Increasing transparency in the hiring process for teachers at the MOE;
- Improving oversight of NUG 100-Day Plans;
- Auditing contracts related to the E-Tazkira Authority;
- Developing an accurate reporting system for the EQUIP program;
- Inspecting corruption cases related to MOE food distribution projects;
- Developing an national electronic procurement system; and
- Publicizing recipients of governmental contracts.

The current status of all MEC recommendations can be found in the M&E Tool Annex at the end of this report.

Review of NUG 100-Day Plans

In September, MEC released its report analyzing the NUG's 100-Day Plans. These plans provide encouraging evidence that some Afghan ministries are beginning to integrate anti-corruption measures into their standard operating procedures. But these documents, too, are flawed, often lacking details and sometimes setting unrealistic short-term objectives.

Earlier in 2015, President Ashraf Ghani instructed all ministries and independent budgetary departments to prepare 100-Day Plans describing how they intended to improve provision of services to the people and implement internal reforms to improve the efficiency of their operations. All 25 ministries were required to submit 100-Day Plans, as were several other independent agencies. Despite repeated written and verbal requests, however, MEC did not receive Plans from all of these institutions. As of mid-August, 18 ministries and four other agencies had provided MEC with their Plans. Of the Plans received by MEC, many were short (e.g., the Ministry of Women's Affairs (MOWA) presented a 2-page Plan), with the longest being the 24-page document produced by the Ministry of Counter-Narcotics (MOCN). With regard to addressing corruption issues, only six of the 22 Plans analyzed by MEC contain a specific anti-corruption section, but most of the other Plans include procedural reforms that, if implemented, could reduce corruption. Although the 100-day benchmark is arbitrary in nature and not a particularly useful metric to evaluate policies that may take years to bear fruit, the drafting of such Plans provides a useful, if limited, view of a ministry's priorities over the short term. Notably absent from the list of respondents were the Ministries of Interior and Defense, as well as the Independent Directorate of Local Governance (IDLG).

After reviewing the 22 Plans provided to MEC, several common deficiencies were readily apparent in many of the Plans:

- a failure to outline implementation mechanisms necessary for achieving the desired goals;
- insufficient detail about most initiatives described in the Plans;
- a general lack of prioritization;
- an unclear relationship between the Plans and the ministries' current resources and future budgets;
- a lack of monitoring and evaluation to track the progress of the Plans;
- unrealistic, short-term goals and overly ambitious timeframes; and
- a failure to directly address MEC's recommendations.

MEC will continue to follow the performance of these institutions in implementing their 100-Day Plans.

[www.mec.af/files/2015_09_17_100-Day_Plans_Review_\(English\).pdf](http://www.mec.af/files/2015_09_17_100-Day_Plans_Review_(English).pdf)



MEC Committee Member Dr. Yama Torabi (center) describes the main findings of MEC's Eighth Six-Month Report at a press conference that also covered MEC's analysis of the NUG 100-Day Plans (September 2015).

Review of Selected Foreign-Assistance Programs

In November, MEC released its Review of Selected Foreign-Assistance Programs implemented in Afghanistan. In this report, MEC examined 14 projects funded by five different donors covering multiple sectors, ranging from road construction and prison reform to health care services and humanitarian assistance. With this report, MEC hoped to provide donors and the government with a sampling of some of the best—and some of the more problematic—aid practices and, therefore, contribute to the wider discussion on foreign-assistance programs.

Since the overthrow of the Taliban, international donors have pledged more than USD119 billion in foreign assistance to Afghanistan. Fourteen years later, most of the population still requires humanitarian assistance, a dependency facilitated by weak government institutions. Aid programs could have significantly improved local livelihoods had they been better planned, executed, and coordinated with the Afghan government and other donors. MEC found that assistance was too often driven by donor priorities, instead of responding to Afghan requirements and needs.

MEC identified the following factors as most obstructive to the effective use of external aid:

- a lack of uniform aid-effectiveness indicators;
- complex delivery processes;
- high overhead and indirect costs;
- largely off-budget support from international donors;
- a lack of capacity in Afghan ministries and employment turnover in those ministries;
- widespread corruption; and
- the unstable security situation.

For this review, MEC staff conducted interviews, desk research, document analysis and site visits. Our team interviewed government officials representing 14 ministries, representatives from civil-society organizations (CSOs), ordinary Afghan citizens and more than 30 individuals from various donor implementing partners.

Striking a balance between increased Afghan control and donor-managed oversight mechanisms that safeguard taxpayer funds against corruption is one of the major challenges ahead. MEC therefore recommended the following steps to improve aid effectiveness in Afghanistan:

- Improved leadership and management of development policy and strategy;
- Increased alignment of aid programs with national priorities and greater donor-government coordination;
- Reduced vulnerabilities to corruption in the aid-administration process;
- Improved alignment of foreign assistance with local needs;
- Improved donor-government monitoring and evaluation arrangements; and
- Increased “on-budget” assistance.

MEC will continue to follow this issue and monitor the implementation of the report’s recommendations.

[www.mec.af/files/2015_11_08_Review_of_Selected_Aid_Programs_\(English_Full_Report\).pdf](http://www.mec.af/files/2015_11_08_Review_of_Selected_Aid_Programs_(English_Full_Report).pdf)

Conflicts of Interest Paper

On December 9, International Anti-Corruption Day, MEC released its Conflicts of Interest paper that focused on high-ranking officials and the vulnerabilities of the procurement system. Numerous sources have reported that extensive embezzlement of state funds took place under the previous administration, with the procurement system serving as one of the main avenues for siphoning off state funds. In perhaps the clearest example of a conflict of interest, large numbers of government officials controlled companies that did business with the state. These officials used their influence to secure contracts for their firms as well as for those controlled by their political allies.

When researching this paper, MEC staff uncovered numerous challenges, including the use of complex corporate arrangements (e.g., shell companies, subsidiaries, and so forth) to disguise ownership of companies; concerns about well-connected mafias who operate within many ministries and wish to limit the transparency of procurement operations; and the chaotic system of business registration that is prevalent (involving several different ministries), with no centrally accessible, reliable database available.

To address the aforementioned problems, this paper included recommendations to establish an effective and transparent electronic procurement system; to recruit procurement employees in a transparent process; to subject all new hires and existing personnel to a thorough background and vetting process; and to publish the identity of the contractors and owners of the mentioned companies.

[www.mec.af/files/2015_12_09_Conflicts_of_Interest_Paper_\(English\).pdf](http://www.mec.af/files/2015_12_09_Conflicts_of_Interest_Paper_(English).pdf)

3 LEGAL REFORM INITIATIVES



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The Afghan Parliament in 2006, by Ben - <http://gemini.info.usaid.gov/photos/displayimage.php?pos=-472>. Licensed under Public Domain via Commons - https://commons.wikimedia.org/wiki/File:Afghan_parliament_in_2006.jpg#/media/File:Afghan_parliament_in_2006.jpg

Draft Whistle-Blower Law

Described in detail in the Seventh and Eighth Six-Month Reports, MEC's draft Whistle-Blower Law was sent to the Parliamentarian Anti-Corruption Caucus (PACC) in June 2015 for their review. After addressing their initial concerns, a final draft law was sent to the PACC in late 2015 for consideration by the National Assembly.

This proposed law was drafted after extensive consultations with representatives of relevant government institutions and CSOs, as well as national and international experts. If passed in its current form, it would ensure the safety of whistle-blowers, protecting them from recrimination, and establish rules for the adjudication of whistle-blower complaints.

Draft Administrative Procedures Law

In early 2015, MEC staff began a review of the draft Administrative Procedures Law, which clarified the steps a citizen must take to challenge a government decision. MEC submitted its formal comments on the draft to the Ministry of Justice (MOJ) in September 2015, which included, among others, the following recommendations to improve the law:

- Clarify the powers of the Independent Administrative Reform and Civil Service Commission (IARCSC) to reprimand, punish, or otherwise correct the actions of other Afghan agencies that violate the provisions of the draft law.
- Further define terms and phrases that appear to prohibit conflicts of interest.
- Define more explicitly what constitutes a decision “taken against common procedures” or taken “contrary to the public customs and interests.”
- Provide significantly more information about when, how, and why a decision can remain confidential. As it stands, exceptions such as national security are too broad and subject to abuse.
- Define what constitutes an “emergency” that would allow a government official to make a decision that would not be in writing.
- In addition to any contractual penalties, clarify whether any additional sanctions can be imposed on government agencies that do not fulfill their obligations under a duly enacted contract with a private-sector entity.
- Provide clear limitations regarding the circumstances in which a public official can provide only an oral description of a document. Otherwise, this provision seems likely to be abused to shield certain documents from release.

4 VULNERABILITY TO CORRUPTION ASSESSMENTS



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MEC's Executive Director and VCA Team Leader present the process of the MOPH VCA to directors and other senior staff at the MOPH (November 2015).

Wasaeq VCA

On August 11, MEC released its second VCA on the judicial system. This VCA examined the process of Wasaeq registration, which refers to the certification or registration of 45 different types of official documents. During the course of this VCA, MEC identified a range of vulnerabilities, many of which are due to a failure to observe laws and regulations, poor inter-institutional coordination among Afghan government stakeholders, and significant human-resource and technical-capacity deficiencies.

Furthermore, MEC once again encountered a lack of cooperation from some of the Supreme Court related offices. But with the cooperation of the General Directorate of Wasaeq Registration (GDWR), MEC was able to collect most of the information it required to complete this VCA.

Wasaeq procedures are complex, consisting of numerous discretionary transactions, every one of which provides a corruption opportunity for GDWR staffers, court officials, and other interested parties. The land-registration process alone consists of 30 different steps, many of which could be easily consolidated. And while there is a general lack of uniformity in how the different Wasaeq procedures are applied, several common themes emerged, including:

- the GDWR has little, if any, presence at the provincial level, where civil-court judges conduct most Wasaeq-related processes;
- provincial courts issue Wasaeq certifications and send them directly to the Supreme Court, ignoring the GDWR;
- most Wasaeq processes consist of repetitive steps;
- Wasaeq documentation is easily forged;
- people seeking to obtain Wasaeq documents do not know, or are confused about, the steps involved in registering their documents; and
- database management is irregular, with no coordination between the GDWR and the courts.

The issue of poor database management was cited by several informed sources as one of the primary reasons why upwards of 80,000 Wasaeq records were erroneously erased. In addition, the GDWR does not have its own budget or tashkil allotments consistent with its legal responsibilities. Consequently, the GDWR cannot discharge its mandate and more powerful institutions in the courts can encroach upon its work.

Given that many of the problems identified by the VCA Team are due to the blatant undermining of mandates, rules, and regulations, MEC recommended a comprehensive inquiry into the Wasaeq process to identify management weaknesses, establish accountability mechanisms, and reduce the number of discretionary transactions associated with Wasaeq registration.

[www.mec.af/files/2015_08_11_Wasaeq_VCA_\(English\).pdf](http://www.mec.af/files/2015_08_11_Wasaeq_VCA_(English).pdf)

VULNERABILITY TO CORRUPTION ASSESSMENTS

MOE Teacher Recruitment VCA

On August 22, MEC released a VCA on the teacher recruitment process at the MOE. All phases of the teacher-selection process, from the needs assessment to the examination and selection phases, are marred by deep-rooted nepotism and bribery. The corruption found in the MOE's process of teacher recruitment in this VCA raised serious doubts about the Ministry's oversight and accountability mechanisms, as well as its commitment to fair and equal education for all.

Based on consultations with a diverse array of stakeholders in Kabul, Herat, Nangarhar, Balkh, Badakhshan, and Laghman provinces, MEC found that, notwithstanding the legal requirement for teachers to have completed the 14th grade and passed a national teaching skills examination, approximately 46% of teachers do not meet these requirements. In 2014, out of 9,000 successful candidates who passed the teacher recruitment exam, only 1,800 could be hired due to a surplus of retired teachers who were still employed.

Additionally, Provincial Educational Directorates (PEDs) and Members of Parliament (MPs) often block teachers' appointments even after they have been approved by the MOE, or extract bribes for allowing appointments to go through without interference. In Badakhshan, audits of the PED uncovered flagrant misuse of the educational budget, while in Herat members of the Surkhpushan football team were recruited as teachers by the PED. Legal loopholes allowing for these special appointments and temporary contracts significantly undermine the competitive recruitment process for teachers.

While internal auditors at the MOE and the Supreme Audit Office (SAO) are aware of most of these issues, no action has been undertaken to solve the deficiencies. To counteract these fraudulent practices and prevent a further descent into corruption, MEC recommended that the MOE immediately focus on three courses of action. First, the MOE must ensure that only individuals who have passed the competitive examination are appointed. Second, the MOE should improve the integrity and transparency of the competitive examination process by modernizing it through unique test-taker identification numbers and computerized testing. Third, the MOE should draft a plan to eliminate the selection of teachers based on personal relationships.

[www.mec.af/files/2015_08_22_MOE_Teacher_Recruitment_VCA_\(English\).pdf](http://www.mec.af/files/2015_08_22_MOE_Teacher_Recruitment_VCA_(English).pdf)



MEC's Executive Director and VCA Team Leader present findings of the MOE Teacher Recruitment VCA at a press conference in Kabul (August 2015).



MEC's press conference on the release of the VCA on the E-Tazkira Authority (October 2015).

E-Tazkira Authority VCA

On October 21, MEC released its VCA on the national Electronic ID, or E-Tazkira, Authority. Corruption concerns related to employee recruitment in this department led MPs, civil-society leaders, and others, to express their reservations about this endeavor. Consequently, President Ashraf Ghani asked MEC to investigate the recruitment process and major contracts in this project. This is the first VCA considered, and carried out, at the request of the President. The MEC delegation met with several stakeholders, including the International Organization for Migration (IOM), MOI and Ministry of Communication and Information Technology (MOCIT), to define the scope of the project and collect information on recruitment and contracting processes.

MEC examined the legal framework, administration, employee-recruitment process, major contracts, procedures, and practical mechanisms of the E-Tazkira Authority. Among the problems MEC identified were a lack of written procedures for recruitment; a tendency to ignore the Civil Service Law in the recruitment process; and interference in the process by powerful individuals from the government, parliament, and elsewhere. Additionally, the E-Tazkira Authority's lack of attention to the implementation of procurement laws, rules, and regulations exposed the project to corruption. MEC's three main findings concerned the improper recruitment of approximately 70% of the authority's staff; problems with the contracts signed with Grand Technology Resources (GTR) and the Orange Group; and deficiencies with the eligibility process.

Furthermore, political and ethnic challenges have had negative effects on the implementation process, resulting in significant delays. The Afghan leadership has been promising to commence the distribution process for three years, and multiple Presidential Decrees and decisions of the Council of Ministers have been issued in furtherance of this goal, but ultimately, distribution was stopped by the President's verbal orders.

To address the deficiencies identified in this report, MEC recommended that the administrative structure and HR procedures of the E-Tazkira Authority be reformed by introducing a transparent, competitive, and merit-based hiring process, and that the USD 101 million IT contract with GTR be audited by an independent third party. Establishing a proper recruitment process for staff of this department and ensuring proper contracting processes are followed are necessary steps in ensuring the support and acceptance of this project by the citizens of Afghanistan.

[www.mec.af/files/2015_10_21_E-Tazkira_VCA_\(English\)_v3.pdf](http://www.mec.af/files/2015_10_21_E-Tazkira_VCA_(English)_v3.pdf)

VULNERABILITY TO CORRUPTION ASSESSMENTS

EQUIP VCA and Report on WFP Food Initiatives

On November 21, MEC released a VCA and a separate report that both focused on donor-funded projects at the MOE: The Education Quality Improvement Program (EQUIP) operated by the World Bank and the Afghanistan Reconstruction Trust Fund (ARTF); and WFP's food-distribution initiatives.

Despite spending more than half a billion U.S. dollars on the EQUIP program over more than ten years, MEC found many instances of wasted funds, poor planning, inadequate oversight, illegal interference, fraud, and improper recruitments, in all components and phases of the program.

The VCA highlighted specific areas for improvement, including financial management, planning, and budgeting, and recommended that the program develop a quarterly reporting system to provide an accurate picture of its progress and achievements, which should be immediately addressed since the program is currently operating and has planned activities extending into 2017.

In addition to the EQUIP program, the report on WFP's food-distribution initiatives highlighted the problems with donor-funded projects that extend into provinces and districts where oversight is difficult due to insecurity and corrupt local officials. Much of the waste in these WFP initiatives occurred simply because local officials could act with impunity, misappropriating aid before it could get to its intended beneficiaries, enabling fraud in the contracting processes, or falsifying the existence of donor-funded councils or construction projects.

The report recommended that the MOE conduct an inspection of the food distribution process in its offices and directorates, covering the period of 2002 – 2013, to identify corrupt individuals and refer such cases to the Attorney General's Office (AGO).

[www.mec.af/files/2015_11_21_EQUIP_VCA_\(English\).pdf](http://www.mec.af/files/2015_11_21_EQUIP_VCA_(English).pdf)

[www.mec.af/files/2015_11_21_MOE_Food_Report_\(English\).pdf](http://www.mec.af/files/2015_11_21_MOE_Food_Report_(English).pdf)

Upcoming VCAs

During the next reporting period, the VCA Team plans to release four new VCAs on the following topics:

- **Municipal Revenue Collection:** This VCA looks at the various issues municipalities face attempting to collect tax revenue and the effect these issues have on service delivery.
- **International Work Permit Issuance:** Based on a request by the Minister of MOLSAMD, this VCA analyzes the process for issuing work permits for foreign workers in Afghanistan. Preliminary findings indicate that coordination problems and the lack of appropriate policies and procedures are hindering the process.
- **Importation and Distribution of Fuel and Gas:** This VCA will focus on the business aspects of the importation and distribution of items such as petrol and natural gas.
- **Six Building Blocks of the MOPH:** This VCA, also being conducted at the request of the Minister, focuses on the six so-called "building blocks" of the ministry: service delivery; workforce; information systems; access to essential medicine; financing; and leadership and governance.



MEC staff discuss the MOPH VCA process with the MOPH Deputy Minister for Policy (November 2015).

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COMMUNICATIONS & OUTREACH



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Students and faculty at Nangarhar University listen to MEC presentations during MEC's third university session (December 2015).

Communications

From July 1, 2015 to December 31, 2015, MEC issued eight press releases that addressed the following subjects:

August 8, 2015: MEC to Assess Process for Investigating and Prosecuting Elimination of Violence Against Women (EVAW) Cases

This press release announced the launch of a comprehensive VCA to be conducted on the justice sector's handling of EVAW cases. MEC held consultation meetings with CSOs, government officials, and academics to identify vulnerabilities in the process of adjudicating EVAW cases. The stakeholders highlighted several areas that contribute to the lack of proper protections for women involved in EVAW cases, including discriminatory attitudes towards women, a lack of relevant government personnel assigned to such cases, and interference by high-level officials.

August 11, 2015: MEC Releases Second Report Critiquing Vulnerabilities to Corruption in Afghanistan's Troubled Justice Sector

Following the VCA on Corruption Case Tracking released in April 2015, this press release detailed MEC's second VCA on the judicial sector. This VCA covered the process of Wasaeq registration, which refers to the certification or registration of 45 different types of official documents. The VCA recommended a comprehensive inquiry into the process due to unnecessarily complex procedures, poor database and record management, and the numerous discretionary transactions identified.

August 22, 2015: Corruption in Teacher Recruitment at the Ministry of Education

This press release described how deep-rooted corruption is within all phases of the MOE's teacher recruitment process. Based on research and interviews held in six provinces, MEC found that almost half of all teachers do not possess the basic, legal requirements to be teachers, as well as significant misuse of teacher appointments and educational budgets.

September 17, 2015: Uneven Results in the Fight Against Corruption

In conjunction with a press conference held on the same day on the release of MEC's Eighth Six-Month Report and Review of NUG 100-Day Plans, this press release detailed the efforts and failures of the NUG in their fight against corruption. It also highlighted the current implementation status of all of MEC's 380 recommendations, finding a significant increase in recommendations classified as "fully implemented."

October 21, 2015: MEC Finds Significant Recruitment Issues in its VCA on the E-Tazkira Authority

At the request of the President of Afghanistan, MEC conducted a VCA on the E-Tazkira Authority, with a focus on its employment and procurement processes. This press release described the main problems identified during the VCA process, including questionable contracts signed with two vendors, and the improper recruitment of roughly 70% of the staff employed at the Authority.

November 8, 2015: MEC Publishes Review of Selected Foreign Assistance Programs in Afghanistan

This press release described MEC's Report on Selected Foreign Assistance Programs, which examined 14 projects funded by five different donors. MEC found that assistance was too often driven by donor priorities, and identified many recurring factors that led to the ineffective use of aid funds.

November 21, 2015: MEC Releases Two Reports Highlighting Mismanagement of Donor Funds at the MOE

Summarizing the findings of the VCA on the EQUIP Program and report on WFP's food initiatives – both related to the MOE – this press release highlighted the problems donor-funded programs face when attempting to extend the reach of their activities into areas where it is not possible to ensure proper monitoring.

December 9, 2015: MEC Marks Anti-Corruption Day with Series of Events

This press release described MEC's activities in the week leading up to International Anti-Corruption Day. These activities included the release of the Conflicts of Interest report and two outreach events: the inauguration of MEC's first provincial anti-corruption working group (PAWG) in Herat, and MEC's second university outreach session, held at Kandahar University.

Outreach Programs

During the reporting period, MEC hired three full-time outreach professionals to manage its provincial and university outreach programs. Both programs have seen significant achievements, despite only being in operation for a few months.

Provincial Outreach

As described in the Eighth Six-Month Report, MEC established its provincial outreach program to expand its presence outside of Kabul by partnering with existing CSOs or CSO networks that are engaged in issues related to anti-corruption. The goal of establishing such groups is to support sub-national efforts to fight corruption by strengthening ties with and providing support to provincial-based CSOs. Parwan was the first province to be selected due to its proximity to Kabul, and after three meetings with CSOs and government officials, representatives of 80 CSOs elected 11 representatives to be the initial members of the Parwan PAWG. Due to some unexpected delays, this PAWG has not yet been inaugurated.

Despite being the second province selected, the Herat PAWG was the first to be inaugurated. Following an initial visit by MEC's outreach staff, MEC's Executive Director and other staff visited Herat in early December and along with Herat CSO Network Director Khalil Parsa and Herat Provincial Governor Mohammad Asif Rahimi, inaugurated MEC's first PAWG in a ceremony held on December 6.

Also in December 2015, MEC held two official visits to Mazar-e-Sharif: the first to meet with civil society activists and government officials to discuss the possible creation of a PAWG in Balkh; and the second to hold several coordination meetings and to inaugurate the PAWG. This is MEC's second such group, following the establishment of the first in Herat in early December 2015.

In 2016, MEC's Outreach Team plans to focus on creating PAWGs in Helmand, Kandahar, Nimroz, Samangan, and Logar, among others.



The Herat Provincial Governor poses with MEC staff and Herat PAWG members following the Herat PAWG Inauguration Ceremony (December 2015).

University Outreach

Given Afghanistan's youthful demographics, MEC's other outreach focus is on universities. The first university selected as part of MEC's university outreach was the American University of Afghanistan (AUAF). In early November, MEC's Executive Director and VCA Team Leader gave two presentations to AUAF students on MEC and its activities, and the recently-released VCA on the E-Tazkira Authority.

On December 8, MEC staff gave two presentations at Kandahar University on MEC's activities and the VCA on Pharmaceutical Importation. The event began with a speech by Dr. Hazrat Mir Totakhail, the university president, and was followed by presentations by MEC's Outreach Advisor and VCA Officer, which were given to an audience of about 100 students and faculty.

In late December 2015, MEC outreach staff traveled to Nangarhar to hold their third university outreach session. The session, attended by about 100 students and staff of Nangarhar University, was opened by the Student Affairs Director, and followed by presentations by MEC advisors about MEC's activities in general and VCAs on corruption in the higher education system. Following the presentations, students asked questions about corruption related to the E-Tazkira Authority, Kabul Bank, and the justice system.

In 2016, MEC's Outreach Team plans on holding university sessions at other universities in Kabul, as well as universities in Herat, Balkh, and Bamyan.



MEC and Nangarhar University presenters at MEC's university outreach session held at Nangarhar University (December 2015).

Media Events



MEC's press conference on the release of the Eighth Six-Month Report and Review of NUG 100-Day Plans (September 2015).

MEC held three press conferences in Kabul during the reporting period on the following topics:

1. Release of the VCA on Teacher Recruitment at the MOE, August 22, 2015.
2. Release of the Eighth Six-Month Report and Review of NUG 100-Day Plans, September 17, 2015.
3. Release of the VCA on the E-Tazkira Authority, October 21, 2015.

MEC's press conferences generated significant media interest from both national and international media. Leading Afghan media outlets such as 1TV, Tolo News, Radio Azadi, Pajhwok and Salam Watandar; international outlets including the BBC, Voice of America, and Reuters; and international organizations such as the United Nations and embassy staff are often in attendance.

MEC also held two press conferences, in Herat and Mazar-e-Sharif, to inaugurate the respective PAWGs established in these areas. Both events were widely covered by regional media outlets.

Social Media

MEC continues to build its social media presence, more than doubling the number of Facebook followers during the reporting period to approximately 47,000. Almost every week there are new Facebook posts, keeping all followers up to date on MEC's activities in English, Dari and Pashto languages. MEC's YouTube channel has been populated with videos of MEC's activities, including university sessions, PAWG inaugurations, and interviews with local media outlets. Currently there are more than 40 videos on MEC's channel. MEC's web site, www.mec.af, remains the main repository for all MEC reports and information. It receives thousands of hits and downloads every month, from users across the globe.

MEC Participates in Justice Sector Anti-Corruption Event

In mid-November, the Royal Danish Embassy to Afghanistan and U4 Anti-Corruption Resource Centre sponsored a two-day event in Kabul, entitled “Strengthening Anti-Corruption Reforms in the Afghan Justice Sector.” MEC’s Executive Director, VCA Team Leader, M&E Team Leader, and M&E Advisor were invited to the conference and gave detailed presentations on the “Overall Corruption Context in Afghanistan,” “Corruption Case Tracking and Kabul Bank Case,” and the “Way Forward in the Afghan Justice Sector.”

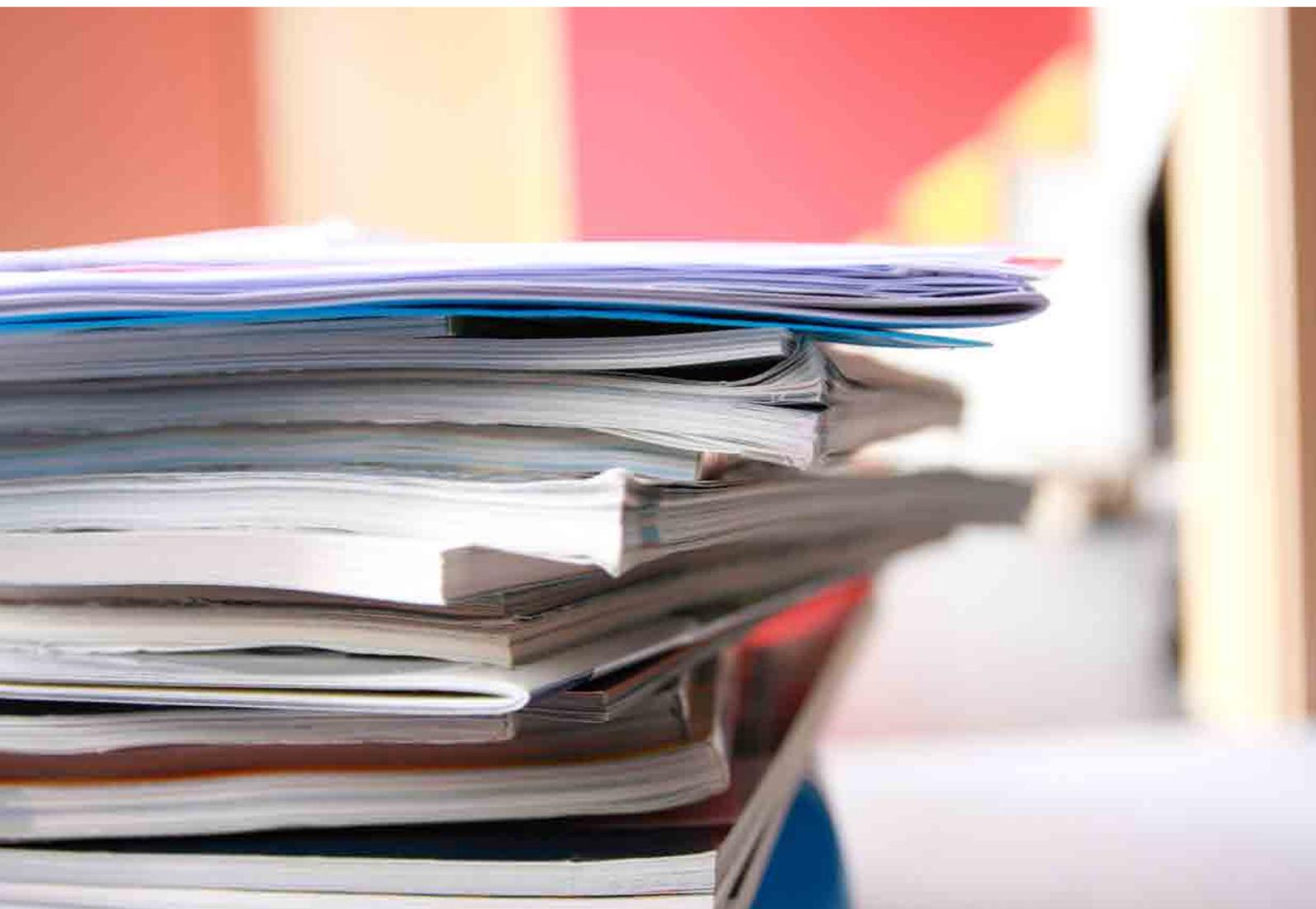


MEC’s Executive Director presents on the “Overall Corruption Context in Afghanistan” (November 2015).



MEC’s Advisors discuss new developments in the Kabul Bank case (November 2015).

6 ADMINISTRATION



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Human Resources

As of December 31, MEC's Secretariat employed 26 professionals – four full-time international advisors and 22 national personnel. For the MOPH VCA, MEC also hired one international and four national consultants for the duration of the project.

During the reporting period, a new international Senior Policy Advisor, a VCA Officer, and the entire Outreach Team - consisting of one advisor and two officers - were hired. Additionally, the Secretariat experienced an unusually high amount of turnover during this time with the resignations of its Executive Director, Senior Policy Advisor, Research Officer, and M&E Officer. The process for hiring a new Executive Director began in December 2015 and it is hoped a suitable candidate will be selected in early 2016.

In October, founding Committee Member Drago Kos resigned from MEC after serving for more than four years. Two new Members were approved by President Ghani in late 2015 to replace Mr. Kos and Mme. Eva Joly, who resigned earlier in 2015. The two new Members, Dr. Mark Pyman and Dr. Slagjana Taseva, will participate in their first MEC mission in February 2016, at which time the Committee will be fully staffed with six Members.

On November 1, Dr. Shaukat Hassan took over as Committee Chair, replacing Dr. Yama Torabi. Based on the presidential decree that established MEC, the Chair is rotated every six months between an international and Afghan Member.

Financial Report

MEC continues to be supported by its two primary donors, DFID (UK) and DANIDA (Denmark). Additionally, during the reporting period, the Norwegian government provided its first tranche of funds in support of MEC. In 2016, MEC also expects to begin receiving funding from USAID.

In early 2016, MEC will also undergo a comprehensive review of its activities and future plans to create a three-year strategic plan that will guide its operations and funding until 2018. This plan will provide more clarity and focus to MEC's activities and reports, and integrate operations more closely with governmental and foreign anti-corruption initiatives.

7 APPENDICES



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Appendix A

TABLE OF ABBREVIATIONS AND ACRONYMS

ABBREVIATION OR ACRONYM	DEFINITION
AAN	Afghanistan Analysts Network
ACBAR	Agency Coordinating Body for Afghan Relief
ACCI	Afghanistan Chamber of Commerce and Industries
ACD	Afghanistan Customs Department
ACU	Anti-Corruption Unit
ADB	Asian Development Bank
AEITI	Afghanistan Extractive Industries Transparency Initiative
AGO	Attorney General's Office
AIBA	Afghanistan Independent Bar Association
AISA	Afghanistan Investment Support Agency
ALP	Afghan Local Police
AML	Anti-Money Laundering
ANA	Afghan National Army
ANCB	Afghan NGO Coordination Bureau
ANDS	Afghanistan National Development Strategy
ANP	Afghan National Police
ANSA	Afghanistan National Standards Authority
ANSF	Afghan National Security Forces
ARAZI	Afghanistan Independent Land Authority
ARDS	Afghanistan Reconstruction and Development Services
ARTF	Afghanistan Reconstruction Trust Fund
ASYCUDA	Automated System for Customs Data
ATRA	Afghanistan Telecommunication Regulatory Authority
AUAF	American University of Afghanistan
CBR	Central Business Registry (MOCI)
CEO	Chief Executive Officer
CERP	Commander's Emergency Response Program (U.S. Army)
CIM	Center for International Migration and Development
CJIATF	Combined Joint Inter-Agency Task Force
CMS	Case Management System
CoST	Construction Sector Transparency Initiative
CSO	Civil Society Organization
CTAP	Civilian Technical Assistance Programme
CTF	Counter-Terrorism Financing
DAB	Da Afghanistan Bank
DABS	Da Afghanistan Breshna Sherkat
DAD	Development Assistance Database
DANIDA	Danish International Development Agency
DBI	Doing Business Index
DFID	Department for International Development (UK)
EU	European Union
EUPOL	European Union Police Mission
FDRC	Financial Disputes Resolution Commission

ABBREVIATION OR ACRONYM	DEFINITION
FINTRACA	Financial Transactions and Reports Analysis Centre of Afghanistan
FIU	Financial Intelligence Unit
FSD	Financial Supervision Department (FINTRACA)
GDPT	General Directorate of Pension Treasury
GIRoA	Government of the Islamic Republic of Afghanistan
GIS	Geographic Information System
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
Harakat	Afghanistan Investment Climate Facility Organization
HOO	High Office of Oversight and Anti-Corruption
IARCSC	Independent Administrative Reform and Civil Service Commission
ICPC	Interim Criminal Procedure Code
ICT	Information and Communication Technologies
ICTAWG	International Community Transparency and Accountability Working Group
IDLG	Independent Directorate of Local Governance
IDLO	International Development Law Organization
IDP	Internally Displaced Person
IEC	Independent Election Commission
IFC	International Finance Corporation
IMF	International Monetary Fund
INL	Bureau of International Narcotics and Law Enforcement Affairs (USG)
INTERPOL	International Criminal Police Organization
IRD	International Relief and Development
ISAF	International Security Assistance Force (NATO)
IWA	Integrity Watch Afghanistan
JCMB	Joint Coordination and Monitoring Board
JICA	Japan International Cooperation Agency
KBR	Kabul Bank Receivership
KM	Kabul Municipality
LOTFA	Law and Order Trust Fund for Afghanistan
MAIL	Ministry of Agriculture, Irrigation and Livestock
MCTF	Major Crimes Task Force
MEC	Independent Joint Anti-Corruption Monitoring and Evaluation Committee
MIS	Management Information System
MOCI	Ministry of Commerce and Industries
MOCIT	Ministry of Communication and Information Technology
MOD	Ministry of Defense
MOE	Ministry of Education
MOEC	Ministry of Economy
MOF	Ministry of Finance
MOFA	Ministry of Foreign Affairs
MOHE	Ministry of Higher Education
MOHRA	Ministry of Hajj and Religious Affairs
MOI	Ministry of Interior
MOIC	Ministry of Information and Culture
MOJ	Ministry of Justice

ABBREVIATION OR ACRONYM	DEFINITION
MOLSAMD	Ministry of Labour, Social Affairs, Martyrs and Disabled
MOMP	Ministry of Mines and Petroleum
MOPH	Ministry of Public Health
MOPW	Ministry of Public Works
MORR	Ministry of Refugees and Repatriations
MOTCA	Ministry of Transportation and Civil Aviation
MOU	Memorandum of Understanding
MP	Member of Parliament
MRRD	Ministry of Rural Rehabilitation and Development
MSI	Management Systems International
MTA	Military Technical Agreement
MTF	Mobile Task Force
NACS	National Anti-Corruption Strategy (Azimi Strategy)
NATO	North Atlantic Treaty Organization
NDS	National Directorate of Security
NGO	Non-Governmental Organization
NMH	National Military Hospital
NPP	National Priority Program
NPP2	National Transparency and Accountability Program
OAA	Office of Administrative Affairs and Council of Ministers Secretariat
OECD	Organisation for Economic Co-operation and Development
PD 45	Presidential Decree 45
PETS	Public Expenditure Tracking Survey
PPU	Procurement Policy Unit (MOF)
PRT	Provincial Reconstruction Team
SAO	Supreme Audit Office
SIGAR	Special Inspector General for Afghanistan Reconstruction
TI	Transparency International
TMAF	Tokyo Mutual Accountability Framework
TOR	Terms of Reference
UN	United Nations
UNAMA	United Nations Assistance Mission in Afghanistan
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNHCR	United Nations High Commissioner for Refugees
UNODC	United Nations Office on Drugs and Crime
UNOPS	United Nations Office for Project Services
UNTOC	United Nations Convention against Transnational Organized Crime
USAID	United States Agency for International Development
USD	United States Dollar
USG	United States Government
VCA	Vulnerability to Corruption Assessment
WB	World Bank

Appendix B

ABOUT MEC

Founding and Structure

The Independent Joint Anti-Corruption Monitoring and Evaluation Committee, more commonly known as MEC, began operating in 2011. It was formed in response to discussions held at conferences in London and Kabul in 2010 and organized pursuant to Presidential Decree 61. MEC's function is to serve as an independent and credible mechanism for monitoring and evaluating Afghan and international anti-corruption efforts.

MEC operates independently from the Government of Afghanistan and from the international community. This independence permits MEC the freedom to pursue its agenda in the absence of political or governmental interference.

MEC is governed by a six-member Committee. The Committee consists of three Afghan and three international senior anti-corruption experts, each with significant experience in preventing, detecting, and deterring the waste, fraud, and abuse of public funds. The Committee is supported by a Secretariat made up of several dozen Afghan and international anti-corruption experts who manage MEC's day-to-day operations. The Secretariat is divided into two major sections: one with responsibility for monitoring and evaluation tasks as well as for issuing VCAs, and the other with responsibility for research, reporting and communications.

Mandate

MEC's Terms of Reference, essentially its charter, charge it with:

- developing anti-corruption recommendations and benchmarks,
- monitoring and evaluating the anti-corruption efforts of the Afghan government and international community, and
- reporting to the Afghan President, Parliament, and public, as well as to the international community, about the state of corruption in Afghanistan.

Products

MEC fulfills these mandates in a variety of ways, including by issuing comprehensive reports every six months updating stakeholders on its activities; conducting VCAs, which focus on discrete aspects of Afghan institutions, examining where specific process improvements could reduce the chances of corruption; drafting policy papers and background reports on an ad hoc basis to address matters of immediate concern; consulting with Afghan officials, CSOs, and the international donor community to develop policies that would reduce corruption; and compiling recommendations and benchmarks structured in such a manner that provides clear guidance to all parties about how to address the various manifestations of corruption in Afghanistan.

In late 2014, MEC introduced its Anti-Corruption Monitoring and Evaluation Framework and Tool, which captures all of MEC's recommendations in one document, breaking them down into their component parts to provide clear guidance to the recipient about how to implement them. This Framework and Tool is updated every six months, and has become a key driver of the new government's anti-corruption strategy.

Appendix C

ANTI-CORRUPTION MONITORING AND EVALUATION TOOL

MEC's Monitoring and Evaluation Tool

Based on its mandate, MEC issues recommendations to government institutions and the international community with the intention of reforming systems and effectively fighting corruption. MEC's recommendations are then monitored and evaluated regularly by the M&E team to determine their implementation status. In order to systematically follow up on its recommendations, MEC developed the "M&E Tool," which consists of four main sections (indicator, recommendation, baseline and current status) and is used to measure the implementation status of the recommendations. The four sections are defined below:

Indicator:

Indicators are quantitative or qualitative measures used to indicate change or progress in a particular recommendation.

Recommendation:

Recommendations are targets describing the specific actions to be performed by the relevant institutions.

Baseline:

Baselines are descriptions of the situations prior to the recommendations being communicated to the relevant institutions, against which progress can be assessed or comparisons can be made.

Current Status:

The Current Status of each recommendation is an analysis that describes the current level of implementation of MEC's recommendations. These statuses are updated every six months and a complete and updated M&E Tool is included as an appendix in each six-month report.

In order to make the M&E Tool more user-friendly, the following colors, with their associated meanings, are used to describe the "Current Status" section of the recommendations:

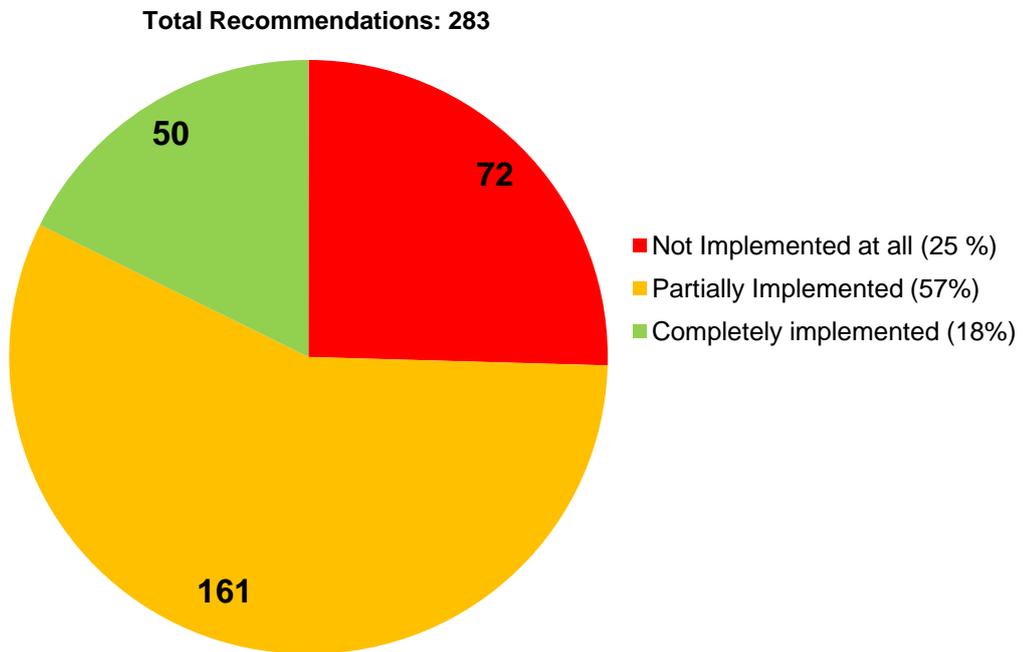
Green: A recommendation highlighted green indicates the recommendation is fully implemented and the target has been achieved.

Orange: A recommendation highlighted orange indicates the recommendation is partially implemented or the implementation process is ongoing. Therefore, all orange-colored recommendations still require follow-up with the relevant institutions, and any change to the status would be visible in the next six-month report.

Red: A recommendation highlighted red indicates the recommendation is not implemented in any way.

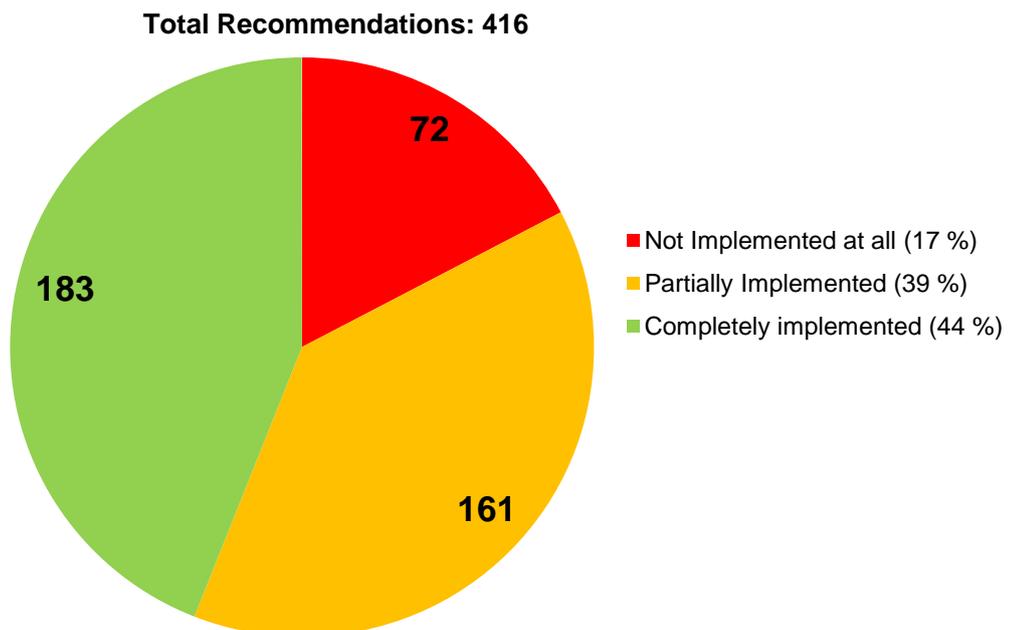
Since its establishment, MEC has issued a total of 416 recommendations, of which 133 were fully implemented as of June 2015. In order to keep the M&E Tool clear and user-friendly, the implemented recommendations are removed from the M&E Tool. The implementation status of the remaining 283 recommendations is shown in the chart on the following page.

Status of Implementation 30 June - 31 December 2015



As mentioned above, MEC has issued a total of 416 recommendations since its establishment. The overall implementation status of these recommendations is shown in the chart below. 183 recommendations (44%) have been completely implemented, 161 recommendations (39%) have been partially implemented, and 72 recommendations (17%) have not been implemented.

Overall Status of Implementation since MEC's establishment



No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
1	Article 12 of the Anti-Corruption Law aligned with constitutional requirements to register, verify, and publish assets of government officials	1.1	HOH	Anti-Corruption Law requires the registration, verification and publication of the assets of members of the National Assembly, members of provincial and district councils, deputy ministers, heads of independent commissions and directorates, ambassadors, governors, judges, Afghan National Army and Police officers, District Administrators, Prosecutors, officials working in second and higher grades and officials working in finance, accounting and procurement sections within 30 days prior to occupation of their positions and annually.	Anti-Corruption Law	(15 Dec. 2013) - The draft Anti-Corruption Law prepared by HOO in consultation with key government stakeholders is aligned with constitutional requirements and has been scrutinized by the MOJ, approved by the council of ministers and submitted to the National Assembly; it has, however, not been approved yet.	(31. Dec. 2015) - The Lower House has not yet approved the Law due to its concern regarding the legal status of HOO as well as its lack of capability to fight corruption effectively. Additionally, there were some serious discussions about the dissolving of HOO in the National Assembly. However, no concrete decision has been made. The Draft Anti-Corruption Law was reviewed. Article 12 of the draft Law is aligned with constitutional requirements.
2	Types of corruption are clearly defined in legislation	2.1	HOH	Terms, such as the stealing of documents, unauthorized destruction of official records; exceeding the limits of legal scope of authority; illegal increase in assets; impeding the implementation of justice; involving ethnic, regional, religious, party, gender and personal considerations in performing entrusted duties; and acting or refusing to act in violation of the anti-corruption strategy, are clearly defined and criminalized under the Penal Code.	Anti-Corruption Law	(15 Dec. 2013) - Corrupt acts are not defined in draft amended Anti-Corruption Law but most of them referred to particular chapters and provisions of the Criminal Law and Anti-Money Laundering Law.	(31. Dec. 2015) - Corrupt acts are not defined in draft amended Anti-Corruption Law but most of them refer to particular chapters and provisions of the Penal Code and Anti-Money Laundering Law. Corrupt acts are defined and penalized under Articles 2 - 11 of Annex 4 of the Penal Code, which has been pending in the Parliament for more than 3 years now.
3	Sufficient penalties and administrative sanctions for those convicted of corrupt acts	3.1	HOH	Anti-Corruption Law includes criminal penalty provisions for all defined acts of corruption, and existing penalties are enhanced.	Anti-Corruption Law	(15 Dec. 2013) - The draft amended Anti-Corruption Law does not contain penalties or administrative sanctions.	(31. Dec. 2015) - The draft amended Anti-Corruption Law does not contain penalties or administrative sanctions. Corrupt acts are defined and penalized under Articles 2 - 11 of Annex 4 of the Penal Code, which has been pending in the Parliament for more than 3 years now.
		3.2	HOH	Administrative sanctions (official warnings, fines, demotion, and dismissal) set for officials who do not comply with the Anti-Corruption Law or who have been found to have engaged in corrupt activities.	Anti-Corruption Law	(15 Dec. 2013) - The draft amended Anti-Corruption Law does not contain penalties or administrative sanctions.	(31. Dec. 2015) - The draft amended Anti-corruption law does not contain penalties and administrative sanctions. Corrupt acts are defined and penalized under Articles 2 - 11 of Annex 4 of the Penal Code, which has been pending in the Parliament for more than 3 years now.
4	Sufficient penalties and sanctions for violations of access to information requirements	4.1	MOIC	Application of the Neglect of Duty clause under the Anti-Corruption Law as a penalty for non-compliance.	Access to Information Law	(15 Dec. 2013) - The draft Access to Information Law still needs to be passed by the Council of Ministers, approved by the National Assembly, endorsed by the President and enacted.	(31 Dec. 2015) - According to Information Law, Article (26), the following are considered violations of the Law: 1) Providing information contrary to the application form; 2) Declining to provide information to applicants, without legitimate reason; 3) Providing false information to the Oversight Commission of Access to Information; 4) Not providing information in the specified timeline. According to paragraph 2 of this article, the Oversight Commission of Access to information can declare a verbal warning, written warning or proposal of salary deduction to address the violations enshrined in §1.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
5	UNCAC self-assessments conducted to assess current legal framework against UNCAC requirements	5.1	HOO	Self-assessment conducted with full participation of the judiciary, SAO and CSOs, and chaired by HOO.	UNCAC self-assessment	(15 Dec. 2013) - Committee for UNCAC self-assessment was formed, chaired by HOO, consisting of representatives of the Supreme Court, the AGO, SAO and NDS, but CSOs were not part of this committee (individual self-assessment was not conducted). The assessment unrealistically asserts that Afghanistan is in compliance with UNCAC with respect to each and every provision of the Convention that is addressed in the assessment.	(31. Dec. 2015) - The quality of the First Phase of the UNCAC Self Assessment conducted and chaired by HOO was very poor and misrepresented Afghanistan's compliance with UNCAC requirements. In its current form, the UNCAC self-assessment provides little insight into the government of Afghanistan's anti-corruption landscape. For the Second Phase, a capable government body needs to be designated to conduct the self-assessment of Afghanistan and develop an action plan based on the identified gaps.
		5.2	HOO	UNCAC self-assessment includes a substantive assessment of the implementation of measures meant to respond to specific UNCAC requirements	UNCAC self-assessment	(15 Dec. 2013) - Although most of the UNCAC requirements are enshrined in the Anti-Corruption Law, there are still deficiencies in Afghanistan's legal framework to be identified and eliminated.	(31. Dec. 2015) - In its current form, the UNCAC self-assessment provides little insight into the government of Afghanistan's anti-corruption landscape. According to the General Directorate of Legal, Justice and Judicial Affairs of the Administrative Office of the President (AOP), good governance and Anti-Corruption issues from a working perspective, is more related to the office of President's Special Representative for Reforms and Good Governance.
		5.3	AOP	The new government reviews the 1st phase of UNCAC self-assessment previously conducted by HOO in order to accurately evaluate gaps and weaknesses.	UNCAC self-assessment	(12 Nov. 2014) - Afghanistan's UNCAC self-assessment conducted under HOO leadership has many gaps and weaknesses and does not accurately represent the situation of corruption in Afghanistan.	(31 Dec. 2015) - According to the General Directorate of Legal, Justice and Judicial Affairs of the Administrative Office of the President (AOP), the new government has not reviewed the 1st phase of UNCAC self-assessment conducted by HOO. According to the General Directorate of Legal, Justice and Judicial Affairs of the Administrative Office of the President (AOP), good governance and Anti-Corruption issues from a working perspective, is more related to the office of President's Special Representative for Reforms and Good Governance.
		5.4	AOP	The new government designates a more competent body to oversee and chair the 2nd UNCAC self-assessment review phase	UNCAC self-assessment	(12 Nov. 2014) - Afghanistan's UNCAC self-assessment conducted under HOO leadership has many gaps and weaknesses and does not accurately represent the situation of corruption in Afghanistan.	(31 Dec. 2015) - The new government has not yet designated a competent body to oversee and chair the 2nd UNCAC self-assessment review phase. According to the General Directorate of Legal, Justice and Judicial Affairs of the Administrative Office of the President (AOP), good governance and Anti-Corruption issues from a working perspective, is more related to the office of President's Special Representative for Reforms and Good Governance.
6	Development and implementation of an action plan to address deficiencies	6.1	HOO	Action plan provides concrete steps for addressing deficiencies identified in the self-assessment and peer reviews, as well as milestones for their implementation.	UNCAC self-assessment	(15 Dec. 2013) - Deficiencies have not been identified or corrected.	(31. Dec. 2015) - The second phase of the UNCAC self-assessment has not started yet. Therefore, an action plan which would address the deficiencies is not yet drafted.

No. Indicator		No.	Inst.	Recommendation	Sec.	Baseline	Status
7	Enactment of stand-alone legislation for the usurpation of land	7.1	ARAZI / MOJ	The Ministry of Justice, in close cooperation with key stakeholders including Arazi, Kabul Municipality, the Supreme Court, the AGO and the MOJ, should review the draft Law on Usurpation of Public and Private Land to further enrich and propose a comprehensive law for approval.	Land Usurpation	(15 Dec. 2014) - The Law was drafted by the Lower House but rejected by the Upper House. The MOJ believes that the enactment of stand-alone legislation for the usurpation of land would duplicate already existing laws. The MOJ has criminalized land usurpation under Article 12 of Annex 4 of the Penal Code which has four clauses. Annex 4 of the Penal Code has been pending in the Parliament for more than 3 years now.	(31 Dec. 2015) - The draft amendment of the Law of Land Affairs covers Identifying Land Usurpers and Punishment of Land Usurpers in two chapters. The draft Law has been submitted to the MoJ on 27 April 2015 for processing. According to ARAZI, the scrutinizing of the law is scheduled in the third 100-Day plan of MOJ.
		7.2	ARAZI / MOJ	The new law on Usurpation of Governmental and Non-Governmental Properties enacted and enforced effectively.	Land Usurpation	(15 Dec. 2013) - The Law on Illegal Usurpation of Governmental and Non-Governmental Properties was approved by the Lower House but rejected by the Upper House.	(31 Dec. 2015) - The draft amendment of the Law of Land Affairs is at the MoJ for further process. According to ARAZI, the scrutinizing of the law is scheduled in the third 100-Day plan of MOJ.
8	Enactment of Property Dealer Law	8.1	MOJ	Property Dealer Law enacted and enforced effectively	Property Dealer Law	(15 Dec. 2014) - The amendments to the Property Dealer Law are under MOJ consideration. However, it is currently on hold because priority has been given to other laws.	(31 Dec. 2015) - The new Property Dealer Law has been enacted and published in the official Gazette Nr. 1189 on 17th of October 2015.
9	Criminalization of land usurpation	9.1	ARAZI / MOJ	The act of land usurpation clearly defined in the Penal Code with strong punishment	Land Usurpation	(15 Dec. 2013) - Land usurpation criminalized in the new law; but unclear whether enacted.	(31 Dec. 2015) - Land usurpation has been criminalized under Article 12 of Annex 4 of the Penal Code, which has four clauses. Annex 4 of the Penal Code has been pending in the Parliament for more than 3 years now. Additionally, the draft amendment of the Law of Land Affairs covers Identifying Land Usurpers and Punishment of Land Usurpers in two chapters. According to ARAZI, the scrutinizing of the law is scheduled in the third 100-Day plan of MOJ.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
10	Effective detection, investigation, and prosecution of land usurpation	10.1	ARAZI/MOI	Arazi and MOI refer all cases of land usurpation to the AGO	Land Usurpation		(31 Dec. 2015) - ARAZI has sent the list of 15,831 land usurpers to the Presidential Office and the National Assembly. The list contains names of people who allegedly grabbed 1.3 Million Jerib of land in 34 provinces and built 1.a. 335 illegal residential towns. According to ARAZI's statements during their press conference, most of the land usurpers are high ranking officials and powerful people. Additionally, ARAZI has prepared two proposals and submitted it to the 4th session of High Council of Land and Water, which are applicable after the enactment of the Law of Land Affairs. The two proposals are: The 5-year Strategic Plan for Prevention of Land Usurpation and Proposal for Addressing Usurped Land.
		10.2	AGO/ARAZI	The AGO investigates the cases in a timely manner as required by the law and provides regular updates to detection agencies on the progress of their investigation.	Land Usurpation	(15 Dec. 2013) - Main land usurpers are still enjoying impunity and are not prosecuted due to the lack of law enforcement.	(31 Dec. 2015) - According to the official response of AGO, the Attorney General has investigated some cases of land usurpation and unplanned apartments in different parts of Kabul city and referred their cases to the courts after completion. Currently, 6 cases of land usurpation are under investigation of the Criminal Investigation Department of AGO. According to the AGO, the detection agencies are officially informed about the progress in the prosecution process.
		10.3	AGO	AGO refers all cases to the courts for prosecution; cases dropped by the AGO are documented and reported to the detection agencies.	Land Usurpation	(15 Dec. 2013) - The AGO has not investigated the cases in a timely manner and has not provided reports to detection agencies.	(31 Dec. 2015) - According to the AGO, the Attorney General has referred all cases to the courts after completion of the investigation process. Also, the detection agencies are officially informed about the progress in the prosecution process.
		10.4	Supreme Court	Courts hear and decide all cases in a timely manner as required by the law.	Land Usurpation	(15 Dec. 2013) - Main land usurpers are still enjoying impunity and are not prosecuted due to the lack of law enforcement.	(31 Dec. 2015) - According to the official response of the Supreme Court, the courts are dealing with all cases in a timely manner. However, in practice a lot of cases have been pending in the courts for several years.
		10.5	ARAZI	MOU signed between the Supreme Court, ARAZI, the MOJ and the MOI to ensure better cooperation, coordination and collaboration on management of land usurpation cases, including detection, investigation, prosecution and land dispute resolution.	Land Usurpation	(15 Dec. 2014) - ARAZI is currently working on an MOU with the relevant stakeholders, but no MOU has been signed yet.	(31 Dec. 2015) - According to ARAZI, MOU with the relevant stakeholders will be signed after the approval of the Law on Land Affairs.
		10.6	ARAZI/MOI	Interference of MOI and AGO in regard to civil land disputes stopped and such cases referred to the MOJ Legal Department.	Land Usurpation	(15 Dec. 2014) - The interference of MOI and AGO in civil land disputes is on-going.	(31 Dec. 2015) - The draft Law on Obtaining Rights is under process of MoJ. According to the provisions of this Law, only courts and Rights Directorate (Hoqooq) has the right to deal with civil disputes. However, according to the informal information received from MOJ and MOI, the interference in the civil disputes are still ongoing.
		10.7	ARAZI/MOI	MOI regularly reports on their measures to the government to protect government land, assist in investigations, ensure that defendants appear in court, and enforce orders regardless of the identity of the parties to the disputes.	Land Usurpation	(15 Dec. 2014) - MOI's performance in this regard has been very poor so far.	(31 Dec. 2015) - According to MOI there is a reporting mechanism in place. MoI has shared a summary of the usurpation report with MEC which includes the usurped government land until 1393, the total number of usurped land and the number of the usurpers in 30 provinces.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
11	A procedure developed to deal with land usurpation cases with no documents or records	11.1	Supreme Court	The new procedure developed and enacted by the Supreme Court	Land Usurpation	(15 Dec. 2014) - There is no procedure in place.	(31 Dec. 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations.
12	ARAZI proposes amendments to the law in order to transfer the responsibility of land transfer and registration from the courts to ARAZI and submits them to the MOJ for further processing.	12.1	ARAZI	The responsibility of land transfer and registration given to ARAZI	Land Registration	(15 Dec. 2014) - ARAZI has submitted a proposal in this regard to the MOJ at the end of 1391.	(31 Dec. 2015) - According to ARAZI, the draft amendment of the Law on Land Affairs covers this issue. Additionally based on ARAZI's report, a Memorandum of Understanding has been signed between ARAZI and Supreme Court which gives the responsibility of land registration and land transfer to ARAZI. ARAZI started the land registration and transferring process in Herat province which will be continued to other provinces as well.
13	New technology introduced and put to use	13.1	ARAZI	New technology used by the courts. ARAZI and municipalities to identify and detect fake land ownership documents	Land Usurpation	(15 Dec. 2014) - ARAZI has developed a 5-year Strategy which has been submitted to the President's Office for approval. This recommendation is covered by ARAZI's 5-years Strategy.	(31 Dec. 2015) - ARAZI's 5-year strategic plan stipulates the establishment of Geographic Information System (GIS, ALARMIS) for registration of land.
14	Capacity of relevant officials of the MOI, MOJ and courts enhanced	14.1	MOI/MOJ/SC	Officials of the police and courts receive special trainings on land related procedures and legislations	Land Usurpation		(31 Dec. 2015) - The draft amendment of the Law on Land Affairs is currently under the review of MOJ and is not approved yet. Therefore, the training on land legislation and procedure will be conducted when the Law is enacted.
15	The process of land survey and land registration started and completed	15.1	ARAZI	The survey and registration of land all over Afghanistan started and completed in five years by ARAZI	Land Registration	(15 Dec. 2014) - According to ARAZI's 5-year Strategy, the survey will be started in 1394 in Bamyan province and will be expanded to other provinces accordingly.	(31 Dec. 2015) - Based on ARAZI's report, the survey will be started as a pilot project in Bamyan province after the approval of the proposal submitted to the Presidential Office and the related budget. The survey will be extended to other provinces accordingly.
		15.2	ARAZI	Private and government land is identified as a result of a country-wide survey and registration	Land Registration		(31 Dec. 2015) - Based on ARAZI's report, the start of this process is under consideration and a proposal in this regard has been submitted to the Presidential Office for approval.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
16	Waqfi land (allocated land for public interest) surveyed and registered all over Afghanistan	16.1	MOHRA	The process of survey and registration of Waqfi land started and completed by MOHRA in close cooperation with other government stakeholders within two years	Land Registration	(15 Dec. 2014) Based on Resolution #3 of the Council of Ministers dated 01.08.1393 and MEC's recommendations, MOHRA sent official letters to 34 provinces to identify and register Waqfi land in close cooperation with the provincial Directorates of MOHRA, Cadaster, and municipalities, among others.	(31 Dec. 2015) - MOHRA has recommended its provincial directorates to identify and register Waqfi Land with the support of the directorates of MAIL, Cadaster, NDS, ARAZI, HOO, AGO and representatives of each province. Joint committees have been established in all provinces with the participation of the above mentioned institutions. Some of these committees, which have already started actively working, are reporting to MOHRA on a regular basis. Some of these reports have been shared with MEC. The circular sent by MOHRA to its directorates in 34 provinces along with the registration form, has been shared with MEC.
		16.2	MOHRA	Waqfi lands identified and registered and usurpation of Waqfi land prohibited	Land Registration		(31 Dec. 2015) - Based on MOHRA's report, the total number of Waqfi Land is approx. 58,000 jerib. Of this number some 34,000 have been usurped in different provinces. MOHRA was able to recover about 9,000 jerib with the support of involved authorities. List of the usurped Waqfi Land has been shared with MEC.
		16.3	MOHRA	The relevant Waqfi land documents kept in MOHRA's Archive.	Land Registration		(31 Dec. 2015) - Since a large number of Waqfi Land was donated in the past decades, they do not have proper documents or the documents were destroyed during the war years. According to MOHRA, currently the ministry tries to document the Waqfi lands.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
17	The process of land distribution, land registration and land transfer computerized	17.1	ARAZI	Land-related processes in relevant institutions including ARAZI, MORR, MOHRA, Kabul Municipality and Makhzan computerized	Land Registration	(15 Dec. 2014) - According to the 5-year Strategy, ARAZI will digitize its documents.	(31 Dec. 2015) - ARAZI's 5-year strategic plan stipulates the establishment of Geographic Information System (GIS, ALARMIS) for registration of land.
18	Existing land/property ownership documents reviewed	18.1	ARAZI/SC	A committee chaired by the Supreme Court consisting of relevant government stakeholders, including ARAZI, established to review the existing land /property ownership documents.	Land Registration	(15 Dec. 2014) - ARAZI's 5-year Strategy covers this issue.	(31 Dec. 2015) - According to ARAZI, an initial two meetings have been conducted under the chairmanship of the second Vice President. Additionally, a Memorandum of Understanding is planned to be signed soon between ARAZI and Supreme Court to review the ownership documents of Land.
		18.2	ARAZI/SC	A comprehensive land/property ownership document developed and used for this purpose	Land Registration	(15 Dec. 2014) - ARAZI's 5-year Strategy covers this issue.	(31 Dec. 2015) - ARAZI's 5-year strategic plan covers this issue. Additionally, a MOU is planned to be signed soon between ARAZI and Supreme Court to review the ownership documents of Land.
19	A needs assessment conducted	19.1	ARAZI	Sufficient financial support and human resources allocated to ARAZI	Capacity and Resources ARAZI	(15 Dec. 2014) - ARAZI does not have sufficient financial or human resources. For the fiscal year 1394 ARAZI plans to submit specific proposals to the Budget Committee of the MOF in this regard.	(31 Dec. 2015) - According to ARAZI, a proposal regarding the financial and human resources of ARAZI has been sent to the Presidential Office based on the needs assessment of ARAZI. No response has been provided in this regard.
20	A comprehensive and long term strategy developed	20.1	MUDA	A long term strategy to address the issue of settlements in Afghanistan developed by the Ministry of Urban Development Affairs	Housing		(31 Dec. 2015) - Based on the Assessment of Afghan Cities conducted in 2015, MUDA has developed and finalized a 5-year strategy. Housing issues are a major part of this strategy. Report of the Assessment of Afghan Cities has been shared with MEC and the 5-year strategy will be shared after the Minister has signed it.
		20.2	MUDA	Short term actions including building houses taken by the Ministry of Urban Development Affairs to address the immediate needs of homeless people	Housing		(31 Dec. 2015) - According to MUDA, actions has been taken to address the housing needs of the people. These actions include building residential apartments in: 4th and 5th Makrorayan, Qasaba, Khoshhal Khan Mena, the Emirates Project in Qasaba area for disabled and martyrs, Sanaye Township, Lala Township, Bagrami Township, Rahman Mena Township. Additionally, the plans for building 10000 residential apartments with the support of the People Republic of China, the plan for re-operationalizing the Construction Tasadi with the Support of Russia and building 500 residential apartments for disabled and martyrs with the support of Qatar are part of these actions.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
21	Legislated system for the reporting of illegal activities and corruption	21.1	PAC/MOJ	Whistle-blower Protection Law enacted	Whistle-blower Protection	(15 Dec. 2013) - MEC is drafting a Whistle-blower Protection Law.	(31 Dec. 2015) - MEC initiated drafting the Whistle-blower Protection Law. The draft law is finalized and sent to the Parliament's Anti-Corruption Caucus through the official letter # 2701 dated 01. Nov. 2015 for the legislative process.
22	Government anti-corruption strategy and policies developed with broad consultation in consideration of the existing Anti-Corruption Strategy	22.1	AOP/HOO	HOO leads the development of the strategy in consultation with the MOJ, MOJ, AGO, Supreme Court, NDS, and CSOs	Anti-Corruption Strategy	(15 Dec. 2013) - Working on developing a government-wide anti-corruption strategy has not started yet.	(31. Dec. 2015) - Based on resolution No. 3 of the Cabinet dated 23 Oct. 2014, HOO's mandate is limited to the registration and verification of high ranking official's assets as well as simplification of procedures. The leadership of the new government is willing to develop a new comprehensive anti-corruption strategy but has not yet assigned the responsibility to any institution. Once the responsibility for drafting the new strategy is assigned to an institution, MEC will follow up this recommendation with the responsible institution. According to the General Directorate of Legal, Justice and Judicial Affairs of the Administrative Office of the President (AOP), initiating the National Anti-Corruption Strategy from a working perspective, is more related to the office of President's Special Representative for Reforms and Good Governance.
23	Awareness of anti-corruption obligations and responsibilities across the government	22.2	AOP/HOO	New anti-corruption strategy approved by the Council of Ministers	Anti-Corruption Strategy	(15 Dec. 2013) - Working on developing a government-wide anti-corruption strategy has not started yet.	(31. Dec. 2015) - The existing Anti-Corruption Strategy has expired, so there is a need to develop a new comprehensive strategy. The new anti-corruption strategy has not been drafted yet. Once the responsibility for drafting the new strategy is assigned to an institution, MEC will follow up this recommendation with the responsible institution.
24	Functional governance structures to ensure effective implementation and monitoring of anti-corruption strategies and policies	23.1	HOO	HOO implements regular awareness trainings for all government institutions, circulates the hard and soft copies of the strategy to the relevant institutions all over the country, and introduces focal points for any questions	Anti-Corruption Strategy	(15 Dec. 2013) - Working on developing a new government-wide anti-corruption strategy has not started yet.	(31. Dec. 2015) - A new anti-corruption strategy has not been drafted yet. Once the responsibility for drafting the new strategy is assigned to an institution, MEC will follow up this recommendation with the responsible institution.
		24.1	HOO	All government institutions have an anti-corruption body with clear terms of reference, regular meetings, clear priorities and a mechanism for reporting on activities and results to the HOO and line ministries.	Anti-Corruption Strategy	(15 Dec. 2013) - Working on developing a new government-wide anti-corruption strategy has not started yet.	(31. Dec. 2015) - A new anti-corruption strategy has not been drafted yet. Once the responsibility for drafting the new strategy is assigned to an institution, MEC will follow up this recommendation with the responsible institution.
		24.2	HOO	HOO designates focal points for each government ministry/institution to provide support and technical assistance to the ministry/institution in the implementation of the strategy.	Anti-Corruption Strategy		(31. Dec. 2015) - A new anti-corruption strategy has not been drafted yet. Once the responsibility for drafting the new strategy is assigned to an institution, MEC will follow up this recommendation with the responsible institution.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
25	VCAs conducted for important government services	25.1	HOH	HOO in consultation with the IARCSC prioritizes government services for VCAs	VCA	(15 Dec. 2013) - Previously, the HOO has conducted a number of VCAs within the Traffic Department and as a result simplified the process of Jawaz e Sair. MEC has also conducted five different VCAs within the IARCSC, MOHE, MORR, and MOLSAMD.	(31 Dec. 2015) - Based on the resolution No. 3 of the Cabinet dated 23 Oct. 2014, HOO's mandate is limited i.e. to the simplification of procedures of providing public services. MEC Secretariat has sent several official letter to HOO asking for information in this regard but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.
		25.2	HOH	VCAs conducted by HOO on the basis of priorities identified.	VCA		(31 Dec. 2015) - MEC Secretariat has sent several official letter to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
26	Strengthened capacity of the High Office of Oversight Asset Registration and Declaration Department	26.1	HOH	HOO expands the organizational structure of the Asset Registration and Declaration Department to ensure sufficient resources to meet their legal obligations.	Asset Reg. & Verif.	(15 Dec. 2013) - No progress in this regard	(31 Dec. 2015) - MEC Secretariat has sent several official letter to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.
		26.2	HOH	HOO develops and implements a recruitment strategy based on merit and open competition to hire individuals with relevant education and sufficient experience	Asset Reg. & Verif.	(15 Dec. 2013) - The strategy has not been developed yet	(31 Dec. 2015) - MEC Secretariat has sent several official letter to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.
		26.3	HOH	Trainings provided to enhance the capacity of the current and future staff of the Asset Registration and Declaration department	Asset Reg. & Verif.	(15 Dec. 2013) - No progress in this regard	(31 Dec. 2015) - MEC Secretariat has sent several official letter to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
27	Cooperation amongst agencies necessary for the verification of assets	27.1	HOO	HOO signs MOUs with relevant government institutions including the AGO, Makhzan (Supreme Court), FINTRACA (DAD), Major Crime Task Force (MOI), Anti-Corruption Unit (MOI), Interpol Afghanistan (MOI), NDS, Registration Department of Properties (municipalities), Department of Properties (MAIL), MOFA, Department of Government Cases (MOJ), AISA, Department of Taxes (MOF), Department of Salaries (MOF), Department of Public Procurement (MOF) and Department of Contracts (MOF).	Asset Reg. & Verif.	(15 Dec. 2013) - HOO identified 14 institutions/organizations as important stakeholders in asset registration and verification but has not signed MOUs with them. A new MOU on asset registration and verification has been drafted by HOO involving the HOO, Supreme Court, MOI, NDS, and AGO, but has not been signed yet.	(31 Dec. 2015) - MEC Secretariat has sent several official letters to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.
		27.2	HOO	HOO establishes and implements a mechanism for regular coordination meetings amongst agencies relevant to asset registration, verification and declaration.	Asset Reg. & Verif.	(15 Dec. 2013) - The mechanism has not been established yet.	(31 Dec. 2015) - MEC Secretariat has sent several official letters to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.
28	Registration, publication and verification of assets required by the Constitution and laws of Afghanistan	28.1	HOO	HOO registers and publishes the assets of the President, Vice-Presidents, ministers, members of the Supreme Court as well as the Attorney General within one month of their appointment and verifies the assets within three months of their appointments.	Asset Reg. & Verif.	(15 Dec. 2013) - About 7,000 officials' assets registered but the publication of the assets based on constitutional requirement has been symbolic.	(31 Dec. 2015) - MEC Secretariat has sent several official letters to HOO asking for information regarding the implementation status of MEC's recommendations, but has not received any response yet. MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations.
		28.2	HOO	HOO registers and widely publishes (in electronic and print media) the assets of the members of the National Assembly, members of provincial and district councils, deputy ministers, heads of independent commissions and directorates, ambassadors, governors, judges, officers of the Afghan National Army and Police, District Administrators, Prosecutors, officials working in second and higher grades and officials working in finance, accounting and procurement sections within one month of their appointments and verifies the assets within three months of their appointments as well as annually thereafter.	Asset Reg. & Verif.	(15 Dec. 2013) - About 7,000 officials' asset registered but the publication of the assets based on constitutional requirement has been symbolic	(31 Dec. 2015) - MEC Secretariat shared once again its recommendations with HOO through an official letter on November 1st 2015. Subsequently, the Secretariat visited the HOO and asked for the implementation status. The HOO declined to provide any information regarding the implementation of MEC's recommendations. Further, MEC Secretariat has seen the website of HOO and found, that the assets of the President, 2nd vice president and CEO are recently published. Additionally, the Draft Annex 4 of the Penal Code which has been pending in the Parliament for more than 3 years, states: Article 7: 1) If a public official does not fill the asset registration form in the specified time, he/she will be levied with a fine of 5,000 to 20,000 Afghamis. 2) If he/she provides false information or conceals his/her assets, apart from the fine enshrined in §1 he/she will be convicted to a short term of imprisonment. Article 8: 1) If the public official cannot provide reasons for his/her enrichment his/her illicit assets will be confiscated and he/she will be convicted to a medium term of imprisonment
		28.3	HOO	HOO verifies the assets of registered officials within one month after their terms of office end	Asset Reg. & Verif.	(15 Dec. 2013) - No progress in this regard	(31 Dec. 2015) - MEC has not been updated on the implementation of the recommendations as HOO has not responded to our official letters.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
29	Prosecution of individuals who fail to register assets, who make false declarations, or who have been found to have obtained assets illegally	29.1	HOO	HOO identifies all individuals who fail to register assets, make false declarations or are found to have obtained illegal assets and refers the cases to the AGO for prosecution	Asset Reg. & Verif.	(15 Dec. 2013) - Legal provisions in regard to verification of the assets of government officials have not been enforced and the illicit enrichment cases are not referred to the AGO.	(31 Dec. 2015) - MEC has not been updated on the implementation of the recommendations as HOO has not responded to our official letters.
		29.2	HOO	AGO investigates the cases in a timely manner as required by the law and provides regular updates to the HOO on the progress of their investigation	Asset Reg. & Verif.		(31 Dec. 2015) - AGO has never received any cases of false declaration or illicit enrichment from the HOO.
		29.3	HOO	AGO refers all cases to the courts for prosecution; cases dropped by the AGO are documented and reported to the HOO	Asset Reg. & Verif.		(31 Dec. 2015) - AGO has never received any cases of false declaration or illicit enrichment from the HOO which could be referred to the courts.
		29.4	HOO	Courts hear and decide all cases in a timely manner as required by the law	Asset Reg. & Verif.		(31 Dec. 2015) - AGO has never received any cases of false declaration or illicit enrichment from the HOO which could be referred to the courts.
30	Prosecution of and/or disciplinary measures against HOO staff members who knowingly aid individuals in avoiding registering assets and making false declarations	30.1	HOO	Administrative sanctions (official warnings, fines, demotion, and dismissal) set for staff members who help individuals avoid the registration of their assets in any way	Asset Reg. & Verif.		(31 Dec. 2015) - MEC has not been updated on the implementation of the recommendations as HOO has not responded to our official letters.
		30.2	HOO	Cases of HOO staff members aiding and abetting individuals in avoiding the registration of their assets reported to the AGO for further investigation and prosecution depending on the severity of the case	Asset Reg. & Verif.		(31 Dec. 2015) - MEC has not been updated on the implementation of the recommendations as HOO has not responded to our official letters.
31	Donor funded programs and projects clearly tied to government priorities	31.1	International Community	Donors reporting on their alignment with NPPs clearly set out the link between their funding and NPP activities	Donor Coordination		(31 Dec. 2015) - No major donors formally reported back, but based on discussions with some donors and the Resident Coordinator's Office Afghanistan, most programs are being aligned with NPPs. MEC's Secretariat has tried repeatedly via emails, calls and sometimes meetings with major donors to receive the required information on implementation status of MEC's recommendations. Unfortunately, the required information has not been shared with MEC yet.
32	Coordination with relevant government agencies in the design and implementation of projects and programs	32.1	International Community	Donors consult with line ministries and provincial authorities in program and project identification, design, and implementation	Donor Coordination		(31 Dec. 2015) - No major donors formally reported back, but according to the Aid Management Directorate of MOF it is common practice to consult with line ministries and provincial authorities by setting priorities. MEC's Secretariat has tried repeatedly via emails, calls and sometimes meetings with major donors to receive the required information on implementation status of MEC's recommendations. Unfortunately, the required information has not been shared with MEC yet.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
33	Procurement practices of international stakeholders in Afghanistan are consistent with Afghan Procurement Law restrictions on sub-contracting	33.1	International Community	Donors restrict sub-contracting to no more than 20 percent of the value of the main contract	Subcontracting	(15 Dec. 2013) - There is no initiative from Shafafiyat to align their procurement practices with the Afghan procurement law.	(31 Dec. 2015) - No major donors formally reported back on this issue, but major donors have made it clear that they are legally bound to their own procurement standards. According to the Aid Management Directorate of MoF, since most of the projects are off-budget, the Ministry has no control over them. MEC's Secretariat has tried repeatedly via emails, calls and sometimes meetings with major donors to receive the required information on implementation status of MEC's recommendations. Unfortunately, the required information has not been shared with MEC yet.
34	Comparative assessment of the effectiveness of on- and off-budget funded projects conducted and lessons learned applied to future funding	34.1	International Community	Donors effectively implement best practices and lessons learned from MEC's assessment of donor implemented aid projects	Donor Cooperation		(31 Dec. 2015) - MEC released a report on Nov 8, 2015 called "A Review of Selected Foreign-Assistance Programs Implemented in Afghanistan" included recommendations on aid effectiveness. MEC's Secretariat shared the above-mentioned report and recommendations through official letter # 2725 dated 23/8/1394 with MoF. In addition, the recommendations have been shared with the international community through email. However, MEC Secretariat has not received any update on the implementation status of these recommendations.
35	Appropriate monitoring and evaluation mechanisms developed and implemented for all funds, including security sector spending	35.1	International Community	ISAF develops and implements an appropriate strategy for monitoring security sector funding committed to at the Chicago Conference that includes identification, investigation and prosecution of misappropriation	Donors M&E		(31 Dec. 2015) - ISAF has been replaced by the Resolute Support Mission. Oversight and prosecution of major corruption is contained in the new mission's Essential Functions (EFs). EF 2 is dedicated to Transparency Oversight and Accountability (TOA) and EF 3 is dedicated to Rule of Law, which includes investigation and prosecution of corruption cases. No discernible plan exists to conduct an in-depth assessment of oversight capacity in the MOI or MOD. Capacity building training being conducted for OIGs
36	Cases of misappropriated funds investigated and reported to the proper authorities	36.1	International Community	Donors regularly review the programs and projects they fund and report illegal activities to the relevant Afghan authorities	Donor Reporting		(31 Dec. 2015) - No formal donor responses, but individual level meetings suggest that programs are being regularly reported on. MEC's Secretariat has tried repeatedly via emails, calls and sometimes meetings with major donors to receive the required information on implementation status of MEC's recommendations. Unfortunately, the required information has not been shared with MEC yet.
		36.2	International Community	UNHCR forensic audit completed and identified criminal conduct referred to responsible authorities	Donor Audit	(15 Dec. 2013) - The forensic audit was completed by the UN's inspector General's Office but the report has not been published in its website so far.	(31 Dec. 2015) - The forensic audit was completed by the UN's inspector General's Office but the report has not been published yet. UNHCR has not shared any report with MEC's Secretariat in this regard.
		36.3	International Community	Conclusion of internal LOTFA integrity audit and referral of criminal conduct to responsible authorities	Donor Audit	(15 Dec. 2013) - The internal investigations have not yet concluded	(31 Dec. 2015) - Investigation completed but report has not been shared. According to the UNDP Country Director some cases has been referred for criminal prosecution abroad. However, the results of these investigations are unknown.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
37	Enhanced capacity of civil society and media	37.1	International Community	Donors expand financial and technical support for civil society and media organizations at the local level	Donor Coordination	(15 Dec. 2013) - There are several programs being funded by a variety of donors. These include strengthening CSOs to implement an anti-corruption public information campaign; strengthening CSOs to advocate for good governance and anti-corruption; the creation of organizations that provide support to civil society to participate in anti-corruption efforts; and funding to increase the participation of CSOs in advancing the rule of law and access to justice. But the reality is that the amount of donor funding being spent on anti-corruption efforts is small relative to the amount of overall aid being provided to Afghanistan and the scope of the corruption problem and its effect on all aspects of life in Afghanistan.	(31 Dec. 2015) - MEC's Secretariat has tried repeatedly via emails, calls and sometimes meetings with major donors to receive the required information on implementation status of MEC's recommendations. Unfortunately, the required information has not been shared with MEC yet.
38	Strengthened community monitoring of projects and programs	38.1	International Community	Donors' monitoring and evaluation plans and practices incorporate the engagement of local CSOs and community groups for the monitoring of their projects and programs	Donor M&E		(31 Dec. 2015) - MEC's Secretariat has tried repeatedly via emails, calls and sometimes meetings with major donors to receive the required information on implementation status of MEC's recommendations. Unfortunately, the required information has not been shared with MEC yet. Meanwhile, USAID's new Monitoring & Support Program will rely on a multi-tiered monitoring approach that works with local CSOs and community groups. Deteriorating security situation is making community level monitoring less feasible.
39	Clear case management procedures developed and implemented	39.1	AGO	The Case Management Steering Committee develops procedures for the registration of cases by all detection agencies, departments of the AGO, and the courts.	CMS	(15 Dec. 2013) - No procedure has been developed for registration of cases in any of the justice agencies	(31 Dec. 2015) - According to AGO, the Case Management Steering Committee has developed a procedure for the Case Management System which is applicable. MEC Secretariat has not received a copy of the procedure.
40	Comprehensive case management database accessible by relevant justice sector agencies implemented	40.1	AGO	Expansion of access to the AGO case management system to all law detection agencies, departments of the AGO and the courts.	CMS	(15 Dec. 2013) - Only the representatives of the eight justice institutions have received access to the CMS, not all departments of detection and investigation agencies.	(31 Dec. 2015) - According to AGO, the CMS is implemented in 28 provinces including Kabul, Herat, Balkh, Nangarhar, Kunduz, Khost and Kandahar. However, using the CMS actively and efficiently is subject to different challenges (e.g. lack of electricity, internet access and trained staff).
		40.2	AGO	Database incorporates all criminal investigations, charges, and outcomes with unique identifiers for corruption and land usurpation cases developed	CMS	(15 Dec. 2013) - All criminal investigations, charges, and outcomes have not been incorporated into the database, and also, there is no database for land usurpation cases so far.	(31 Dec. 2015) - A summarized report of all cases entered from the beginning till 4 April 2015 was shared with MEC which includes 133923 cases from 34 provinces. The list indicates, that corruption and land usurpation cases are not separated from others
41	Case management governance structures established and operational to enhance cooperation amongst law enforcement agencies	41.1	AGO	Steering Committee comprised of the AGO, courts, MOJ, AIBA, MOD, HOO, NDS, and MOJ established with clear terms of reference for identifying case backlogs, the reasons for delays and solutions to those problems.	CMS		(31 Dec. 2015) - The Steering Committee includes all relevant institutions which signed a MOU that includes the duties of all members.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
42	Status, causes for delay, and reasons for dropping cases of corruption and land usurpation referred to the AGO assessed	42.1	AGO	Steering Committee compiles statistics of cases referred to the AGO, cases resolved by the AGO, and cases prosecuted in the courts with details related to zones, type of offense, length of time for proceedings, and final outcome.	CMS	(15 Dec. 2013) - The cases sent by justice institutions to the AGO are entered in the CMS with all details and outcomes. However, there have been a large number of cases referred from the SAO, HOO and MOI to the AGO for investigation that have not been registered.	(31 Dec. 2015) - A summarised report of all cases entered from the beginning till 4 April 2015 was shared with MEC which includes 133923 cases from 34 provinces. Cases are classified by the entering institutions e.g. MOI, AGO, Courts, NDS, HOO, MOJ, MOD, Counter Narcotics including the time line of all cases.
43	Effective investigation of cases referred to the AGO	43.1	AGO	AGO investigates the cases in a timely manner and provides regular updates to detection agencies on the progress of their investigations.	Case Proceedings	(15 Dec. 2013) - Cases have not been investigated in the given time, and the detection agencies have been updated on the progress of investigations very rarely.	(31 Dec. 2015) - According to the AGO, the Attorney General has referred all cases to the courts after completion of the investigation process. Also, the detection agencies are officially informed about the progress in the prosecution process. However, some detecting agencies are not updated by AGO on the progress of the referred cases. For instance, SAO referred 8 cases in 1392 and 10 cases in 1393 to AGO and received update only on one case.
		43.2	AGO	AGO investigation of all potential Kabul Bank perpetrators, beneficiaries, and participants in the fraud.	Kabul Bank	(15 Dec. 2013) - 21 people including the two main stakeholders investigated and indicted but the politically exposed stakeholders have not been investigated. This, despite MEC's recommendations that all potential suspects of crime be investigated.	(31 Dec. 2015) - AGO investigated most of the accused individuals in Kabul Bank case, including 11 persons who were convicted by the Appeal and subsequently by the Supreme Court. These individuals have served their term in prison and are released, except the two main shareholders and borrowers of KB. 16 individuals, who were identified by the Court as the accomplices of the perpetrators in the crime include, former managers and supervisory board members, shareholders as well as the former governor of DAB. All of them are still abroad and AGO, MOI (Interpol), MOFA, NDS and other involved institutions have not been able to have them extradited for their trial in Afghanistan. The assets of 12 major Kabul Bank debtors have been frozen by the AGO and some of them have signed instalment agreements with the KB Receivership to pay back their outstanding liabilities.
44	Effective prosecution of cases referred from the AGO to the courts	44.1	Supreme Court	Courts hear and decide all cases in a timely manner.	Case Proceedings	(15 Dec. 2013) - Cases are not being heard in the given time, and the relevant agencies are updated on the progress of cases very rarely.	(31 Dec. 2015) - According to the official response of the Supreme Court, the courts are dealing with all cases on time. However, in practice a lot of cases are pending in the courts for several years.
		44.2	Supreme Court	Court proceedings in the Kabul Bank case to include a hearing of evidence including expert evidence	Kabul Bank	(15 Dec. 2013) - No expert evidence has been heard in the Tribunal, although there has been ample opportunity for the Court of Appeal to use its broad scope under Afghan laws to properly consider the volume of evidence.	(31 Dec 2015) - MEC staff attended the hearing of the Court of Appeal to oversee the process. Two consultants of KROLL - the company that conducted a forensic audit of Kabul Bank and assisted the Receivership on asset recoveries - were present. One of them made a statement at the Court but he was not asked any further questions. The findings of the forensic audit have not been taken into proper consideration.

No.	Indicator	No.	Institution	Recommendation	Sec.	Baseline	Status
45	Comprehensive judicial capacity building programs introduced	45.1	Supreme Court	Capacity of current judicial staff systematically assessed to identify training needs	Capacity Building Judges	(15 Dec. 2013) - Court drafted a plan which identifies the training needs for prosecutors.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations.
		45.2	Supreme Court	Capacity training developed and implemented with the support of donors based on the assessed need	Capacity Building Judges	(15 Dec. 2013) - A lot of training programs have been provided by donors without taking into consideration Supreme Court assessments or needs but some officials seemed to be happy with the programs.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations.
46	Enforcement of all judicial decisions and orders	46.1	Supreme Court	Develop and implement clear procedures for referring and tracking judgments and orders	Case Proceedings	(15 Dec. 2013) - No clear reporting mechanism exists on enforcement of decisions and orders; only the ICPC identified the process of enforcement through the AGO by the MOI.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations.
		46.2	Supreme Court	Develop and implement clear procedures for the referral of delinquent orders to the courts for further proceedings	Case Proceedings	(15 Dec. 2013) - No clear reporting mechanism exists on enforcement of decisions and orders; only the ICPC identified the process of enforcement through the AGO by the MOI.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations.
		46.3	Supreme Court	Effective recovery of Kabul Bank assets, including more effective mutual legal assistance measures	Kabul Bank	(15 Dec. 2013) - Assets and loans have not been recovered completely, and no legal mutual assistance measures have been seen so far.	(31 Dec 2015) - Of the \$988 million embezzled money in the Kabul Bank Case, approximately \$250 million has been recovered so far, \$98 million of interest was waived by a Presidential Order of the former President, \$14 million was discounted by the Incentive Procedure of the current Government. Furthermore, installment agreement have been signed with the debtors about \$ 160 million, but the legal status of an huge part of this amount is not clear yet due to the cancellation of the Smart City Contract. Additionally, assets worth approx. \$ 47 million have been frozen in Dubai.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
47	Standards and procedures for transferring criminal cases from one province to another clarified and enhanced	47.1	Supreme Court	The Supreme Court develops criteria and transparent procedures to apply to the transfer of cases	Case Proceedings	(15 Dec. 2013) - The Law on the Structure and Authority of the Courts has yet to be reformed, despite a recommendation issued through MEC; impunity remains rampant.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations
48	Court and administrative tribunal proceedings conducted publicly	48.1	Supreme Court	Courts publish hearing schedules in advance to notify the public of upcoming hearings	Case Proceedings	(15 Dec. 2013) - Most of the proceedings are conducted publicly in courts. Some information is published in Mizan Magazine.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations
		48.2	Supreme Court	Public access granted in all hearings in accordance with the law	Case Proceedings	(15 Dec. 2013) - Most of the proceedings and orders are conducted publicly.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations
49	All judgments of court and administrative tribunals published	49.1	Supreme Court	All court judgments easily accessible online and available to the public in hard copy	Case Proceedings	(15 Dec. 2013) - Some judgments are published in Gaza Magazine, but it is difficult to obtain hard copies.	(31 Dec 2015) - MEC's Secretariat was unable to find out the implementation status of its recommendations despite several attempts to contact the Supreme Court via phone calls, e-mails and physical approach. MEC Secretariat shared once again its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations
50	Comprehensive assessment of Wasaaq Department conducted	50.1	Supreme Court	Assessment conducted to identify gaps / weaknesses, including high number of discretionary transactions, in the Wasaaq system.	Wasaaq	(30 March 2015) - No assessment conducted yet	(31 Dec 2015) - MEC Secretariat shared its recommendations with the Supreme Court through an official letter on November 1st 2015. Subsequently, the Secretariat visited the Supreme Court and asked for the implementation status. The Supreme Court declined to provide any information regarding the implementation of MEC's recommendations

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
51	Methods developed for the valuation of the type and quality of goods	51.1	MOF/ACD	ACD and relevant quality assurance entities including ANSA & MOPH develop and implement a policy for the verification of goods being imported	Customs	(15 Dec. 2013) - Methods exist but are not streamlined or coordinated, and are poorly implemented.	(31 Dec. 2015) - Based on Article 24 of the Customs Law, a new procedure for the use of the valuation module of the ASYCUDA system was developed and shared with MEC. The mention system is implemented in Kabul, Nangarhar, Kandahar, Herat and Aqina border. Additionally, ANSA has signed a 5-year contract with GeoChem (1391-1396) which includes the implementation of 6 fuel quality control labs in Afghan borders (Hairatan, Tor-Ghondi, Islam-Qala, Aqina, Farah and Nimrooz). A big part of the fuel is imported through the mentioned borders, the fuel imported through Sher-Khan border, is tested in Hairatan. ANSA also installed construction material quality control labs in Kabul, Herat and Nengrahar provinces. However, due to technical problems, e.g. lack of electricity and proper space, these labs are not active yet. The quality of food, cosmetics and pharmaceuticals is tested by MOPH, the quality of agricultural items is tested by MAIL.
52	Methods for verifying customs data by cross referencing data from bordering countries	52.1	MOF/ACD	Afghanistan pursues agreements and systems for the sharing of electronic customs information with neighbouring countries	Customs Data Sharing	(15 Dec. 2013) - Data is currently not being shared.	(31 Dec. 2015) - Offices are established in Kabul and Nangrahar with the support of UNODC, in order to share information on drug trafficking. Such offices will also be established in Hairatan by end of 2015 and Sher-Khan Bandar by end of 2016. GoIRA has signed a bilateral agreement with Pakistan (APTA) and a trilateral agreement with Tajikistan and Pakistan (APTTICA) in the past. Also, an agreement on custom data sharing has been signed with Tajikistan. Additionally, MOF has signed an MOU with Iran, but the MOU has not been sent to MOF by MOFA so far. Additionally, in this regard draft MOUs between Afghanistan and UAE and Afghanistan and Uzbekistan as well as Afghanistan and Turkmenistan has been prepared and sent to these countries.
		52.2	MOF/ACD	Afghanistan pursues gaining access to customs information from neighbouring countries through informal means	Customs Data Sharing		(31 Dec. 2015) - According to its 5-year strategic plan, which was shared with MEC, the ACD plans to sign MOUs with the neighbouring countries for the purpose of information sharing.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
53	Appropriate technology introduced at borders and checkpoints for inspections	53.1	MOF/ACD	All major checkpoints and borders, particularly those in Turkham (Nangrahar), Hairatan (Balkh), Sherkhan Bandar (Kunduz), Aqina (Jozjan), Torghondi (Herat), Islam Qala (Herat), Abu Nasar Farahi (Farah), and Spinboldak (Kandahar), equipped with technology (scanners, barcode, x-ray, etc.) to ensure accuracy of data entered	Customs Technology	(15 Dec. 2013) - The ACD has installed the ASYCUDA automated system at 11 customs facilities. MEC has observed that the system is not being properly used where it has been implemented.	(31 Dec. 2015) - The former version of the ASYCUDA++ has been replaced with the new ASYCUDA-WORD which is being used at most customs locations in the country. Currently, ASYCUDA-WORD is being used in Kabul, Nangrahar, Kandahar, Balkh and Aqina borders. According to MOF's second 100 day plan, the system will also be installed in one of the three borders: Kabul Airport, Nimroz or Khost. However, the Barcode system and x-ray are not implemented in Afghan Customs Authorities yet.
54	Mobile Task Forces set up to check quantities and qualities of goods	54.1	MOF/ACD	Border areas and urban centres identified that would benefit from the deployment of mobile task forces	Customs MTF	(15 Dec. 2013) - NDS working group requested the President to establish MTFs, but the request was reportedly not accepted by the Office of the President.	(31 Dec. 2015) - ACD has Mobile Unites in 11 Provinces: Kabul, Herat, Nangrahar, Kandahar, Khost, Badakhshan, Balkh, Jozjan (Aqina), Kunduz, Nimroz, Farah. ACD has also a Mobile Directorate in Kabul. The Mobile Unites are composed of the ACD employees only. According to the report of the Mobile Unite which has been shared with MEC, 82.7 Million Af\$ of custom violation has been identified and reported to ACD.
		54.2	MOF/ACD	Mobile task forces established with appropriate human and financial resources to ensure effective performance	Customs MTF	(15 Dec. 2013) - NDS working group requested the President to establish MTFs, but the request was reportedly not accepted by the Office of the President.	(31 Dec. 2015) - The Mobile Directorate in Kabul has 25 employees including the director and two managers. The general managers of the Mobile Unites in the provinces have between 2 and 13 employees. These employees remuneration has included the salary, overtime compensation and per diem until 1393. For 1394, they are only receiving salary and overtime compensation.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
55	Only customs officers granted access to facilities and allowed to take part in the customs proceedings	55.1	MOF/ACD	MOF develops a mechanism to conduct surveys and spot-checks to identify unauthorized access to facilities and proceedings and refers illegal activity to the AGO	Customs	(15 Dec. 2013) - The ACD signed an MOU with the Afghan Border Police that limits their interference and distributed a letter to all customs departments prohibiting the interference of third parties, but there is still interference being observed from senior figures including governors, security commanders and other influential people.	(31 Dec. 2015) - Although a MOU has been signed between the ACD, MOI and Directorate 82 of NDS but according to ACD undue interference of the National Police, Powerful People, Governors and Provincial Chief of Police are still a challenge. Two measures that were effective in preventing undue interference in customs affairs are: The development of a Mechanism Module by the customs department which covers all 12 steps of the process of goods importation/exportation and the prevention of the interference of HOO, AGO and NDS in customs affairs. This decision is based on the Resolution No. 3 of the Council of Ministers dated 23.10.2014. The undue interference has decreased due to the above mentioned measures but has not disappeared. A copy of the Mechanism Module and the Resolution No. 3. were shared with MEC. Additionally, ACD has a Section of Prevention of Delinquency. The mentioned section has a 3-year strategic plan (1394 - 1396) and a work procedure; the strategic plan has been shared with MEC. The section assesses the cases though, but has not shared any information on whether any cases has been referred to AGO.
		55.2	MOF/ACD	MOF includes the number of the MOEC anti-corruption hotline on customs forms so that illegal interference can be reported	Customs		(31 Dec. 2015) - According to the ACD, since some of the customs forms are printed by the Print House of Securities (مطبعة صكوك) they will include the anti-corruption hotline of MOEC in fiscal year 1395 in these forms. For the time being, ACD will send the hotline number in a separate form to all customs departments and other involved entities of the customs affairs, so the number is available for all customers. Also, the hotline No. of HOO has been submitted to all customs departments and there is a complaints box in all government entities. Additionally, ACD has printed the anti-corruption hotline number of HOO on brochures and banners and put it in front of ACD.
56	Measures taken to estimate accurately revenue lost due to custom tax exemptions	56.1	MOF/ACD	Capacity of Exemption Unit database enhanced	Customs	(10 Feb. 2015) -The database for the Exemption Unit has been created for a probationary period but lacks sufficient capacity.	(31 Dec. 2015) - The Customs Directorate with the support of UNCTAD has launched the new "Exemption Automation System" which is currently in a probationary use. According to the Customs Directorate, there are a number of challenges in the application of this system including lack of cooperation of the relevant ministries (especially MOFA), lack of capacity in the relevant ministries and lack of interest of the exempted institutions (especially Military Forces and US Embassy). MEC Secretariat has practically observed the new system and obtained two copies of exemption forms. Besides, the Exemption Section has completely established the "Exemption Automation System" in its scope of authority and all received exemption forms are registered in the system.

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57	Mining policies developed and implemented to operationalize Minerals Law, including anti-corruption provisions	57.1	MOMP	Bidding procedures outlined in detail	Mining Contracts	(15 Dec. 2013) - Draft law allows for combined license bidding, but contains no details of the bidding procedures.	(31 Dec. 2015) - The new leadership of MOMP is currently amending the latest version of the Minerals Law, (published in the official Gazette No. 1143, dated 25.05.1393) for further enrichment. Two chapters of the Mining Regulation is devoted to bidding. The Bidding Regulating itself is under development and its completion depends on the enactment of the amended Minerals Law
		57.2	MOMP	The method for setting royalties and the basis on which they are to be calculated clearly described	Mining Contracts	(15 Dec. 2013) - Draft law does not mention how and on what basis the royalties will be calculated.	(31 Dec. 2015) - MOMP is currently working on the draft mining financial regulation in accordance with Article 1 16 of the Mining Law. This regulation will cover royalties, minimum percentage of royalties, timeline for paying the royalty, etc. Additionally, the setting method of royalty is in accordance with international best practice and country needs. For example, the international max. royalty for copper is 12 % and the Anak Copper royalty was determined 19.5%, according to MOMP. The completion of the mining financial regulation depends on the enactment of the amended Minerals Law. Additionally, according to the MOMP, the ministry is currently working on a draft document called "Reform of the Mining Financial System"
		57.3	MOMP	Communities are given a role in monitoring mining activities	Mining	(15 Dec. 2013) - Communities only consulted after licenses have been issued and are not involved in monitoring activities.	(31 Dec. 2015) - According to MOMP, there are no provisions of local community monitoring role in the relevant legislations. However, the "Mining and Petroleum Resources Management Advisory Council" is established with the participation of representatives from Provincial Councils, CS, University lecturers and economic experts. The Council has held its first session and shared the minutes of the session with MEC. Additionally, a "Community Development Agreement" is supposed to be developed to ensure people's participation in mining activities. The completion of this agreement is depending on the amendment of the "Social Policy of the Mining Affairs", which is currently under review.

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58	Internal capacity development strategy developed and implemented	58.1	MOMP	Strategy includes both short and long term capacity building components	Capacity Building Mining	(15 Dec. 2013) - Unclear whether concise capacity development strategy exists, but both short and long term capacity building components exist.	(31 Dec. 2015) - A needs assessment has been conducted, based on which a capacity building strategy has been developed. The strategy encompasses mid-term management training programs and long-term scholarship programs to Japan and Australia. Additionally, 64 employees have been enrolled in private universities and on-the-job trainings provided all over the country. Further 24 employees have been introduced to the Dunia University's "Graduate Management Training" and 20 female employees have been introduced to Mashal University's Bachelor Program with the support of GIZ. The participants list was shared with MEC's Secretariat.
59	Highly qualified external lawyers used until such time that internal capacity is developed	58.2	MOMP	Strategy includes mechanisms for attracting and retaining qualified staff and conforms with the Civil Servants Law.	Capacity Building Mining	(15 Dec. 2013) - Attracting and retaining qualified staff is problematic. Unclear whether concise capacity development strategy exists or to what extent it conforms with the Civil Servants Law.	(31 Dec. 2015) - Employees returned after completing their scholarship programs are attracted and reintegrated through the CBRF-Program with the support of the IARCSC. MOMP is planning to extend the expiration date of the CBR-Program from 2017 to 2019. For example, the Director of the Fuel and Gas Survey of North Afghanistan has been hired and 32 key positions have been announced through CBR.
60	Higher levels of mining revenue reporting to capture a majority of mining revenue and mining companies in Afghanistan	59.1	MOMP	MOMP identifies required specialists and secures their services for as long as necessary	Capacity Building Mining	(15 Dec. 2013) - Capacity expanded through external lawyers (paid for in part by the World Bank), but gaps remain.	(31 Dec. 2015) - According to the official response of the MOMP, attracting and retaining qualified staff is a priority of the Ministry. For example some law experts have been hired in the legal affairs department of MOMP with the financial support of USAID. Additionally, the Ministry was planning to hire an international expert to provide trainings on financial affairs of the mining sector and draft a mining financial regulation. However, the international expert has not been hired yet.
61	IT systems utilized to sufficiently monitor financial transactions	60.1	MOMP	Reporting threshold captures majority of mining companies	Mining	(15 Dec. 2013) - Threshold yet to be lowered.	(31 Dec. 2015) - According to the 1390 report of AEITI the threshold for reporting purposes is 2.5 million Af\$ in which the revenue of 16 companies was published. According to AEITI, in the report of 1391-1392, the revenue of 10-14 companies will be published, which makes up around 97% of the total mining revenue. The mentioned report has not been finalized and published yet.
61	IT systems utilized to sufficiently monitor financial transactions	61.1	DAB	FINTRACA acquires and implements with the support of the international community electronic systems that allow for the automatic and instantaneous reporting of suspicious transactions and large cash transfers when initiated by a commercial bank	AML	(15 Dec. 2013) - An international donor has promised to support FINTRACA in acquiring the necessary banking software, but the assistance has not been provided yet.	(31 Dec. 2015) - FINTRACA has raised the issue of using IT systems at the Asia Pacific Group annual meeting and requested international support in this regard. As FINTRACA did not receive the required support, its IT specialists designed a new IT system, which is currently being used. The established system solved the problems to some extent but does not meet all international requirements. For instance large cash transactions of the banks cannot be tracked on a real time bases.

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62	Policy on currency outflows at airports and borders developed and effectively implemented	62.1	DAB	ACD develops policy in close consultation with FINTRACA, MOI, DAB, NDS and the international community that requires the recording of the exportation of more than \$10,000 per person, including information on the source of the currency, and the reporting of the information to FINTRACA.	AML		(31 Dec. 2015) - Based on Article 7 of the AML Law, FINTRACA has drafted the Regulation on the Transfer of Money, Securities and Marketable Instruments From Afghan Borders, in close cooperation with Customs Department of the MOF which was approved by the Council of Ministers in April 2015 and published in the official gazette No. 1170. However, registering the money outflow is effectively enforced on regular passengers but there is still concerns in the VIP section. MEC staff interviewed all relevant officials at the Kabul Airport who are involved in preventing money outflow including representatives of FINTRACA and visited the facilities at the Departure and Arrival Areas as well as the VIP Area. The Kabul airport is equipped with high-tech scanners (Rapiscan 628 XR) that can detect money, narcotics, antiques, etc. As a result, the ability to detect illegal money outflow has increased by 80% to 90% compared to previous years. The VIP Area is equipped with scanners, border police and immigration officers. All VIPs are registered and the list of VIP passengers is shared regularly with the border police and MOI. Passengers carrying cash exceeding the limit without knowledge of the limits are distributing the money among accompanying family members. In case of hiding the money to carry the money illegally out of Afghanistan, cases are referred to the AGO and the money is sent to DAB until a decision made by the judicial authorities.
63	Enhanced cooperation between FINTRACA and other government agencies	63.1	DAB	Regular coordination and information sharing meetings held to effectively detect and investigate financial crimes	AML	(15 Dec. 2013) - MOU prepared but waiting to be signed.	(31 Dec. 2015) - FINTRACA recognizes the need for regular coordination meetings, which is also required by Article 33 of the AML Law. However there are no regular coordination meetings, the 11 relevant institutions meet on an ad hoc basis. According to FINTRACA, coordination meetings will be held on a regular basis from now on.
64	Capacity building programs in fraud detection and suspicious transactions implemented	64.1	DAB	International community support a program for the provision of technical assistance and training to FINTRACA, AGO, DAB (FSD), and NDS	AML	(15 Dec. 2013) - Some capacity building programs exist, but not enough to improve detection of fraud and suspicious transactions.	(31 Dec. 2015) - A specified budget for capacity building has been granted to FINTRACA and the Financial Supervision Department (FSD) through Canada and the employees of the two units have received relevant training sessions. Additionally, based on DAB's request, the IMF has provided training to FINTRACA and FSD which was joined by representatives of AGO as well. Furthermore, the embassies of USA and UK in cooperation with the FINTRACA have conducted some seminars on law enforcement which will be continued in the future. Additionally, a workshop called "Introduction to Standards of Anti-Money Laundering and Combat of Financing Terrorism" has been provided on October 7th 2015 for 250 Money Market Dealers (Sarafan) in Kabul.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
65	AISA's legal status is clarified to ensure transparency and accountability	65.1	AISA	Private Investment Law amended to clarify that AISA is exclusively the office of the High Commission on Investment and subject to all laws governing public institutions, particularly with regard to budgeting, reporting, auditing, and hiring procedures	AISA	(15 Dec. 2013) - Status remains unclear.	(31 Dec. 2015) - According to the Resolution #3 § 6 of the Council of Ministers dated 01.08.1393, the acting Minister of Commerce and Industries and the acting Minister of Justice, under the chairmanship of the acting Minister of Finance, are tasked to review the legal status of AISA considering MEC's reports and submit the final decision draft to the Council of Ministers. The representatives of the mentioned Ministries met twice and prepared a report which was submitted to AOP on 7th of April 2015. Their findings are basically: 1) AISA's legal status as a Limited Liability Company is in conflict with the Corporation & LLC Law. 2) AISA as an LLC can not be involved in issuing licenses on behalf of the Government. 3) In accordance with Article 42 of the Constitution and Article 11 of the Public Finance and Expenditure Management Law, the revenue of issuing and extending business licenses should go to the designated official bank account of the Government. As a result, the delegation proposed to incorporate AISA within the MOCI with independent activities and amend the Private Investment Law accordingly. However, the representative of MOEC was insisting that AISA remains an independent budgetary unit with new legal status and declined to sign the report submitted to AOP. Additionally, the new leadership of AISA sent a proposal on AISA legal status to the President on 25th of August 2015 for approval. According to this proposal, the best option for AISA is to remain a Limited Liability Company with government institutions as its shareholders. The Presidential Office has not approved the plan yet. AISA intends to amend the Private Investment Law after the approval of the proposal.
66	All previous and future decisions and meeting outcomes of the High Commission on Investment published	66.1	AISA	High Commission on Investment publishes all previous and future decisions including AISA performance reviews, budget approvals, work plans, financial reports, and audit results on AISA's website	AISA	(15 Dec. 2013) - Materials yet to be published.	(31 Dec. 2015) - AISA has published all of the resolutions and decisions of the High Commission of Investment on their website (http://www.aisa.org.af).
67	The legitimacy of the transfer of responsibility for industrial parks is reviewed	67.1	MOCI	MOCI reviews the legitimacy of the transfer of MOCI's responsibility for industrial parks to AISA together with the MOJ and MOF and submits the results to the Council of Ministers	AISA	(15 Dec. 2013) - Review yet to be conducted.	(31 Dec. 2015) - The transfer of Industrial Parks to AISA is based on Resolution #1 of the High Commission on Investment dated 03.08.1391 and Resolution #31 of the Council of Ministers dated 08.08.1391. The review on the legitimacy of the transfer has not been conducted yet. AISA sent the "Proposal Regarding Legal Status of AISA and Establishment of One Stop Shop for Enterprise Licenses" to the Presidential Office for approval. According to the Proposal, the management, investment promotion and maintenance of the industrial parks should be the responsibility of AISA while the fee for land is transferred directly to the governments account. The cost of infrastructure should be burdened on the investors and spent by the High Commission of Investment, while AISA charges a fee specified by the Commission to cover its expenses. The mentioned proposal is not yet approved by the President.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
68	Licenses of active companies are registered with the Central Business Registry and renewed regularly according to legal requirements	68.1	MOCI	Licenses of firms reviewed regularly	Company License	(15 Dec. 2013) - Review of registered companies yet conducted.	(31 Dec. 2015) - The Central Registration Directorate of MOIC has a database of 130,000 licensed companies. According to the MoU signed between MOIC and MOF, an online system will be established which allow the MOIC to verify the tax payment of all companies in real time. This will help in preventing faked and forged tax reports. Additionally, the mentioned system, which will allow both ministries to generate company statistics, is not active yet.
		68.2	MOCI	Licenses of active firms renewed, licenses of inactive firms revoked	Company License		(31 Dec. 2015) - A commission consisting of the representatives of MOCI, MOF, MOJ, MOEc, ACCI and AISA was established on 13th of July 2015, which prepared a proposal regarding companies with outstanding tax liabilities of several years and expired licenses. According to the proposal, which is not yet sent to the Council of Ministers, companies which have neither paid their tax liabilities nor renewed their licenses between 1381 and 1389, their names should be deleted from the list of licensed companies and their licenses renewed only if they pay their entire tax liabilities. Companies with delay in renewal of license and outstanding liabilities between 1389 and 1392, should pay a fine of 10,000 Af\$ p.a. and their entire tax liabilities in order to renew their license. Additionally, companies can freeze their license for two years and reactivate it thereafter. The license will be revoked if the company does not reactivate it after two years. This proposal has not been sent to Council of Ministers for approval.
69	DBI action plan modified to include anti-corruption considerations	69.1	MOCI	MOCI reviews DBI action plan to assess whether planned activities result in vulnerabilities to corruption	DBI	(15 Dec. 2013) - Draft DBI action plan updated but unclear whether anti-corruption principles were introduced.	(31 Dec. 2015) - The Directorate of Private Sector Support of the MOCI with the support of WB has recently hired an advisor to assist in the reform of the DBIs. This reform is covered in the second 100 day plan of the MOIC. According to the plan, the DBI indicators of the WB should be reviewed and incorporated into the reform proposal with special consideration of the situation in Afghanistan.
		69.2	MOCI	DBI modified and measures developed to maintain friendly business environment without reducing vulnerabilities to corruption	DBI		(31 Dec. 2015) - The new Minister has tasked the Directorate of Private Sector Support to draft a revised version of the DBI plan which is supposed to be prepared soon. Drafting a new reform proposal regarding DBI is included in the second 100 day plan of the Ministry.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
70	Blacklist of contractors maintained and shared by key donors and relevant national and international entities	70.1	International Community	Key donors (namely USA (USAID), United Kingdom (DIFID), EU, Germany, Japan, India and ISAF) and IFIs (such as the WB, IMF, and other development banks), develop mechanism for listing contractors who have been found to engage in fraudulent or corrupt activity	Blacklisting	(15 Dec. 2013) - Contractors have been blacklisted by different entities in the past.	(31 Dec. 2015) - According to USAID, in case their contractors and implementing agencies are involved in fraud or corruption, they will be identified through monitoring and audit and blacklisted. No further information or documents have been shared with MEC. Also, MOF does not have any information about the blacklist of the donors.
		70.2	International Community	Blacklist updated regularly to ensure accuracy	Blacklisting	(15 Dec. 2013) - Unknown whether and how regularly blacklists are updated	(31 Dec. 2015) - According to the information provided by some of the donors, the blacklist is being updated regularly but no further information of documents have been shared with MEC.
71	Blacklist of contractors made publicly available	71.1	International Community	Key donors publish blacklists in a prominent spot on their websites	Blacklisting		(31 Dec. 2015) - MEC Secretariat has visited the websites of key donors and could not find any blacklists.
72	MoU signed between MoF and international key donors	72.1	National Procurement Authority	MoU on blacklisting companies signed among MoF/PPU and international key donors in order to unify and centralize blacklisting system	Blacklisting	(10 Feb. 2015) - The Procurement Policy Unit (PPU) within MOF is the only single authority for blacklisting companies, however there are other government and non-government entities that maintain blacklisting databases	(31 Dec. 2015) - According to the Presidential Orders No. 60 and No. 72, the PPU is merged with the General Directorate of National Procurement of AOP. According to the General Directorate of National Procurement, the 5-year national procurement strategic-plan will include a MOU with key donors on a unified and central blacklist of companies.
73	Entity identified to carry out regular reviews with clear terms of reference	73.1	MOEC	MOEC and MOJ develop terms of reference for detailed review of NGOs and social organizations that cross-references their activities with their registered mandate	NGO	(15 Dec. 2013) - TORs yet to be developed	(31 Dec. 2015) - According to Article 14.1.2 of the NGO Law, the statute of each NGO should specify their objective and activities. However, no TORs have been drafted which would allow a comparative analysis of the NGOs objectives and activities.
		73.2	MOEC	MOEC and MOJ conduct tendering process to identify appropriate, competent and independent entity to conduct the review	NGO		(31 Dec. 2015) - The Analysis and M&E department is responsible for collecting and analyzing the reports of all NGOs. However, the process to identify appropriate, competent and independent entity to conduct the comparative review has not been conducted. According to the NGO's Department of MOEC the Ministry has not the human resources to conduct the comparative analysis of the NGO's activities and their scope of work.

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74	Results of the review are published online for each NGO	74.1	MOEC	Regular reports published online	NGO	(15 Dec. 2013) - Reports yet to be published.	(31 Dec. 2015) - Each active NGO is obliged to prepare their reports every six months. A blank copy of the reporting form has been shared with MEC. The Homepage of the MOEC contains the lists of all NGOs including name, abbreviation, registration number date and location, contact number and e-mail. However, the reports of NGOs have not published on the website.
75	A publicly available NGO database is created and regularly updated	75.1	MOEC	Database includes information on NGO administrators	NGO	(19 Mar. 2014) - Database does not include this information.	(31 Dec. 2015) - The list of national and international NGOs on MOEC's homepage as well as the online database of NGOs include the name of administrators but in the online database the name are not publicly available. The information which is publicly available include: Name, registration number, registration date Contact number and Email. The classified information which is only accessible by the eligible employees of MOEC include: Name of the NGO's CEO, address, work objective in Afghanistan, number of the foreign and national employees, equipment, vehicles and financial reports.
		75.2	MOEC	Database includes information on NGO activities	NGO	(19 Mar. 2014) - Database does not include this information.	(31 Dec. 2015) - The list of national and international NGOs on MOEC's homepage as well as the online database of NGOs include the field of activity of NGOs but in the online database the field of activity is not publicly available. The information which is publicly available include: Name, registration number, registration date Contact number and Email. The classified information which is only accessible by the eligible employees of MOEC include: Name of the NGO's CEO, address, work objective in Afghanistan, number of the foreign and national employees, equipment, vehicles and financial reports.
76	Evaluation of revenues and expenses of communication companies	75.3	MOEC	Database includes information on NGO finances	NGO	(19 Mar. 2014) - Database does not include this information.	(31 Dec. 2015) - The online database of NGOs include information on NGO's Finances but this information is not visible for public users. The information which is publicly available include: Name, registration number, registration date Contact number and Email. The classified information which is only accessible by the eligible employees of MOEC include: Name of the NGO's CEO, address, work objective in Afghanistan, number of the foreign and national employees, equipment, vehicles and financial reports.
		76.1	MOF/MOCT	MoF conducts a comparative analysis of the audit reports and the corresponding tax documents of all communication companies for the years 2008 - 2012.	Regulation of Companies	(6 May 2014) - Communications companies are reporting minimal amounts of revenue and profit in financial statements/tax document. This, contrasts with the audited financial statements being filed with ATRA.	(31 Dec. 2015) - One of the main reasons which cause the difference between the tax statement and the audit report of the telecommunication companies is the difference between the Income Tax Law of Afghanistan which is applied for preparing the tax statement and the International Financial Reporting Standards which are used by foreign audit companies. MOF has conducted a comparative analysis of the telecommunication companies (Etsalait, Roshan, Afghan Telecom and MTN) for the years 2008 - 2012 and shared the report with MEC. The analysis indicates a general discrepancy between the income/expenses shown in the tax report and the audited financial reports of these companies. Only the tax and audit report of Afghan Telecom of 2012 do not show any discrepancy. MOF did not comment on the discrepancies.

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77	The appointment process of ATRA's board members is revised and reformed	77.1	MOCIT/IARCSC	MOCIT in cooperation with IARCSC develops procedures for vetting, short-listing and recommending members of ATRA's Board for appointment by the President based on the principles of competence, merit, equal opportunity and the needs of consumers.	ATRA	(6 May 2014) - ATRA's board is appointed based on the recommendation of the Minister of Telecommunication and approved by the President, which weakens the independence of ATRA and undermines the principle of equal opportunity for qualified candidates.	(31 Dec. 2015) - All 5 members of ATRA, including the chair and deputy of ATRA, are recently appointed. The chair of ATRA was proposed by MOCIT and appointed based on Presidential Order #765 dated 14 July 2015 while the deputy and other 3 members are appointed based on PD# 1206 and PD1446 dated 23 Sep. 2015 and 17 Oct. 2015. The mentioned PDs have been shared with MEC. According to the deputy chair of ATRA, all board members were interviewed by the President of Afghanistan. However, the appointment process of ATRA's board members is not revised and reformed yet.
78	Procedure for ATRA's Board converted to a regulation.	78.1	MOCIT	ATRA's board regulation clearly governs the meeting frequency, duration, quorum, decision making, and other related issues of ATRA's Board and Minister's Committee.	ATRA	(6 May 2014) - The Law for Regulating Telecommunication Services generally determines the duties and authorities of ATRA, but it does not specify the authorities and accountabilities of the director, deputy and members, quorum, measures to ensure ATRA's independence.	(31 Dec. 2015) - ATRA has a procedure for regulating the relevant affairs in place, which was developed based on Article 5.3 of the Law of Regulating Telecommunication Services. However, this procedure has not been upgraded into a regulation yet.
		78.2	MOCIT	ATRA's board regulation governs the use of the Telecommunications Development Fund in a transparent and accountable manner.	ATRA	(6 May 2014) - The collection and use of Telecommunications Development Fund is not regulated by legislation documents.	
79	VCA of the employees appointment process conducted	79.1	MOCIT/IARCSC	ATRA with cooperation of the IARCSC conducts a vulnerability to corruption assessment of its employee appointment process and implements measures to address identified vulnerabilities.	ATRA	(6 May 2014) - ATRA employees are not appointed by the IARCSC and are directly hired by ATRA, despite serving a public function. The salaries of ATRA staff are higher than that of other government staff and illegal interference have made appointments non-transparent.	(31 Dec. 2015) - ATRA asked the IARCSC through an official letter on 15.03.2015 to cooperate in conducting a Vulnerability to Corruption Assessment of ATRA's recruitment process, but the VCA has not been conducted yet. According to IARCSC, since ATRA is not part of the civil servants structure, monitoring the recruitment process and conducting a VCA is not the responsibility of the IARCSC. However, based on Article 4 of the Law of Regulating Telecommunication Services, ATRA is working within the MOCIT.
80	Clear and transparent terms and conditions for the procurement process and inventory management implemented	80.1	DABS	DABS develops stricter internal-control mechanisms and take accurate stock of its inventory	DABS		(31 Dec. 2015) - DABS manages its inventory and stock according to the asset management policy. Additionally, DABS has designed a new IT system with 12 modules, including an inventory management module with the support of USAID. The software has been designed and tested by DABS. A big part of the data has been entered into the new system which will go live in January 2016.

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81	A distinct procedure for the collection of unpaid electricity bills developed and implemented	81.1	DABS	DABS takes affirmative actions to collect unpaid debts by setting strict deadlines and imposing fines in case of violation.	DABS	(17 Sep 2014) - DABS has so far been able to recover only 248 Mill out of 2,137 Mill Afs of doubtful receivables. The remaining 1,889 Mill Afs are still pending	(31 Dec. 2015) - According to the information presented by DABS to the Cabinet dated Jun 2014, the unpaid electricity bills of public entities (2.07 billion Afs), private residences (2.64 billion Afs), commercial (1.25 billion Afs), and mosques and holy places (184 million Afs) until end of 1393 total amount to 6.15 Billion Afs. To recover these amounts the Cabinet made the following decisions: MOF was tasked to deduct the electricity budget of all budgetary units and send the fund to DABS's account. The identities of all private persons should be published if they fail to pay their bills within one week and their case should be referred to the justice and judicial authorities. MOI was tasked to identify those "powerful people" who decline to pay their bills or threaten DABS's employees and illegally tap electricity. Their electricity should be cut off and they should be refer to justice and judicial authorities. After the decision of the Cabinet, DABS has sent several official letters to MOF and held meetings with the Directorate of Budget. As a result, DABS has shared with MOF the list of public entities which have not paid their electricity bills for several years and asked MOF to settle the outstanding balances by end of 1394.
82	Technical and managerial capacity building program established for the Ministry of Public Works to manage and oversee projects, including short-term and long-term expertise	82.1	MOPW	Needs assessment conducted to identify gaps in capacity	Capacity Building MOPW		(31 Dec. 2015) - The new Minister of Public Work has established a committee to assess all resources of the Ministry including human resources, technical and managerial capacity and equipment. The Committee is supposed to identify gaps and report to the Minister. In addition, the Human Resources Strategic Plan is under work. A list of the contents of the plan has been shared with the secretariat of MEC. The plan includes an introduction and five sections in relation to the assessment of vulnerabilities, analysis of strengths and weaknesses, determine vision, mission and values, graphs of organizational chart of the human resource department and strategic plan for the development of human resource. This plan is to be designed and implemented for 4 years (2015-2018)

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83	Needs assessment for permanent and mobile quality control testing laboratories completed and laboratories established as needed	83.1	MOPW	Assessment carried out in every province to identify location of current and future infrastructure projects and prioritize the need for quality control testing accordingly	Infrastructure	(15 Dec. 2013) - Initial needs assessment reportedly conducted by the MOPW, but unclear to what extent and whether all provinces were considered.	(31 Dec. 2015) - Since the MOPW does not have projects in every province at the moment, there is a need to establish laboratories in seven zones (Kabul, Kandahar, Herat, Balkh, Kunduz, Nangarhar and Paktia). According to the Laboratories Department of MOPW, currently laboratory facilities are available in Kabul, Kandahar and Kunduz. Laboratory installation in Kabul, Kunduz, Balkh, Herat, Kandahar, Paktia and Nangarhar zones is part of MOPW organizational structure in 2014 and 2015, but this structure has not been approved yet.
		83.2	MOPW	Mobile laboratories established based on needs assessment	Infrastructure	(15 Dec. 2013) - The MOPW has decided to establish material testing laboratories for infrastructure projects in five provinces (Kunduz, Nangarhar, Herat, Kandahar, and Paktia) based on its needs assessment in the near future.	(31 Dec. 2015) - According to the proposed organizational structure for 2015, laboratories are considered for seven zones, however the proposed organizational structure has not been approved yet. According to Laboratories Department of MOPW a mobile laboratory is active in Kabul only. In addition, MOPW is currently monitors the implementation of 14 projects. Moreover, according to MOPW, contractors are obliged to provide required laboratory at the work-site where supervisory staff of MOPW use the aforementioned laboratories to assess the quality of the relevant projects.
84	Tender procedures ensure that construction companies meet minimum standards in their technical capacity	83.3	MOPW	Mobile laboratories sufficiently equipped, staffed and resourced to perform duties	Infrastructure	(30 Nov. 2013) - According to the deputy minister, the provincial laboratories are equipped and ready to begin operations, but the ministry does not have enough professional staff to operate the labs. They have included additional staff in their tashkil request for 2014.	(31 Dec. 2015) - According to the proposed organizational structure for 2015, laboratories are considered for seven zones, however the proposed organizational structure has not been approved yet. Currently, a mobile laboratory is active in Kabul which has been visited by the secretariat of MEC . Mobile lab lacks professional staff. Therefore, the personnel of Laboratories Department are being used to fulfill the duties.
		84.1	MOPW	Standards of technical capacity for construction companies clearly defined	Infrastructure		(31 Dec. 2015) - According to MOPW's report, prior to bidding process, in compliance with the procurement law and on the basis of estimated cost for each project, the minimum technical standards for construction are set in the bidding documents. The assessment team ensures the technical capacity of construction companies in the course of offer opening.

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85	Communication policy developed for the regular reporting of activities from work-sites	85.1	MOPW	MOPW develops policy identifying MOPW focal point for contractors to report to on a daily basis on their project activities and progress	Infrastructure	(15 Dec. 2013) - ARDS (MOEC) established a working group of relevant institutions to develop a daily reporting mechanism. Each institution will provide a draft mechanism to be combined into one unified reporting mechanism.	(31 Dec. 2015) - The Project Management Department is in contact with all contracting companies as a liaison department. The report on work progress is usually prepared monthly, if necessary, there is possibility of reporting on a daily basis too. The MEC Secretariat has visited the Projects Management Department and looked into a number of projects reports containing the information on the progress, quality and practical problems in the implementation of projects. According to the Projects Management Department, currently 14 projects are being monitored by supervisory teams comprised of representatives of the Projects Management, Quality Control, Laboratories and Project Survey Departments. List of 14 projects and a sample reporting form of one of the projects shared with the MEC Secretariat. In addition, according to MoPW around 66 projects funded directly by donors and being monitored by them.
		85.2	MOPW	MOPW ensures sufficient resources set aside for absorbing daily reports either by email or phone	Infrastructure	(15 Dec. 2013) - Comprehensive communication policy and reporting mechanism yet to be developed	(31 Dec. 2015) - MoPW is currently working on the establishment of MIS system. 40% of the establishment process has been completed. MEC Secretariat has visited the MIS office. Additionally, MoPW monitoring team is reportedly present on the construction site. The progress report is submitted to the Ministry on a monthly basis. In case of urgent issues, the Ministry is informed on a daily basis. Electronic facilities are available at the Ministry. According to MoPW, all reports are signed by the designated team and sent to the Ministry.
86	Comprehensive corruption-reporting mechanism developed and implemented	86.1	MOPW	Public awareness campaign conducted including posters at MOPW affiliated offices, radio and television spots, as well as newspaper announcements to introduce corruption-reporting mechanism.	Corruption Reporting	(15 Dec. 2013) - The MOPW is researching best practices with the help of MEC in order to establish the reporting mechanism.	(31 Dec. 2015) - An anti-corruption unit has been established and a complaints box is installed at the ministry. Additionally, the phone number of the secretariat of the Minister has been made available to customers and the website of the Ministry has been opened on Facebook. MEC secretariat has visited the ministry's complaints box. The notice on the box indicates that complaints box is opened every month by Minister.
		86.2	MOPW	Reported cases registered and duly investigated	Corruption Reporting	(15 Dec. 2013) - The MOPW is researching best practices with the help of MEC in order to establish the reporting mechanism.	(31 Dec. 2015) - According to MOPW, the ministry has referred the followings cases to Attorney General Office for prosecution in 1394: 1. The case of repairing ring road of Mazar e Sharif; 2. The misuse of high tonnage scales and four month delay in the payment of Torikham scale revenue; 3. 48 vehicles donated by the Ministry of Defense to MOPW have not been repaired. The copies of letters referring the aforementioned cases to Attorney General Office, shared with the MEC secretariat.

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87	Community-based monitoring mechanism developed and implemented	87.1	MOPW	MOPW develops a strategy to identify key CSOs and community groups to involve in training for monitoring and reporting	Project Monitoring	(15 Dec. 2013) - MRRD has a mechanism in place that provides training in the monitoring of small-scale projects, which they will expand and offer to staff of all ministries. Unclear whether training is also provided to community-based monitors.	(31 Dec. 2015) - MOPW is constantly in touch with the Afghan Engineer's Union, Architects' Union and Union of Afghanistan's Construction Companies to exchange information, opinions and viewpoints.
88	CoST initiative implemented in Afghanistan	88.1	MOEC	International community provides funds for functioning of the CoST secretariat	CoST	(15 Dec. 2013) - The CoST-Afghanistan program was officially launched at a press conference on October 23, 2013, but still needs funds for the establishment of the CoST-Afghanistan Secretariat.	(31 Dec. 2015) - ADB, GIZ and DFID have agreed to fund the CoST Secretariat. GIZ agreed to pay 30,000 USD for the scoping study of the project which will be paid to the two consulting companies. ADB and DFID agreed to fund the establishment of the Secretariat under the condition, that the Legal Status of the Secretariat be stipulated through a Presidential Order or Resolution of the Council of Ministers. MOEC does not have any proposals for the Council of Ministers in this regard. According to MOEC, this issue is not covered in the first and second 100 day plan of the Ministry. Additionally, the CoST International Secretariat has allocated 80,000 British Pound for establishment and equipment of CoST in Afghanistan.
		88.2	MOEC	Develop terms of reference for CoST that cover membership, meetings, scope of activities, and criteria for reviewing projects	CoST		(31 Dec. 2015) - TOR and an implementation action plan have been developed for regulating the activities of CoST Secretariat and shared with MEC. CoST's meetings are held quarterly with the participation of all 13 members representing Government Institutions, Private Sector, the Parliament and Civil Society. The quarterly reports of CoST has been shared with MEC. The scope of CoST's work is available on its homepage www.constructiontransparency.org
89	Database of all infrastructure projects created	88.3	MOEC	CoST reports regularly to the people, President, and National Assembly of Afghanistan	CoST		(31 Dec. 2015) - CoST's meetings are held quarterly with the participation of all 13 members representing Government Institutions, Private Sector, the Parliament and Civil Society. The quarterly reports of CoST has been shared with MEC but not published.
		89.1	MOPW	MOPW publishes a database on their website that includes information such as the donor/funder of the project, the general contractor, location, expected completion date, current status, and reasons for any delays	Project Monitoring	(15 Dec. 2013) - The MOPW has shared a list of road projects missing technical information with MEC, but there is no indication that a comprehensive database has been created.	(31 Dec. 2015) - MOPW is currently working on the establishment of MIS system. Once the establishment process is completed a comprehensive database will be developed. However the Ministry faces financial constraints in this regard. According to the capacity building section of MOPW, the procurement plan; registration of companies; database of information technology; human and financial resources have been entered to system and the ministry plans to assign a committee to complete the MIS system. Currently, there is no comprehensive database about the projects on the MoPW's website and just a list of projects completed in 2015 and report on the implementation of the 2nd 100-Day plan are available on the MoPW's website.

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90	Technical and managerial capacity building program established for the Ministry of Energy and Water to manage and oversee projects, including short-term and long-term expertise	90.1	MOEW	Program developed for the provision of technical assistance with the support of the international community to fill capacity gaps identified by the needs assessment with a particular focus on recruitment and training	Capacity Building MOEW		(31 Dec. 2015) - MOEW has conducted capacity building programs in internal audit, computer skills and English language within the Ministry. Additionally, MOEW has provided short-term trainings to 393 employees in 1394, which included: Water management, Irrigation and Design, Hydroelectricity, Industrial Electricity, Solar Energy Production, Solar Technology, Gender Management and Law awareness. The ministry has also sent 5 employees to Japan to obtain their Master Degree. List of the training sessions has been shared with MEC.
91	Technical and managerial capacity building program established for the Ministry of Mines and Petroleum to manage and oversee projects, including short-term and long-term expertise	91.1	MOMP	Needs assessment conducted to identify gaps in capacity	Capacity MOMP		(31 Dec. 2015) - The HR department of MOMP has conducted a needs assessment with the assistance of ASI (Adam Smith International) and shared the report of its findings with MEC. Based on this assessment there is a capacity gap in technical expertise of this Ministry.
		91.2	MOMP	Program developed for the provision of technical assistance with the support of the international community to fill capacity gaps identified by the needs assessment with a particular focus on recruitment and training	Capacity Building MOMP		(31 Dec. 2015) - MOMP has shared with MEC its capacity development report for the years 1390, 1391 and 1392. According to this report the Ministry has sent 33 employees to Japan, 1 to Germany, 10 to India 2 to Turkey for receiving their masters degree. Additionally, 350 Employees are sent to India, USA, China, South Africa, Poland, Pakistan, Iran, Finland, Turkey and Australia for short-term trainings. Additionally, 24 employees have been introduced to the Dunia University's "Graduate Management Training" and 20 female employees have been introduced to Mashal University's Bachelor Program with the support of GIZ.
92	Anti-corruption module developed and incorporated into curricula	92.1	MOE	Grades 1 to 12 include anti-corruption modules that sensitize students about corrupt acts and anti-corruption measures from an Islamic perspective	Anti-Corruption Modules	(15 Dec. 2013) - No anti-corruption module developed in the curricula of schools but a couple of anti-corruption issues have already been incorporated in the subjects.	(31 Dec. 2015) - Anti-corruption issues are partially covered in the curricula such as languages and religious subjects(Grades 1-12). For example, the religious education schoolbook of the 9th grade covers corruption prohibition and legitimate <i>Halal</i> earning of livelihood.
		92.2	MOHE	First-year university programs include anti-corruption modules that sensitize students about corrupt acts and anti-corruption measures from an Islamic perspective	Anti-Corruption Modules	(15 Dec. 2013) - No anti-corruption module developed in the curricula of universities but a couple of anti-corruption issues have already been incorporated in the subjects.	(31 Dec. 2015) - The MOHE instructed universities to include anti-corruption issues in their curricula. MEC Secretariat has received a copy of the official letters sent to the universities. As a result, the Department of Shariah of the Kabul University was tasked to include anti-corruption modules in the Ethics (Islamic Thaqafat). This subject is taught in all faculties but the department of Thaqafat finds it difficult to implement MEC's recommendation due to limited lecture time they can implement

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		92.3	MOHE	Anti-corruption modules made mandatory for students enrolled in business administration or other business degree programs	Anti-Corruption Modules		(31 Dec. 2015) - Anti-corruption modules are not part of the business administration students curricula.
93	Media campaign strategy developed and implemented	93.1	MOIC/RTA	National television channels support anti-corruption efforts by providing air-time for regular anti-corruption related programs, such as MOCIT public service announcements	Anti-Corruption Campaign	(15 Dec. 2013) - There is no anti-corruption program on national TV now, only some irregular interviews in the Good Morning Program.	(31 Dec. 2015) - National Radio and TV broadcast some anti-corruption related programs including speeches of religious scholars, interviews with relevant officials and anti-corruption messages. Previously, the National Radio TV had an anti-corruption program called Shafafiyat (Transparency), which was funded by HOO. But this program is not broadcasted anymore. Based on the report of National Radio and TV, 3 roundtables, 4 reports and 1 drama have been broadcasted on anti-corruption issues since last 3 months and will be continued in future.
94	Procurement Law amended to ensure consistency with international best practices and government-wide effective implementation	94.1	National Procurement Authority	Law ensures provisions included in public contracts explicitly limiting sub-contracting share	Procurement Law	(15 Dec. 2013) - Article 54 of the draft Procurement Law includes provisions that would restrict subcontracting to 20 percent of the total value of the contract.	(31 Dec. 2015) - The Procurement Law has been reviewed and amended by the National Procurement Authority. The law has been endorsed through PD # 75 dated 02.Sep. 2015 and promulgated in the Official Gazette # 1186 on 07.Oct. 2015. According to Article 36 of the new Procurement Law, a contractor can subcontract a part of the original contract under the following conditions: 1) The subcontracting has been enshrined in the Standard Bidding Document (SBD) and specified in the original contract. 2) Official written agreement of the relevant institution has been obtained 3) The sub-contract is not in contradiction to the original contract. Additionally, according to Article 36 (3) of this law, the conditions and limits of sub-contracting will be regulated in the Procurement Procedure. According to Article 101 of the Procurement Procedure, a contractor can subcontract up to 20% of the original contract amount, provided that provisions of Article 36 of the Procurement Law are met.
		94.2	National Procurement Authority	Law ensures that information about contractors and subcontractors made publicly available	Procurement Law		(31 Dec. 2015) - According to Article 42, 46 and 52 of the new Procurement Law, procurement entities are obligated to publish their contracts, including all contract details, on their homepage and other websites recommended by the National Procurement Authority. Additionally, the procuring entities are obliged to register their contracts with the National Procurement Authority.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
95	Appeal and Review Committee provided with additional resources	95.1	National Procurement Authority	Additional financial and human resources provided to ensure the effective functioning of the committee	Appeal and Review Committee	(15 Dec. 2013) - The PPU has appointed five initial committee members and plans to increase the membership to 21 experts through appointments from other institutions. Financial resources are unclear.	(31 Dec. 2015) - According to the Presidential Orders No. 60 and No. 72, the PPU was merged with the General Directorate of National Procurement within the AOP. The mentioned directorate has a review and complaint committee with three representatives of the General Directorate of National Procurement and each one representatives of ACCI, MOCI and the M&E department of AOP. The Chair of Committee is elected among the members. The administration of this committee, including financial support and other resources, is provided by the National Procurement Authority while the Working Procedure of the Committee is under development.
96	Increased independence of Appeal and Review Committee	96.1	National Procurement Authority	Terms of appointment provide increased independence for committee members and restrict their removal to situations of gross misconduct based on pre-established objective criteria	Appeal and Review Committee	(15 Dec. 2013) - Level of interference and counter-measures unclear.	(31 Dec. 2015) - The General Directorate of National Procurement has a review and complaint committee with three representatives of the General Directorate of National Procurement and each one representatives of ACCI, MOCI and the M&E department of OAA. The Chair of Committee is elected among the members. The administration of this committee, including financial support and other resources, is provided by the National Procurement Authority while the Working Procedure of the Committee is under development.
97	Enhanced awareness of the Appeal and Review Committee amongst domestic and foreign bidders	97.1	National Procurement Authority	Develop and send circular to all relevant partners including contractors, the CoST secretariat, and MOCI, outlining the committee's terms of reference	Appeal and Review Committee	(15 Dec. 2013) - There have been no substantive efforts to raise awareness of bidders of the PPU.	(31 Dec. 2015) - The Working Procedure of the Review and Appeal Committee is under development. According to the National Procurement Authority, this procedure will be sent to all procuring entities and relevant institutions after its approval.
98	All government institutions with procurement functions staffed with dedicated procurement specialists	98.1	National Procurement Authority	MOF provides regular technical training to dedicated procurement specialists	Procurement Staff	(15 Dec. 2013) - The PPU has representatives in all ministries to support the procurement process and to train procurement personnel. The PPU has also created a new department of capacity building and over 5,000 employees from various governmental institutions have been trained so far.	(31 Dec. 2015) - The National Procurement Authority has designed and conducted procurement trainings on a basic-, mid-, and high-level. In addition to the procuring entities, private sector employees can also participate in these trainings. The related documents and list of the participants are available on the website of the NPA. According to the announced lists, more than 5000 employees of procuring entities have been trained so far.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
99	Audited institutions follow SAO recommendations	99.1	SAO	Audit Law amended to include reporting mechanism to identify non-compliant institutions	Audit Law	(24 Mar. 2014) - The Audit Law has not been amended and penalizing people is not mentioned in the Audit Law.	(31 Dec. 2015) - The Audit Law has not been amended yet but SAO is planning to draft a mechanism for noncompliant institutions, called Tracking Procedure. A group of 13 technical members have been established to work on the mentioned procedure and finalize it until end of March 2016.
		99.2	SAO	Non-compliant institutions penalized	Audit Law	(24 Mar. 2014) - The SAO recommendations are implemented by some institutions, but most of the institutions do not take it seriously and don't apply them.	(31 Dec. 2015) - SAO recommendations are implemented by some institutions, but most of the institutions do not take them seriously. According to Article 21 of the new SAO Law, promulgated in March 2013, the followings are considered a violation of the mentioned Law and the offender will be referred to AGO: 1. Declining to provide documents and other information on due time 2. Delay in responding the official inquiries of SAO on due time 3. Delay in implementing Audit's Outcome and recommendations 4. Declining auditors access to the institutions 5. All other things that could delay or impede SAO's audit activities.
		100.1	All GOs	Departments responsible for the creation of audit plans established with clear terms of reference defining the scope of activities and providing for regular meetings	Internal Audit	(15 Dec. 2013) - Internal Audit Departments established within all of the ministries, but they don't have a comprehensive audit plans and terms of reference.	(31 Dec. 2015) - Internal audit departments exist in all government institutions but the departments do not work effectively due to low capacity and lack of support from the leadership of the relevant institution.
100	Functioning internal audit and oversight departments of government institutions	100.1	SAO	SAO recruits audit specialists to enhance the capacity of internal audit and oversight departments and provides regular training	Internal Audit	(15 Dec. 2013) - The Internal Audit departments doesn't have well trained personnel in conducting audits, they are just ordinary employees working as auditors.	(31 Dec. 2015) - According to SAO, capacity development of the internal audit departments is not part of its mandate. However, SAO provides technical support to the ministries. E.g. SAO conducted a 2-day training for the heads of audit departments of all governmental institution in 1392. Additionally, SAO provided a 1-day workshop on audit plans for the ministries in 1393.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
101	Institutions are identified, prioritized and audited based on risk factors	101.1	SAO	Detailed and in-depth financial and performance audit conducted of ARDS	Audit ARDS	(15 Dec. 2013) - Financial and performance audit not conducted due to lack of SAO personnel.	(31 Dec. 2015) - SAO included the audit of ARDS in its annual plan for the year 1394 (second quarter) which is completed. However, ARDS has been merged with other procurement bodies to the National Procurement Agency based on Presidential Order Nr. 16 dated 12.10.2014.
		101.2	SAO	Detailed and in-depth financial and performance audit conducted of the government funds provided to the Afghanistan Red Crescent Society	Audit Red Crescent	(24 Mar. 2014) - Audit not planned or conducted yet	(31 Dec. 2015) - According to SAO's official letter, Red Crescent is not willing to allow an audit by SAO since the ARCS's operations are being audited annually by the International Federation of Red Cross and Red Crescent Societies and by the Red Crescent internal audits. According to the ARCS, a special audit by SAO is possible if ordered by the President and agreed upon by International Federation of Red Cross and Red Crescent Societies.
		101.3	SAO	The Supreme Audit Office conducts an audit of all MOFA hiring decisions since 2005.	Audit MOFA	(30 May 2015) - Many serving MOFA officials were hired based on their familial ties to powerful individuals, and not because of their qualifications.	(31 Dec. 2015) - According to SAO, auditing the recruitment is not part of SAO's mandate.
102	Embassies and consulates of the IR of Afghanistan are audited regularly	102.1	SAO	The Supreme Audit Office should change the frequency of audits of Afghan embassies and consulates around the world from every five years to every two years.	Audit Embassies	(01 June 2014) - Audits of embassies and consulates of Afghanistan are conducted every five years.	(31 Dec. 2015) - According to SAO, due to lack of resources, conducting the audit of the embassies every two years is not possible. SAO is currently working on the audit plan of 1395. According to this plan, all embassies would be classified and audited in 3 categories based on their income and expenses as well as their vulnerability to corruption. Embassies and consulates of the first category would be audited every 2 years, those of the second category every 3 years and those of the third category every 5 years.
103	A forensic audit of the Telecommunication Development Fund is conducted	103.1	SAO	The Supreme Audit Office should conduct a comprehensive and in-depth forensic review of the collection and use of the Telecommunications Development Fund from its inception to the present. Inform MEC of its results, and publish a summary.	Audit TDF		(31 Dec. 2015) - According to SAO, auditing TDF started in September 2015 and will be completed soon.
104	Effective polling staff training plan created and implemented	104.1	IEC	Training plan developed and implemented that includes direct training by IEC for all district level polling staff	Election	(15 Dec. 2013) - The key staff members of the polling stations are going to be trained directly by the field coordinators at the district level while the supporting staff of the polling stations are going to be trained in each polling station. To ensure that the election staff properly understand the election procedures and have enough time allocated for practical work, particularly for the appropriate use of election forms, an extra day was added to all trainings compared with previous elections.	(31 Dec. 2015) - IEC has developed a guideline for training or trainers and shared a copy of the guideline with MEC. The IEC implemented a training program through the Directorate of Training and Capacity Building. 188 Trainers from 34 provinces have been trained during a 6-day training-session in Kabul regarding voting procedures and the counting of votes. These 188 trainers provided a 6-day training-session for 3,000 local field coordinators in their respective provinces. These 3,000 local field-coordinators provided a 5-day training session to 108,188 polling station staff, including registration employees, controllers and voting centre managers.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
105	Candidates register their campaign funds, assets, and expenditures, including their sources	105.1	IEC	Mechanism developed and implemented by the MOF and IEC to enforce the legal requirement on registering information that includes the source of campaign funds and assets	Candidates Assets & Resources	(15 Dec. 2013) - The Election Law obliges the candidates to register their movable and immovable assets upon issuing their request for nomination in the election. To ensure the implementation of this provision, the IEC demanded the candidates register their assets using the asset registration form prepared by the IEC. According to the IEC, all candidates have informed the IEC of their assets but the real verification never happened. According to a new Layeha, each candidate has introduced a financial representative to the IEC and opened a bank account which can be used for his/her campaign expenditures as well as for the rest of financial activities during the campaign.	(31 Dec. 2015) - The campaign funds, assets, and expenditures, including their sources has been registered in a symbolic way. The actual financial expenses of the candidates exceeded the legal threshold manifold. The verification of assets remains a big challenge and never took place.
106	Registered campaign funds, assets, and expenditures are verified, including the sources	106.1	IEC	IEC verifies campaign finances in cooperation with HOO, FINTRACA, AGO, Supreme Court, MOI (Major Crimes Task Force; Anti-Corruption Unit; and Interpol Afghanistan), NDS, Registration Department of Properties (municipalities), MAIL (Department of Properties), MOFA, MOJ (Department of Government Cases), MOF (Departments of Taxes; Salaries; Public Procurement; and Contracts), and AISA.	Candidates Assets & Resources	(15 Dec. 2013) - The sources of income and assets are not verified yet	(31 Dec. 2015) - The verification of assets remains a big challenge and never took place.
107	Effective oversight of political party financing	107.1	IEC	Long term oversight and audit program developed and implemented for the registration and verification of income, assets, and expenditures of political parties	Candidates Assets & Resources	(15 Dec. 2013) - The oversight and audit program has not been developed. The registration was enforced but the verification didn't happen.	(31 Dec. 2015) - Long term oversight and audit program for the registration and verification of income, assets, and expenditures of political parties has not been developed yet.
108	Campaign commitments to anti-corruption are met.	108.1	MEC	Elected candidates comply with the anti-corruption commitments made in their campaign platforms	Anti Corruption Commitment		(31 Dec. 2015) - The new administration is trying to enforce its anti-corruption commitments. The reopening of the Kabul Bank case based on PD3 and Resolution of the Council of Ministers dated 19.08.1393 about the implementation of MEC's recommendations, evaluation of the fuel contract of the MOD, prosecution of 6 MOUDA employees, reevaluation of AISA's legal status and incorporation of anti-corruption efforts in the 100 day plans of all ministries are some of the examples in this regard. However, releasing the former CEO, main debtor and shareholder of Kabulbank from jail and signing an illegal construction agreement with him in November 2015, raised serious concerns about the commitment of the unity government in fighting corruption.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
109	Structure of the Civil Service Commission reviewed and reformed to ensure transparency, accountability and effective management	109.1	IARCSC	IARCSC's mandate assessed to identify appropriateness of public servant appointment management	IARCSC Mandate	(15 Dec. 2013) - IARCSC reform plan under review by OAA.	(31 Dec. 2015) - IARCSC recognizes the need for review and reform of its mandate. According to the decision of the Cabinet, the appointment board of IARCSC has only an observing role in the appointment of Civil Servants, including high ranking positions (grades 1 and 2)
		109.2	IARCSC	Strategy for reform based on an assessment to enhance transparency by publishing meeting minutes and ensuring appointments are based on merit	IARCSC Mandate	(15 Dec. 2013) - IARCSC reform plan under review by OAA; unclear to what extent target met.	(31 Dec. 2015) - According to the decision of the Cabinet, the appointment board of IARCSC has only an observing role in the appointment of Civil Servants, including high ranking positions (grades 1 and 2)
110	Recruitment and appointment processes implemented based on merit, fairness and transparency	110.1	IARCSC	Audit prioritization includes appointment of diplomats, deputy governors, teachers, AGO staff, HOO staff, ACD staff, and all financial and procurement officials	HR-Policy IARCSC	(15 Dec. 2013) - Audits yet to be conducted, but irregularities apparent in all areas.	(31 Dec. 2015) - The appointment board of IARCSC is involved in the appointments of the civil servants of all government institution except MOFA and AGO but no audit has been conducted yet. MOFA and AGO do not obey the Civil Servants Law without any legitimate reasons and their employees are not appointed and paid in accordance with the Civil Servants Law and not under the Pay and Grading system of IARCSC
		110.2	IARCSC	The IARCSC clarifies that the recruitment process in the MOFA is not exempt from the Civil Service Law.	HR-Policy IARCSC	(30 May 2015) - Some MOFA officials involved in the hiring process claim that a Presidential Decree exempts the hiring process in the MoFA from the Civil Service Law.	(31 Dec. 2015) - Since the Civil Servants Law has been enacted, no government institution can be exempted from the Pay and Grading System, according to IARCSC. However, MOF is still using the former Civil Servants Law. Therefore, the GoIRA needs to clarify its position in this regard.
111	Civil servant misconduct assessed appropriately and available disciplinary measures put to use	111.1	IARCSC	IARCSC Complaints Board publishes and disseminates its decisions and reports on investigation results online	HR-Policy IARCSC		(31 Dec. 2015) - Complaints Board of IARCSC publishes its working reports on the commission's website. However, the decisions are not included in their reports. The complaints board officially communicates their decisions with the relevant institutions. According to IARCSC, the decisions of the Complaints Board are planned to be published in the future.
		111.2	IARCSC	All senior management must include implementation of IARCSC/Complaints Board orders in annual performance plans of staff	HR-Policy IARCSC		(31 Dec. 2015) - The senior management of the IARCSC and the director of the Complaints Board have repeatedly discussed this issue with the relevant Ministers/Directors. The implementation of this recommendation is the responsibility of the relevant institution. According to some of the ministries, the Complaint Boards orders are included in the annual performance plans of employees.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
112	Salary and benefits for civil servants appropriate and consistent	112.1	IARCSC	Strategy developed and implemented to provide employees sufficient salaries and benefits to sustain themselves	HR-Policy IARCSC	(15 Dec. 2013) - The MOF and IARCSC have developed a plan for the equalization of salaries for civil servants that has been approved by the cabinet and the MOF is planning to implement it soon. The ACD submitted a salary increase request for its staff to the President in 2012. It is unclear whether the reformed salaries are sufficient and if they are applied universally.	(31 Dec. 2015) - There is a procedure in place regulating extraordinary benefits of the civil servants, a guideline for CBR salaries and the National Technical Assistance (NTA) Remuneration Policy. However, there is no unified strategy in place. According to IARCSC, drafting such a strategy is not only the responsibility of IARCSC but MOF, MOEC and other relevant institutions have a responsibility in determining the civil servants salaries.
		112.2	IARCSC	Strategy ensures similar functions across the government receive similar salaries (taking into consideration level of education, work experience, skill sets, etc.) to reduce the percent of staff paid outside of government structures (i.e. non-tashkil staff)	HR-Policy IARCSC	(15 Dec. 2013) - The MOF and IARCSC have developed a plan for the equalization of salaries for civil servants that has been approved by the cabinet and the MOF is planning to implement it soon. The ACD submitted a salary increase request for its staff to the President in 2012. It is unclear whether the reformed salaries are comparable.	(31 Dec. 2015) - According to IARCSC, civil servants of the same grade and with the same functions receive the same salary and benefit. For example, a civil servant of grade 4 receive the same salary and benefit in all government institutions. Additionally, CBR, NTA and Super Scale salaries are some measures, that can increase the percentage of qualified staff within the government structure (i.e. non-tashkil staff). However, the discrepancy between the governmental and project salaries are remarkable which is a serious challenge.
113	Qualified commissioners appointed in IARCSC.	113.1	IARCSC	Review and amend the Administrative Reform and the Civil Service Law	Legal Framework IARCSC	(30 Oct. 2013) - The Civil Service Law is not sufficiently transparent and lacks a mechanism to ensure openness in the hiring process of the Commissioners.	(31 Dec. 2015) - The appointment of IARCSC Commissioners is based on the requirements of Article 8 of Civil Service Law. Additionally, some provisions of the Civil Service Law has been amended through the Presidential Legislative Decree # 82, dated 06. Sep. 2015. A copy of the Legislative Decree along with the amendments of the law has been shared with MEC.
114	Suspected and biased officials identified and introduced to relevant authorities	114.1	IARCSC	IARCSC identifies and takes legal actions against officials suspected of being biased and taking bribes in the appointment process	HR-Policy IARCSC	(30 Oct. 2013) - There is unjustified influence or interference in the appointment process by some of the ministries and high-ranking officials.	(31 Dec. 2015) - According to IARCSC, identification and taking actions against officials suspected of being biased and taking bribes is the responsibility of NDS and AOG.
115	Individuals who violate the legal provision of the recruitment process identified and handed over to the appropriate authorities.	115.1	IARCSC	IARCSC identifies individuals who violate the legal documents of the recruitment process and refers cases to the relevant authorities.	HR-Policy IARCSC	(30 Oct. 2013) - Although the legal framework of the process has penalties for violations they are not often implemented.	(31 Dec. 2015) - IARCSC has identified several violations in the appointment process through the General Directorate of Civil Services and referred them to the Special Representative of the President for Reform and Good Governance as well as to AOP. This is an ongoing process IARCSC has identified 87 violation in the recruitment process during the fiscal year 1394 which include: Recruitment without the required work experience, recruitment without the required academic degree, recruitment without the minimum score, and recruitment out of competitive process. The detailed list of the above violations have been shared with MEC.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
116	List of Commissioners whose service period extended more than once prepared and submitted it to the President of Afghanistan	116.1	IARCSC	The Chairman of the IARCSC should prepare a list of the Commissioners whose service period has been extended more than once and submit it to the President of Afghanistan to appoint new individuals.	HR-Policy IARCSC	(6 Mai 2014) - The lack of a limit on extensions of the Commissioners' service period is a corruption vulnerability.	(31 Dec. 2015) - According to IARCSC's report, the appointment and renewal of service period of the commissioners is not the responsibility of the appointment board because the Commissioners positions are political and out of grade. IARCSC sent the list of all 7 commissioners along with the proposal # 16, dated 29. May 2014 to the Presidential Office for extension or termination of their services approved in accordance with Article 5 (3). The former President has approved the extension period of their services through PD 2368, dated 25. June 2014.
117	Fair Civil Service staff development	117.1	IARCSC	IARCSC prepares and implements a mechanism to ensure fairness in the provision of scholarships and in-service training programs, especially overseas training opportunities.	HR-Policy IARCSC	(30 Oct. 2013) - The selection of participants for capacity-building programs seems to be based largely on personal relationships.	(31 Dec. 2015) - A commission comprising the MoFA, MOLSAMD, MOEc and MOHE has been established under the chairmanship of the General Director of the Civil Services Institute to distribute the scholarships and trainings based on the needs and contents of the programs to relevant institutions. However, illegal interference in the distribution of scholarships is still prevalent.
118	Priority government processes identified for simplification	118.1	IARCSC	Simplification of procedures prioritized for building permits, pensions, land distribution for repatriates, identity cards, driver's licenses, examination and graduation certificates, and addressing public complaints, particularly with regards to escalating complaints to the attention of a relevant minister	HR-Policy IARCSC	(15 Dec. 2013) - Steps for obtaining residential and commercial building permits as well as for the distribution of commercial land have been reduced, but implementation remains slow. The Pension Department of MOLSAMD has automated some procedures through a World Bank-funded project to reform the pension application and payment procedures. Distribution of land to returnees is hampered by bureaucracy and illegal interference, including bribery and land usurpation. 50 administrative procedures are set to be simplified in 2014, including those for obtaining a driver's license. Obtaining a graduation certificate from the MOHE has been simplified and should take two to three days, but in practice it takes much longer.	(31 Dec. 2015) - Some procedures are already simplified: E.g. the procedure of pension, driving license and certificate issuance are simplified. The Identity Card issue is delayed due to political concerns. Regarding public complaints, there are two simple and clear approaches: First the Complaint Box in every ministry and secondly, everyone can submit a written complaint directly to the Minister Office. Additionally, IARCSC has shared with MEC the summary of the simplification report of 1394. According to this report 9 procedures have been simplified in 3 institutions (Kabul Municipality, MUDA and MOPH) and implementation agreements have been signed with these institutions. Additionally, MOUs have been signed with the mentioned institutions for simplifying 9 other procedures.
119	Awareness of new administrative procedures raised among end users	119.1	IARCSC	Procedures for most important public services collected and published in book form (e.g. government directory), distributed freely and widely, and regularly updated	HR-Policy IARCSC	(15 Dec. 2013) - A government directory which covers all important public services does not exist in Afghanistan.	(31 Dec. 2015) - A guideline for simplified procedures will be made available to those ministries which have signed simplification agreements with the IARCSC. However, due to lack of budget and printing capacity, IARCSC cannot issue a Government Directory which contains important government services and make it freely available at the moment. Instate, IARCSC plans to publish the simplified procedures on its homepage.
120	Lunch hours must be strictly enforced. Any personal issues, including family emergencies, medical treatment, Fateha (Mourning) should be addressed through the use of legally entitled leave days or on weekends/holidays.	120.1	MOLSAMD	OAA sends a circular to all government institutions and in cooperation with IARCSC and MoHRA develops and implements a transparent mechanism in order to prevent misuse of official time	HR-Policy IARCSC	(15 Nov. 2014) - Public servants are regularly leaving their offices pretending to attend funeral ceremonies.	(31 Dec. 2015) - In order to prevent misuse of official hours and assure discipline, MOLSAMD has developed a Laila in 1393, called the Internal Discipline Guideline. The third chapter of this Laila is regulating official hours and chapter 5 is covering work discipline including attendance and absence of public employees. The mentioned Laila has been distributed to all government institution and shared with MEC.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
121	An effective electronic attendance system established and implemented for all civil servants.	121.1	IARCSC	All governmental institutions equipped with electronic attendance system	HR-Policy IARCSC		(31 Dec. 2015) - Electronic attendance system will be implemented for IARCSC employees when the Commission moves to its new building. All other governmental institutions are responsible for launching the electronic system themselves. Some ministries e.g. MOLSAWMD, MOJ, National Assembly, MAIL and some other institutions have already implemented the electronic attendance system.
122	Interference in the work of public bodies and officials explicitly prohibited through legislation	122.1	IARCSC	IARCSC and OAA develop legislation defining types of activities that are considered inappropriate interventions in public administrative processes	Legal Framework IARCSC	(15 Dec. 2013) - The OAA has drafted an order for the President that prohibits the illegal interference of all institutions and individuals, but the order was never signed due to the inclusion of articles 1(7), 1(9) and 1(15) in PD 45. However, interference continues to be rampant and is rarely punished.	(31 Dec. 2015) - According to IARCSC this is beyond their authority. However, MEC has prepared the draft Law on Lobbying which could prevent inappropriate interventions in public administrative processes if enacted.
123	Provincial Budgeting Policy developed	123.1	MOF	Provincial Budgeting Policy approved by the Council of Ministers	Budget	(19 Mar. 2014) - The policy has not been approved by the Council of Ministers yet	(31 Dec. 2015) - The Provincial Budgeting Policy was approved by the Council of Ministers on 13.07.1394 (05. Oct. 2015). A copy of the revised policy had been shared with MEC in advance.
124	Strengthened capacity of provincial development committees to actively participate in the budgeting process and oversight	124.1	MOF	MOF and IDLG deliver annual budgeting process trainings in the lead up to the budgeting process for the provincial partners identified in the Provincial Budgeting Policy	Budget	(15 Dec. 2013) - According to the MOF, they have continuously provided required trainings for provinces on the budgeting process and according to the Budget Directorate of the MOFA, the PDCs do have the capacity to fulfil their responsibilities in this regard.	(31 Dec. 2015) - The MOF has been conducting capacity building trainings in public financial management for all provincial entities since 1386. The training sessions are still on-going. Additionally, capacity building programs are currently under process, which includes i.a. modules on: general information on budgeting, role of the provinces in the budgeting process, general information on budget execution, M&E etc. Additionally, MOF has conducted 4 capacity building programs on budgeting in 1393 in Panjshir, Badakhshan, Sar-Pul and Jozjan provinces which has been supported and coordinated by IDLG / ASGP.
125	A fair and transparent mechanism to distribute benefits set and approved by MOHE.	125.1	MOHE	Authorities in the universities set a fair and transparent mechanism to distribute benefits and approve it by MOHE.	HR-Policy MOHE	(30 Sep. 2013) The academic staff enjoy the whole benefits and there is less chance of promotion in administrative sections in the universities.	(31 Dec. 2015) - Academic and administrative positions are separated and each position is either academic or administrative with the related salary and benefits. According to Article 35 of the Higher Education Law, salaries of the academic cadres should be regulated in a separated regulation. Administrative positions' salaries on the other hand, are regulated in based on Article 70 of this Law in accordance with the Labour Law and the Civil Servants Law
126	A policy developed and implemented to mitigate unfair influences..	126.1	MOHE	MOHE in coordination with universities, develops and implements a policy to mitigate unfair influences and pressure and prevent illegal access	Illegal MOHE Interference	(30 Sep. 2014) - Using unfair influence is an issue that is mostly practiced by ministry authorities, Members of Parliament, and other government organizations.	(31 Dec. 2015) - According to MOHE, procedures and TORs are being implemented to avoid unfair influence. However, MEC's findings show that illegal interference in the Konkori exam, allocation of scholarships and hiring process of the Ministry are still prevalent.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
127	Clear document management procedures developed and implemented	127.1	MOHE	MOHE in cooperation with universities (Student Affairs Departments) develops procedure for MOHE and the universities to have access to the document management system	IT MOHE	(30 Sep. 2013) - Accessibility to documents and information is difficult and there is no consolidated mechanism available to the applicants.	(31 Dec. 2015) - Accessibility to the document management system is still a challenge. However MOHE is planning to computerize the archive system which will solve some of the problems.
128	Comprehensive document management database accessible by relevant authorities	128.1	MOHE	MOHE in cooperation with universities create a new computerized system in archive and implement it.	IT MOHE	(30 Sep. 2013) - In general there are two threats facing documents: first is the possibility of catching fire, and second – which is most threatening - is the destruction or deterioration because of moisture.	(31 Dec. 2015) - According to the IT Department of MOHE, a plan for computerizing the archive has been drafted and sent to the Minister for his approval. MOHE did not share a copy of the draft plan with MEC. Nonetheless, the IT department usually receives the official letters electronically from universities and higher education institutions in the provinces and archive the hard- and soft copies.
129	A computerized document management system developed	129.1	MOHE	MOHE guidelines incorporate the whole process of receiving diplomas	IT MOHE		(31 Dec. 2015) - A procedure for receiving diploma has been published in the collection of Regulations, Laha and Procedures of the MOHE which is also available on the website of the ministry. Additionally, MEC Secretariat has received a copy of the guideline, which covers the process from filling the application form to receiving the diploma
130	Guideline developed, published and accessible to public via websites.	130.1	MOHE	Expansion of access to guidelines to allow all universities and public to MOHE websites	IT MOHE		(31 Dec. 2015) - MOHE has published a collection of 5 Regulations, 12 Laha, 6 Procedures and 2 Guidelines in circulated the hart copy to all universities and academic institutions. This collection is also available on the MOHE homepage. www.mohe.gov.af
131	Development of Higher Education Law with participation from relevant government and civil society stakeholders and universities	131.1	MOHE	MOHE in consultation with MOFA, MOJ, MOE, representatives of government and private universities and civil society draft the Higher Education Law	Legal Framework	(30 Sep. 2013) - The Higher Education Law has not been approved by the Parliament on the pretext of title selection such as Pohantoon and Danishghah, Pohanyar and Danishyar.	(31 Dec. 2015) - The new Higher Education Law has been enacted on October 31 2015 and published in the Official Gazette Nr. 1195.
132	Higher Education Law approved	132.1	MOHE	Parliament gives priority to the approval and finalization of the Higher Education Law	Legal Framework		(31 Dec. 2015) - The new Higher Education Law has been enacted on October 31 2015 and published in the Official Gazette Nr. 1195.
133	Set up a unified standard curriculum for all academic institutions.	133.1	MOHE	The Ministry of Higher Education in consultation with the universities set up a unified, market based standard curriculum for all academic institutions and introduces a unified credit system.	Credit-Point System	(30 Sep. 2013) - There is a variety of classic and credit point based systems at the country's universities.	(31 Dec. 2015) - Public universities and higher education institutions are already using the Credit System. Also, all private universities apply the Credit System. MEC Secretariat has visited the Medical Faculty of the Kabul University and the Afghanistan Higher Education Institution which have already introduced the credit point system. Additionally, a unified curriculum has been prepared by MOHE and sent to all universities for implementation.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
134	A thorough assessment of universities' organizational needs conducted.	134.1	MOHE	MOHE conducts an assessment of universities' organizational needs for the implementation of the credit system.	Credit-Point System	(30 Sep. 2013) - Organizational structure deficiencies and the lack of teachers in universities (particularly in those that use the credit system) has obliged professors to teach extra hours as well as instruct courses not in their field of expertise.	(31 Dec. 2015) - The organisational structure of the universities is based on the needs and the legal documents. Universities conduct an assessment of their organisational structure annually and submit their proposals for filling the structural gaps to MOHE. Subsequently, the ministry analyses the proposals and take appropriate measures. Besides, the Credit System has been introduced based on the unified curriculum in all universities and higher education institutions. To assure quality and credibility of the structures of universities and higher education institutions, 2 legal documents are applicable: Quality Assurance Laiha and Procedure for Evaluation of Academic, Administrative and Structural Standards of Universities and Higher Education Institutions.
135	Consolidate present legal documents related to the exam process.	135.1	MOHE	The Ministry of Higher Education in consultation with the universities consolidates the present legal documents pertaining to the exams process.	Legal Framework MOHE	(30 Sep. 2013) - The existence of several documents causes ambiguities, which allow officials and teachers to escape their responsibilities.	(31 Dec. 2015) - The legal documents of the exam process include the new Higher Education Law, Procedure of the Entrance Examination for higher and semi-higher Education Institution, Examination Procedure of higher Education Institution, Procedure of Enrollment of Technical and Vocational Schools Graduates at Universities which are applicable. The above mentioned legal documents have been shared with MEC and are available on the ministry's homepage.
136	Monitor implementation of the legal frame work.	136.1	MOHE	The Ministry of Higher Education in consultation with the universities seriously monitors the implementation of the legal framework and universities take measures to identify those who violate the legal provisions and make sure they are appropriately punished.	Legal Framework MOHE	(30 Sep. 2013) - The lack of monitoring process by the designated authorities allows teachers to think that the legal documents need not be implemented.	(31 Dec. 2015) - According to MOHE, monitoring the compliance with laws, regulations and Laihas is conducted by the Internal audit department, Directorate of Quality Assurance and Directorate of Academic Coordination Affairs. No monitoring or audit report has been shared with MEC.
137	Hiring conditions for lecturers in universities revised.	137.1	MOHE	MOHE revises the hiring conditions of lecturers in universities.	HR-Policy MOHE	(30 Sep. 2013) - The current hiring procedure does not encourage those with a higher educational degree (Master or PhD) to start an academic carrier as a lecturer.	(31 Dec. 2015) - MOHE has revised the hiring conditions of universities lecturers. Chapter 4 of the new Higher Education Law regulates the hiring conditions of university lecturers in Articles 34 - 51. The recruitment and approval of universities lecturers are particularly stipulated in Articles 37, 38 and 39 of the new Law.
138	Mandatory computer training for teachers provided.	138.1	MOHE	Universities provide computer training for the teachers to digitalize the relevant information in order to improve the filing and information management system	HR-Policy MOHE	(30 Sep. 2013) - One of the major deficiencies of the current document and information management system is teachers' frustration with the need to use computer technology.	(31 Dec. 2015) - According to MOHE, computer and English language training sessions have been provided in a lot of universities. However, participating in these trainings are voluntary but recommended to all lecturers.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
139	The monitoring policy considering harassment and discrimination cases strengthened and maintained.	139.1	MOHE	MOHE strengthens the monitoring policy considering harassment and discrimination cases.	Universities & Harassment	(30 Sep. 2013) - Some teachers misuse the exams as a tool to achieve their own agenda, misusing exams for immoral issues or tribal, language, political and religious prejudices	(31 Dec. 2015) - MOHE has developed and published an harassment prevention policy called "Policy on Prohibition of Discrimination and Sexual Harassment" which is being distributed to all Universities for implementation. A copy of the policy has been shared with MEC. Additionally, the gender department of the MOHE is established for conducting awareness workshops and seminars in order to reduce harassment of girls. Gender units have been established at 18 universities and 25 academic institutions which is expanding.
140	Suspects referred to the proper authorities.	140.1	MOHE	MOHE refers substantiated allegations to investigative entities.	Discrimination & Harassment		(31 Dec. 2015) - According to the gender department of MOHE, no complaints with criminal implication has been referred to them so far. Only one case of discrimination has been dealt with, in which a male applicant of comparatively minor qualification was preferred for a teacher's job at Al Berooni university. After the intervention of the gender department, the job was given to the eligible female applicant.
141	The process of implementing legal documents actively monitored by using different information sources.	141.1	MOHE	Universities and higher education institutes should, in coordination with MOHE, design a mechanism in a fixed time and incorporate the comments of students and teachers' associations.	Universities		(31 Dec. 2015) - According to MOHE, monitoring the compliance with laws, regulations and Laihias is conducted by the internal audit department, Directorate of Quality Assurance and Directorate of Academic Coordination Affairs. No monitoring or audit report has been shared with MEC.
142	A complaints committee comprised of trustworthy people established.	142.1	MOHE	The universities set up complaints committees comprised of trustworthy people including one representative of students.	Universities	(30 Sep. 2013) - The Students' Complaints Committee has not always been impartial and favours the teachers which gives rise to the disappointment of students and impedes justice.	(31 Dec. 2015) - There is no permanent complaints committee with students membership in place. However, there is the Order and Discipline Committee which deals with the complaints of students, teachers and admin staff.
143	Qualified and accountable individuals recruited for archiving students' documents and exam grades	143.1	MOHE	Universities make sure that qualified and accountable people are recruited for the archiving of students' documents and grades in the exams section.	Universities	(30 Sep. 2013) - The falsification of documents and information related to the exams process is easily possible in the Faculty Academic Management Unit and thus represents a vulnerability to corruption.	(31 Dec. 2015) - According to the MOHE all positions are filled with qualified and accountable applicants based on the TOR through a competitive process which also include representatives of the IARCSC and the relevant Department. Additionally, new recruits have to sign a declaration of agreement to respect the confidentiality of classified documents. All universities have a students affairs manager and all faculties have an Educational Department (Tadrissi), who are responsible for archiving the documents and exam scores. The TOR of mentioned positions are shared with MEC.
144	Individual access to the documents and information limited	144.1	MOHE	Universities should deny individual access to documents and information.	Universities	(30 Sep. 2013) - The falsification of documents and information related to the exams process is easily possible in the Faculty Academic Management Unit and thus represents a vulnerability to corruption.	(31 Dec. 2015) - All universities have a Department of Students affairs and each faculty has an Educational Department. Only these departments have access to the documents. Additionally, new appointees must submit their written commitment regarding the confidentiality of their work. According to their TOR, monitoring and controlling the enrollment and graduation documents and the insertion of exam scores are part of their jobs.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
145	Infrastructure project of refugee's residential town implemented	145.1	MORR	Ministries and entities mentioned in Presidential Decree 104 assess and identify the factors causing delays in the implementation of infrastructure and development projects in refugees' residential towns	Land Distribution Process	(30 Oct. 2013) - The MORR, as the main body for decree implementation, has not developed any procedure that could explicitly apply provisions of the decree.	(31 Dec. 2015) - The MORR has signed MOUs with 13 relevant ministries and institutions regarding the implementation of infrastructure projects. In this regards some achievements have been made: for example, in the Khalilullah Khalili residential town in Kabul 3 Schools have been built by MOE, 2 hospitals by MOHE and 3 mosques by MOHRA. In the Galamwal residential town in Khost, a girls school has been built by MOE and 20 Wells by MRRD. Additionally, a joint technical committee was established with the participation of MAIL, MUDA, IDLG, ARAZI, as well as the Senior Advisor of the President. The committee has appointed a delegation consisting of the provincial directors of ARAZI, MORR and MUDA on 16th of July 2015 to analyze the refugee's residential towns and report to the committee. The Analysis has been conducted in Kabul, Parwan, Panjshir, Farah, Wardak, Sar e Pul, Laghman and Nangrahar provinces and is in progress in other provinces as well. According to their findings of the delegation, the major problems causing the delay in the infrastructure projects of refugee's residential towns are: lack of security, lack of groundwater storage, long distances of the residential towns to the cities, lack of sufficient development budget and usurpation of land by powerful people.
146	The process of land distribution simplified and changed to a one stop shop	146.1	MORR	MORR simplifies the land distribution process, changes the system to a one stop shop, and develops mechanism to prevent high officials' interference in the process.	Land Distribution Process	(30 Oct. 2013) - The working procedure of the land distribution process is long, bureaucratic and complicated and contains 63 steps resulting in confusion of the applicants of the land distribution process.	(31 Dec. 2015) - The land distribution process has been simplified by the HOO. The legal committee of the Ministry has incorporated all relevant documents in its recently developed land distribution procedure which has been shared with MEC. MORR recently started the establishment of a One-Stop Shop at the ministry. In addition, the ministry instructed its provincial offices via letter # 3050 dated 9 Dec 2015 to establish One-Stop. The mentioned letter has been shared with MEC's Secretariat. If the new procedure and PD 104 are implemented honestly by the land distribution committee, there would be no room for interference.
147	The process of land distribution for repatriates and displaced started and fairly distributed	147.1	MORR	MORR distributes land for repatriates and displaced in accordance with their policy	Land Distribution Process	(30 Oct. 2013) - To date, the Ministry has distributed more than 54,782 pieces of shelter within 62 residential towns throughout the country.	(31 Dec. 2015) - After the approval of the Procedure for Land Distribution on 19th of May 2015, 1534 plots has been distributed to returnees and repatriates in Parwan, Bamyan, Daikundi, Jozjan, Logar and Bankh provinces. Some documents of the distributed plots have been shared with MEC.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
148	Effective investigation and prosecution of 3,500 shelters distribution initiated.	148.1	MORR/AGO	Attorney General's Office and Supreme Audit Office jointly investigate the distribution of 3,500 shelters in refugees' housing schemes in Kabul and provinces.	Land Distribution Process	(30 Oct. 2013) - At least 3,500 shelters in refugees' housing schemes have been distributed to more than one deserving applicant in Kabul province, which has caused conflicts among recipients.	(31 Dec. 2015) - MORR has referred cases of delinquency and cases with criminal implications to the AGO, including the land distribution case in Kabul province, and shared the related documents with MEC. For example, the former deputy minister, the director of refugees affairs of Kabul province, the head of admin and finance unit and the manager of reintegration unit of Kabul province have been referred to AGO and are currently under investigation. Additionally, MORR's legal committee has taken some measures to deal with the issue of 3,500 shelters. As a result, the Ministry has addressed the complaints and distributed 800 plots to eligible applicants. Further, the MORR is planning to solve the problems of 2,700 applicants in 1394 by allocating them pieces of residential land in GOSPAN DARA of Kabul.
149	Recruitment and appointment processes implemented based on merit and qualifications	149.1	MORR	MORR in coordination with IARCSC recruit qualified staff in vacant positions, and identify unqualified, uncommitted and corrupt officials through annual performance appraisal	HR-Policy MORR	(30 Oct. 2013) - Lack of professional, talented, honest, committed and capable employees is making the process of land distribution vulnerable to corruption. There are still positions that are vacant and some staff members are working temporarily.	(31 Dec. 2015) - In the first three quarters of 1393, 100 vacant positions (50 in Kabul and 50 in provinces) were filled through fair competitions. The ministry filled 9 vacant positions with the support of IARCSC through a competitive process and announced 20 more in the second half of the solar year 1394. Eight positions of grade 2 and 3 are currently under process through the CBRF and 12 positions have been filled in the provincial Directorates of the Ministry through a competitive process. Additionally, a performance review of 57 employees have been conducted which resulted in the promotion of 15 employees and training requirements for one employee of grade three. The related documents have been shared with MEC Secretariat.
150	Annual performance appraisal to identify unqualified, uncommitted and corrupt officials conducted	150.1	MORR	MORR implements staffing procedures and observes recruitment principles	HR-Policy MORR	(30 Oct. 2013) - There is unprofessional behavior of high-ranking employees with low-ranking staff members, the misuse of job descriptions, and transfers and unjustifiable appointments at the Ministry.	(31 Dec. 2015) - The recruitment and annual performance evaluation of all employees have been conducted in accordance with IARCSC guidelines. Performance review of 57 employees have been conducted recently which resulted in the promotion of 15 employees and training requirements for one employee of grade three. The related documents have been shared with MEC Secretariat.
151	Establishment of daily electronic reporting mechanism.	151.1	MORR	The MORR establishes a daily electronic reporting mechanism in the document and information management system	IT MORR	(30 Oct. 2013) - The employees involved in the process are not using the database system properly and still keep documents in a disorganized manner. This has resulted in clients losing documents.	(31 Dec. 2015) - Currently, all provincial directorates have access to internet and submit their reports through email on a daily basis. Additionally, a central database has been established, which is not connected to the provincial directorates yet. Copies of some of daily report has been shared with MEC's Secretariat.
152	Limit access of employees to database	152.1	MORR	MORR limits the access of employees to the database	IT MORR	(30 Oct. 2013) - Document and information management system is maintained in an old and classic way and there are no mechanisms or guidelines for accessing the documents.	(31 Dec. 2015) - MORR has currently a basic level database which is operated by one employee and not connected to the provincial directorates. The central database of MORR is planned to be completed with the support of IOM and connected to 4 provinces (Kandahar, Nainroz, Herat and Nangrahar) by end of 1394. Employees of the IT and Research departments have received trainings in data entry.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
153	Comprehensive legal framework designed	153.1	MORR	The MORR designs a comprehensive legal framework regarding duties and responsibilities of MORR and develops comprehensive procedure covering all areas of work related to land distribution.	Legal Framework MORR	(30 Oct. 2013) MORR as the main organ for the implementation of Presidential Decree 104 has not developed any procedure that could explicitly apply provisions of the decree. This issue has resulted in a variety of interpretations of the decree, delays in its application, as well as continued corruption and injustice within the land distribution process.	(31 Dec. 2015) - A comprehensive Regulation called "Regulation on the Activities and Operations of MORR" which was covered in the first 100-day plan of the Ministry, has been finalized. Additionally, the procedure for land distribution has been developed and approved. MEC Secretariat has received a copy of the procedure and regulations.
154	Multilateral agreements developed and signed	154.1	MORR	MORR develops and signs multilateral agreements with involved entities mentioned in Presidential Decree 104 to ensure the coordination of all efforts related to the affairs of the refugees' housing schemes.	Legal Framework MORR	(30 Oct. 2013) - Lack of coordination among ministries and responsible organs mentioned in Presidential Decree 104 causes delayed implementation of infrastructure and development projects in refugee housing schemes and land distribution to eligible applicants.	(31 Dec. 2015) - The High Commission of Refugees and Repatriates Affairs is established under the chairmanship of the President and with participation of 19 Ministries and General Directorates. The TORs of the Commission have also been developed and the first session has been conducted on 21 June 2015 under the chairmanship of the President. Additionally, a technical committee has been established under the chairmanship of MORR with the participation of MAIL, MUDA, ARAZI, MRRD, IDLG and Board of the New Kabul City to provide affordable housing with long term mortgage loans and pave the way for the settlement of returnees in New Kabul City and suburbs.
155	MoLSAMD coordinates with SAO to identify fake retirement cards	155.1	MoLSAMD	MoLSAMD, in coordination with SAO, examines current retirement cards to identify ghost pensioners and take legal action against illegal beneficiaries.	MoLSAMD Investigation	(10 Dec. 2014) - There are thousands of fake retirement cards, from which brokers and staff are illegally receiving pension payments.	(31 Dec. 2015) - According to MoLSAMD's report, circulars have been sent to the provincial directorates of the Ministry to evaluate the M40 Files of pensioners, disabled and martyrs in order to identify ghost pensioners or those who receive more retirement pay than they are legally eligible. Additionally, delegations have been sent to the provinces to oversee the process. The evaluation has been completed in all 34 Provinces. According to the General Directorate of Pensioners, approximately 1 billion AfIs has been saved as a result of the following reform measures: evaluation and reform of the M 40 files, prevention of illegal interference of the "Brokers" (Kameshankaran), simplification of the application process, registration of pensioners in the new computer system, processing and payment through the banking system, verification of the pensioner's documents through involved institutions, payment of the pensioner's benefits only to the retiree or eligible inheritors and the establishment of the Documents Evaluation Commission for the payment of the pension as a lump sum.
156	The database in Pension Department completed and implemented	156.1	MOI	MOI establishes a functional computerized database in the Pension Department for entering and processing all police retirement issues	MOI Pension	(30 May 2014) - A computerized database exists at the MOI but it is not used. The MOI Pension Department is not connected to MoLSAMD. It sends the retiree list in hand written form to MoLSAMD.	(31 Dec. 2015) - All information related to the retirees of the National Police are entered into the new database and the documents of the National Police are processed through the new system. The GDPA does not have a separate database for the Police. However, the MOI is not connected online with the GDPA.

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157	Redundant or parallel structures reduced to minimize discretionary transactions and improved redress mechanisms.	157.1	MOLSAMD	MOLSAMD, in coordination with AIRCSC, establishes a joint complaints board to ensure that all clients have a reliable redress mechanism and dissolves the Fact Finding Commission	MOLSAMD Complaint Mechanism	(30 May 2015) - Fact Finding Commission is redundant and compels disabled persons in provinces to come to Kabul. Currently no complaints board exists	(31 Dec. 2015) - The new leadership of MOLSAMD has dissolved the Fact Finding Commission and established the Documents Evaluation Commission with the membership of NDS, Criminal Department of MOI as well as the Representative of MOPH, the Disabled Union and Civil Society. The same commission has been established in provinces as well. The minutes of a session of the mentioned commission has been shared with MEC, which covers the TOR of the commission and the process of verification of martyr families and the degree of disability of disabled persons.
158	New criteria for disability determinations need to be developed and made publicly available.	158.1	MOLSAMD	The new criteria for disability determination should be detailed, comprehensive, and made publicly available to all applicants. Detailed disability examination forms should be mandatory and require signature of both the examiner and examinee.	Disability Criteria	(30 May 2015) - Current degree of disability determinations are based on vague criteria that aren't publicly available	(31 Dec. 2015) - MOLSAMD has established a commission to develop new criteria for disability determination. The commission is currently drafting a regulation for the determination of the degree of disability and had 3 working sessions so far. Based on the MOLSAMD's report, the mentioned regulation is included in the 3rd 100-day plan and will be finalized in one month.
159	One stop shop established at MOLSAMD provincial offices.	159.1	MOLSAMD	All application requirements, including security incident verifications and disability determinations made/arranged at a single source. One stop shops have biometric capacity. All information including security verifications, disability determinations, biometrics, etc., are entered into a database, which MUST be linked to the national database in Kabul.	MOLSAMD One Stop Shop	(30 May 2015) - Current process consists of unnecessarily duplicative steps, which requires signatures from numerous entities that are not co-located. No biometric capacity currently exists in MOLSAMD provincial departments. Databases exist at the provincial level but they are not linked in any meaningful way with the national database.	(31 Dec. 2015) - MOLSAMD has officially requested the World Bank to provide support in the establishment of a biometric system and in the establishment of a database in Kabul and MOLSAMD's directorates in the provinces. According to the agreement between MOLSAMD and WB, work on the biometric system and the central database will start in July 2016.
160	Law on the Basic Structure of the State approved and enforced	160.1	IARSC/AOP	National Assembly approves the Law on the Basic Structure of the State, President endorses it and MOJ promulgates it.	Legal Framework IARSC		(31 Dec. 2015) - The Draft Law on the Basic Structure of the State was reviewed by MOJ and submitted to AOP. Meanwhile, General Directorate of Legal, Justice and Judicial Affairs of the AOP had reviewed the law and submitted to President of Afghanistan. According to the General Directorate of Legal, Justice and Judicial Affairs of AOP, further process of Law on the Basic Structures of State, depends on amendment of the Constitution. According to the political agreement, the constitution is subject to amendments within completion of the 2 years of the National Unity Government.
161	Administrative Procedures Law developed with participation from the relevant government and civil society stakeholders	161.1	IARSC	Enact the Administrative and Performance Law with the cooperation of relevant stakeholders, including the IARSC, OAA, MOJ, MOLSAMD, IDLG, MOF, AGO, courts, municipalities, and civil society	Legal Framework IARSC	(30 Oct. 2013) - There is no Administrative Procedure Law in place.	(31 Dec. 2015) - The legislative and policy units of the IARSC has prepared and sent the Draft Administrative Procedure Law to MOJ for scrutiny and further process.

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162	The legal documents of the recruitment process aligned with the Constitution and Basic Structure Law	162.1	IARCSC	IARCSC in coordination with the Ministry of Labour and Ministry of Justice aligns the legal documents of the process with the Constitution and Basic Structure Law in such a way that the shortcomings are eliminated	Legal Framework IARCSC		(31 Dec. 2015) - The recruitment process of the civil servants is in accordance with The Civil Service Law and the Civil Servants Law. Both laws have been enacted in light of Article 50 of the Constitution. Additionally, the Procedure for the Recruitment of Civil Servants and its Monitoring has been prepared and approved based on the Civil Servants Law. A copy of the mentioned procedure has been shared with MEC
163	Self assessment conducted to identify causes of employees' dissatisfaction.	163.1	IARCSC	IARCSC launches a self assessment to identify causes of employees' dissatisfaction and bring positive changes in the workplace	HR-Policy IARCSC	(30 Oct. 2013) - Many employees are not happy with their working environment because they believe that their views are not respected by managers and that super-scale salaries are not merit-based	(31 Dec. 2015) - IARCSC has conducted a self assessment program with regards to the job satisfaction of this commission's employees in August 2014 which includes: salary and other benefits persuasion, satisfaction of the job, welfare and job security, mutual respect, job awareness, education pursuing possibility, satisfaction of the behavior of line managers, commitment to the job and impunity from violence, discrimination and unnecessary limitations. A copy of the mentioned Self Assessment has been shared with MEC. According to IARCSC, CSC will take the necessary steps forward for creating a better working environment
164	Separate pharmaceutical procurement procedures based on required criteria developed and implemented for procurement of quality pharmaceuticals	164.1	MOPH	Establishment of separate pharmaceutical procurement procedures that have better delineated criteria for selection and promote quality.	Legal Framework MOPH	(22 Sep. 2014) - The Procurement law is too broad in relation to the procurement of pharmaceuticals. This paves the way for bribery and abuse of power by prosecutors and auditors in the procurement process. The MOPH is currently working on a new procedure.	(31 Dec. 2015) - A Guideline for Procurement of basic Pharmaceuticals has been drafted in cooperation with relevant stakeholders (different Departments of the Ministry, Pharmaceutical Faculty of the Kabul University as well as NGOs e.g. CAF, AKHS, ADDA, HEFD and Save the Children) which is technically finalized and under terminological review. According to GDPA, the mentioned guideline will be distributed to the relevant institution and published on the Directorate's homepage, after the approval of the Minister.
165	The Pharmaceutical Law is reformed and enforced to address conflict of interests in pharmaceutical business	165.1	MOPH	Pharmaceutical Law reformed to adequately regulate the increased volume and diversity of pharmaceuticals entering the country and prohibit government staff from having business interests in pharmaceutical companies.	Legal Framework MOPH	(22 Sep. 2014) - The MOPH is working on amending the law.	(31 Dec. 2015) - The amendment of the Law was sent to the MOJ for further process. However, the new minister has withdrawn the law for further enrichment. Article 4 deals with the establishment of a National Board for Pharmaceuticals and Food. In Paragraphs 9 & 10 of this Article the issues of conflict of interests of the board member is addressed. Additionally, the Good Governance for Medicine Program has been launched with the cooperation of WHO in 2012 which covers the issue of conflict of interest on an individual and institutional level as well as the prevention of conflict of interest. A Copy of the mentioned programme has been shared with MEC.

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166	Reform the organizational structure of the involved Pharmaceutical Affairs Directorates to ensure that human resources are allocated to provide better pharmaceutical services and monitor the process of pharmaceutical importation	166.1	MOPH	The organizational structure of the Pharmaceutical Affairs Directorate reviewed and reformed to ensure that human resources are allocated to improve surveillance/oversight capacity	MOPH Structure	(22. Sep. 2014) - The organizational structure is not conducive to addressing the challenges and scope of pharmaceutical import issues, resulting in poor performance/oversight. The Ministry is unable to control the volume/quality of imports or formulate and implement plans/strategies conducive to improving quality control.	(31 Dec. 2015) - Based on WHO guidelines, MOPH has prepared and finalized a reform proposal regarding the separation of regulatory and pharmaceutical services. The proposal has been sent to the Presidential Office, which has not been approved yet. According to the mentioned proposal, fundamental changes are planned in the organisational structure of pharmaceutical affairs. Based on this proposal the GDPA will be replaced with the "National Medicine and Health Products Regulatory Authority" and the "General Directorate of Pharmaceutical Services" will be established as a new Directorate within MOPH. A copy of the mentioned proposal has been shared with MEC.
167	The roles and responsibilities of pharmaceutical related entities/ directorates are clarified and overlap between departments is prevented	167.1	MOPH	Roles and responsibilities of the entities/departments involved in pharmaceutical affairs are clearly defined through TORs and their activities reviewed and reformed.	MOPH Structure	(22. Sep. 2014) - Overlaps between the responsibilities of involved entities/departments and poor inter-departmental coordination paves the way for unnecessary delays, lack of responsiveness and abuse of power by officials.	(31 Dec. 2015) - Based on WHO guidelines, MOPH has prepared and finalized a reform proposal regarding the separation of regulatory and pharmaceutical services. The proposal has been sent to the Presidential Office, which has not been approved yet. Therefore, the TOR of the pharmaceutical related departments will be developed after the approval of the mentioned proposal and the new Pharmaceutical Law, which is currently under amendment.
		167.2	MOPH	Formal coordination mechanism among departments established and implemented to provide better services and effective monitoring.	MOPH Structure		(31 Dec. 2015) - The National Board for Food and Pharmaceuticals is currently responsible for coordination, monitoring and advisory of the pharmaceutical sector. After the establishment of the National Medicine and Health Products Regulatory Authority, as proposed by the GDPA and supported by WHO, all pharmaceutical affairs will be managed and coordinated by this authority.

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168	The number of qualified staff with pharmaceutical backgrounds in the process of importation, pharmaceutical services and monitoring increased.	168.1	MOPH	Salary and benefits of pharmacists determined based on their professional level and opportunities for promotion provided.	HR-Policy MOPH	(22 Sep. 2014) - Lack of qualified staff, lack of transparency in the recruitment process, low salaries as well as the fact that pharmacists are not accepted as cadres result in low productivity as well as the intervention and manipulation in the recruitment process and the use of bribes and illicit payments through pharmaceutical importing companies.	(31 Dec. 2015) - According to GDPA, the merit based salary and benefits and the promotion opportunities for pharmacists will depend on the approval of the organizational structure reform proposal by the relevant authorities. After the establishment of the "National Medicine and Health Products Regulatory Authority" and the "General Directorate of Pharmaceutical Services", measures will be taken to support key positions through CBR. Additionally, based on the new Draft Pharmaceutical Law, a risk premium will be provided for pharmacists, according to GDPA.
		168.2	MOPH	Transparent and merit-based recruitment mechanism established and implemented.	HR-Policy MOPH		(31 Dec. 2015) - According to GDPA, the recruitment process is merit based and the MOPH in cooperation with the Civil Service Commission is responsible for the process.
		168.3	MOPH	The Food and Drugs Quality Control (FDQC) Department equipped with required technical resources.	Capacity and Resources MOPH	(22 Sep. 2014) - The FDQC Department, the Department is partially equipped with the necessary technical resources but is struggling with shortages of the required materials for dissecting and analysis of food and drugs. These shortages are planned to be addressed in cooperation with the World Bank Health Project and financial resources of the Ministry.	(31 Dec. 2015) - The FDQC Department has conducted a needs assessment of its technical resources and shared their findings and a list of the needed equipment with the WHO to address the identified gaps two years ago for their support. The mentioned list has been seen by MEC Secretariat which includes 114 different kind of equipment, 130 reagent and 80 glass items. Additionally, GDPA has included the issue of strengthening the quality and quantity of the FDQC in a proposal submitted to the System Enhancement for Health Actions (SEHAT) program supported by the World Bank. The Proposal has been approved and establishment of a new building and its equipment with new testing machinery is currently ongoing and will be completed in the next 3 months. The mentioned proposal has been shared with MEC. Further, according to the reform proposal regarding the separation of regulatory and pharmaceutical services, the FDQC will keep working under the umbrella of the "General Directorate of Pharmaceutical Services"

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
169	The registration and licensing of pharmaceutical importation companies reformed	169.1	MOPH	License issuance/renewal based on annual monitoring and evaluation of importing companies.	Company Registration/License		(31 Dec. 2015) - Renewal of license for importing companies is regulated in Article 15 (7) of the draft Pharmaceuticals Law which has been sent to MOJ for further process. According to Article 15 (9) of the Draft Law, the National Pharmaceutical Regulating Authority is authorised to suspend or terminate a license based on public interest, provision of this Law or relevant regulations. According to GDPA renewal of company licenses is enshrined in a separate chapter called "License Registration" in the new Draft Pharmaceutical Law. The implementation of this will depend on the enactment of the mentioned law. MOPH has not shared the Draft Law with MEC. According to the 6-monthly report of MOPH published on Oct. 19th 2015, of the 1000 pharmaceutical importation companies that has been evaluated, only 200 of them have been considered credible.
		169.2	MOPH	Specific mechanism to prevent companies interference in licensing process developed and implemented.	Company Registration/License		(31 Dec. 2015) - According to Article 15 (5) of the Draft Pharmaceutical Law, license for importing or producing of pharmaceuticals is issued by the National Pharmaceutical Regulating Authority after the approval of the relevant technical committee. Technical committees are established in accordance with Article 4 (3) of the draft Law by the National Board for Pharmaceuticals and Food which are assigned with specific tasks. According to MOPH, the decision on providing a license will be taken by an appointed committee, which also includes non-MOPH members after a comprehensive evaluation of the company's documents. This mechanism can prevent undue interference to some extent. TOR and Administrative Guideline of the committee have been shared with MEC.
170	The Registration system of foreign pharmaceutical production companies reformed and standardized in order to enhance quality of imported pharmaceutical	170.1	MOPH	Specific and transparent criteria established for approval/denial of licenses for producing pharmaceuticals based on a specified policy	Company Registration/License		(31 Dec. 2015) - The new Registration Guideline for Foreign Pharmaceutical Production Companies has been prepared and finalized and is available on the GDPA homepage. This guideline contains specific criteria for approval, denial and suspension of licenses. E.g. the license can be abrogated if the registered foreign company doesn't import any of the listed pharmaceuticals for 3 consecutive years or the foreign company produces at least 3 different medical products of low quality or the company does not comply with the GOOD MANUFACTURING PRACTICES FOR PHARMACEUTICAL PRODUCTS developed by the GDPA based on the WHO best practice.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
171	A specific sampling procedure and quality testing of pharmaceuticals developed	171.1	MOPH	A specific mandatory sampling procedure for pharmaceuticals established	Medicine Quality Control	(22. Sep. 2014) - Unprofessional sampling creates opportunity for manipulation.	(31 Dec. 2015) - MOPH developed and approved the National Policy for Quality Assurance of Pharmaceutical Affairs in 2015, which is available on the GDPA homepage. Based on the mentioned Policy, GDPA has developed a Draft Sampling Procedure for Pharmaceuticals (Laiha) and submitted it to the National Board for Pharmaceuticals and Food for approval.
172	Standard monitoring mechanism for the process of pharmaceutical quality control developed	172.1	MOPH	Standard monitoring mechanism in the process of pharmaceutical testing established within the quality control laboratory	Medicine Quality Control	(22. Sep. 2014) - The lack of transparent evaluation criteria of laboratory procedures and oversight and the lack of required equipment in the quality control laboratory slow down the sampling process and creates opportunities for manipulation.	(31 Dec. 2015) - The National Board of Pharmaceuticals and Food is responsible for regulating, coordinating and monitoring all activities related to drugs and food. Based on the System Enhancement for Health Actions (SEHAT) Program proposal, which is supported by the World Bank, one of the med-term objectives is to obtain the International Standardization Organisation (ISO) certificate and assure external monitoring mechanism of the quality control process. A copy of the mentioned proposal has been shared with MEC.
173	Pharmaceutical pricing mechanism developed for importing companies	173.1	MOPH	Establishment of a mechanism for price verification in invoices developed	Medicine Pricing	(22. Sep. 2014) - No mechanism exists to monitor and verify pricing structures based on pro formas or purchasing bills.	(31 Dec. 2015) - The GDPA has recently developed a pricing procedure which was shared with MEC. Additionally, the GDPA has discussed the possibility of developing a comprehensive pricing policy with WHO. According to GDPA, WHO has declared its willingness for cooperation.
		173.2	MOPH	A plan for the implementation of legal provisions in regard to printing prices on pharmaceutical packaging by producing companies developed	Medicine Pricing	(22. Sep. 2014) - The manipulation of purchase prices is easy due to the existence of different market prices.	(31 Dec. 2015) - According to the new Pharmaceuticals Registration Guideline, all existing and newly imported medicine must have a registration number. According to the GDPA, the development of a Pricing Guideline in cooperation with WHO is planned
		174.1	MOFA	The MoFA amends the Law on Diplomatic and Consular Staff to require all MOFA senior officials, including ambassadors and consuls, to possess at least a Master's Degree in a relevant subject area, including, but not limited to, international affairs or political science.	HR-Policy MOFA	(30 May 2015) - Illegal hiring practices, such as nepotism, are ubiquitous at MOFA, and successful applicants occasionally possess only a high-school degree.	(31 Dec. 2015) - MOFA has recently established a committee chaired by Deputy Minister for Admin and Finance with the participation of the Treaties and Legal Department, Institute of Diplomacy and HR Department, to review the Law on Diplomatic and Consular Staff and the Recruitment Procedure of Diplomatic and Consular Staff.
174	Enhance transparency in MOFA's hiring processes and take appropriate measures to ensure that all MOFA employees meet certain clearly defined standards.	174.2	MOFA	MOFA institutes a policy specifically prohibiting nepotistic hiring practices.	HR-Policy MOFA	(30 May 2015) - No such policy exists, and nepotism is still practiced at MOFA.	(31 Dec. 2015) - A specific Policy on prohibiting nepotistic hiring practices is not in place. However, provisions of the Law on Diplomatic and Consular Staff and Recruitment Procedure of Diplomatic and Consular Staff are enforceable. According to MOFA, to ensure transparency in the recruitment process, annual exam is conducted for new appointments. However, illegal interference in the appointment process is persisting.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
175	National Teaching Skills Examination process reformed	175.1	MOE	MOE defines clear and transparent need assessment criteria for teachers positions to ensure that recruitment is conducted based on needs and avoid nepotism.	HR-Policy MOE	(30 June 2015) - There is a lack of clearly defined need assessment criteria for the new teachers positions.	(31 Dec. 2015) - According to MOE, teachers are recruited based on the current needs. There is a procedure in place which has been reviewed and updated in 1382, called the Procedure for Establishing and Promoting a School and Educational Normative. According to this procedures, the following criteria are applicable: Classes (1 - 3) one teacher, Classes (4 - 6) 1.4 teachers, Classes (7 - 12) 5.1 teachers. Criteria for the maximum number of students in one classroom are as follows: Classes (1 - 6) max. 40 students Classes (7 - 9) max. 35 students Classes (10 - 12) max. 30 Students. However, there is no transparent mechanism for the application of these criteria.
		175.2	MOE	The Teachers Recruitment Commission is granted an efficient and clearly defined role in the assessment phase.	HR-Policy MOE	(30 June 2015) - The teacher recruitment commission has a symbolic role in the process. And ignoring their role in scoring and practical employment.	(31 Dec. 2015) - A Proposal on the mandate of the Teachers Recruitment Commission has been developed and approved. Based on the proposal, the commission is responsible for conducting the National Teaching Skills Examination on provincial level with the participation of two monitors from Kabul (1 member of the monitoring directorate and 1 member of the teachers training directorate). The results of the test should be analyzed and scored by the commission and the list of scores published in the provincial Directorate of the MOE. List of the successful candidates are being sent to Kabul for the recruitment process.
		175.3	MOE	The Teacher's Complaint Commission is separated from the recruitment board and its members are not to be part of the teachers recruitment board.	HR-Policy MOE	(30 June 2015) - The provincial Education Director is heading both recruitment and complaints commissions. And all those who have complaints, first should convince the director to refer their complaints to the complaint board.	(31 Dec. 2015) - According to the HR Department (Recruitment Unit) of MOE, there is no Complaints Commission in the MOE, all complaints regarding the recruitment of teachers and other employees are dealt with by the Complaints Commission of IARCSC. However, MOE's HR Department has a complaint manager and the Minister's Office has a complaints unit. However, the Teachers Recruitment Procedure (Laiha) stipulates in Chapter 9, titled "Complaints Commission": "In case an applicant does not agree with the result of the exam, he can officially file a complaint to the Deputy Minister of Admin in Kabul or the Director of Education in Provinces." Article 29 of this Laiha regulates the composition of the complaints commission in Kabul and other provinces.
		175.4	MOE	MOE publishes exam results on its website and newspapers.	HR-Policy MOE	(30 June 2015) - The list is not shared publicly, which effectively allows officials to tell people they have failed, when in fact they might have passed, in order to solicit bribes	(31 Dec. 2015) - MOE does not publish exam results on its website or newspapers. However, according to the HR department of MOE, exam results are announced on the pin boards of the provincial directorates of MOE.

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176	Eligible and qualified teachers hired	176.1	MOE	Contracted teachers are recruited through free competition.	HR-Policy MOE	(30 June 2015) - Teachers are hired through different process by undue influence on ministry's management by parliament and influential personalities for example special appointments, contractors etc.	(31 Dec. 2015) - According to the HR Department (Recruitment Unit) of MOE, contracted teachers have not been hired for two years now. Nonetheless, there are contracted teachers still in the structure of the MOE.
177	Ghost positions are identified and taken off the payroll	177.1	MOE	MOE in cooperation with IARCSC establishes a committee to identify all ghost positions and take them off the payroll.	HR-Policy MOE	(30 June 2015) - Teachers failing to show up to work or existing in name only, has been a problem in Afghanistan for years, these teachers mainly exist in insecure areas and waste government financial resources.	(31 Dec. 2015) - According to MOE, an envoy under the chairmanship of Deputy Director of Admin has been appointed to identify ghost positions. The envoy has started in Herat province and will continue in other provinces as well. The findings of the envoy will be reported to the Ministry after completion. Additionally, based on the proposal of the HR department which was approved by the ministry, extraordinary appointments beyond the National Teaching Skills Examination are stopped.
178	IT infrastructure provided for the examination and appointment process of teachers	178.1	MOE	MOE computerizes the examination process with specific ID-Number that minimizes score alteration and other types of frauds.	HR-Policy MOE	(30 June 2015) - Exam results are compiled on a list that is sent, along with the original exams, to Provincial Education Directorates. This was cited as one of the most significant corruption vulnerabilities as the lists are easily manipulated and no effort is made to verify the lists with the original exams.	(31 Dec. 2015) - The National Teaching Skills Examination process has not been computerized yet. However, according to the HR department of MOE, a database of MOE employees and teachers has been established with the support of the WB. The Database is completed in Kabul and 15 Provinces and other provinces will follow. 5 provinces are linked to Kabul. The database include the following information: Full identity of teachers and admin employees, education degree, photo, fingerprint, work place, recruitment code and score in the National Teaching Skills Examination.
179	Anti-corruption measures included in the 100-Day Plans	179.1	All GOS	A specific section addressing anti-corruption initiatives exists in all future 100-Day Plans	100-Day Plan	(15 Aug. 2015) Only six ministries explicitly included anti-corruption sections in their 100-Day Plans	(31 Dec. 2015) - The 100 days plans of the MoCI, MoPW, MoMP, MoRR, MoHE, MoJ, MoLSAMD and AISA has a specific component on the Anti-corruption. The MEC Secretariat has practically observed the above-mentioned 100 days plans.
		179.2	All GOS	Anti-corruption measures are effectively monitored by the AOP	100-Day Plan	(15 Aug. 2015) - The AOP is in the process of reviewing the first set of 100-Day Plans.t.	(31 Dec. 2015) - MoRR, MoHE, MoPW, MoHRA have shared their reports on 100 day plans' implementation with MEC. In addition, MEC has requested the 100 days plans' implementation status reports from AOP, by the official letter #: 2793, dated 24/10/1394.
180	Timely public access to all 100-Day Plans	180.1	All GOS	Online publication of all 100-Day Plans on the official website of relevant ministries and institutions.	100-Day Plan	(15 Aug 2015) - Some of the institutions only provided oral summaries of their Plans to the President and did not publish them.	(31 Dec. 2015) - MoRR, MoJ, MoHRA, MoCI, MoCIT, MoPW have published their 100 days plans on their websites. The MEC secretariat has observed the above-mentioned 100 days plans on their websites.
181	Organizational structure of the Office of Electronic ID Project reviewed and reformed and the technical positions are re-announced to recruit qualified candidates through a competitive process.	181.1	MOI	For the purpose of transparency in the process and merit based recruitment, MoI, IARCSC and IOW jointly reform the organizational structure of the Electronic ID Project and re-announce the positions to recruit qualified candidates through a competitive process.	E-ID	(30 Sep. 2015) - Recruitment without consideration of Civil Servants Law and specific standards has paved the way for recruitment of unprofessional and unqualified people in technical positions. Due to illegal interference, several members of the same family has been recruited in the Project.	(31 Dec. 2015) - According to the head of HR of Electronic ID, the draft organizational structure of the Electronic ID has been prepared and sent to the Presidential Office for approval. However, the draft has not been approved yet. Additionally, the contract of 1045 contract workers of the project will expire on Dec 21, 2015. Since there is no budget for paying these workers, their contracts will not be renewed.

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182	Impartial and neutral audit of the contract with GTR.	182.1	MOCIT	To ensure transparency in the GTR contract, MoCIT initiates an audit of the procurement process of the mentioned contract through an unbiased third party highlighting the corruption issues in it.	E-ID	(30 Sep. 2015) - The Contract of establishing the system and procuring the equipment for the Electronic ID Project with GTR Company which is worth \$ 101 million, is complex and makes corruption existence presumable.	(31 Dec. 2015) - The recommendation has been shared with MOCIT through an official letter on 1. Nov. 2015. According to the MOCIT, an experienced international third party will be hired to assess the contract from a financial and technical perspective. The budget for this assessment has been allocated and the contracting process will start soon. MOCIT hopes to have the final report by April 2016.
183	Increased efforts by the international community to transfer responsibilities for development programs to the Afghan government.	183.1	IARCSC	IARCSC & MoF intensify their efforts to accelerate pay-grade reforms and ensure that the advisory panel on senior appointments and the Independent Administrative Reform and Civil Service Commission (IARCSC) are effective, fair, and transparent.	HR-Policy IARCSC	(08 Nov. 2015) Multiple sources report that the panel on senior appointments and the IARCSC are not adequately fulfilling their responsibilities to employ fair, transparent, and merit-based processes.	(31 Dec. 2015) - IARCSC has completed the pay-grade system in all government institutions except MOFA and AGO. The advisory panel on senior appointments was never under the authority of IARCSC but was working directly for the President. Only positions of grade 1 and 2 of civil servants were under the authority of the appointment board, where the board currently has only an observing board.
184	Aid programs continue produce tangible results after foreign financial assistance ends	184.1	International Community	Major donors consider a sustainability plan for post-project operations and maintenance (O&M) in the program-design stage for their projects.	Project Sustainability	(08 Nov. 2015) Comprehensive sustainability plans for post-project O&M activities are not always included in the project-design phase.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
185	Afghan-specific donor best practices captured in an accessible format for future use.	184.2	MOF/MOEC	MOF & MOEC take concrete steps to decrease the over-reliance on external funding to support national development.	Donor Coordination	(08 Nov. 2015) Despite the overall reduction in funds for development, the majority of sectors still remain over-reliant on external funding.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
186	Measures taken to ensure that aid programs are consistent with national and local development priorities.	185.1	International Community	Major donors compile a compendium of "best practices" to share with successor personnel at their own agency and with their international counterparts.	Donor Coordination	(08 Nov. 2015) Hard-won lessons and experiences are often not captured in an accessible form for posterity because of frequent staff turnover at many donor agencies.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
186	Measures taken to ensure that aid programs are consistent with national and local development priorities.	186.1	MOF/MOEC	Relevant ministries implement improved processes to assuage donors' doubts about their program management and budgeting procedures	Donor Coordination	(08 Nov. 2015) Alignment of aid programs with Afghan priorities still a challenge although progress made in this regard	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.

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187	Measures put in place to better safeguard international-assistance funds from corrupt actors.	187.1	International Community	Key donors increase publicly available information about their aid programs (e.g. the program, content, results, beneficiaries and evaluation reports of the programs) at the national and provincial level, by making it available in the DAD.	Donor Coordination	(08 Nov. 2015) A significant amount of information on aid programs would be difficult to access for rural citizens or those lacking appropriate language skills and/or internet access.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
		187.2	International Community	Key donors harmonize their aid support with any new anti-corruption strategy implemented by the new government.	Donor Coordination	(08 Nov. 2015) The new government has not developed a new national anti-corruption strategy.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
188	Strengthened support for national development policies and development assistance	188.1	MOF/MOEC	MoF & MoEC develops MoUs with all major donors in which mutual obligations and responsibilities are clearly identified.	Aid Coordination	(08 Nov. 2015) Not all the MoUs signed between donors and GIROA contain clearly defined mutual commitments.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
		188.2	MOF	The MoF and donors agree on a country-level mechanism for mutual assessment of aid effectiveness.	Aid Coordination	(08 Nov. 2015) No mechanism exists for a mutual assessment of aid effectiveness.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
		188.3	International Community	Key donors ensure that all aid programs' impacts are evaluated and financial expenditures are independently audited and made available to the public (contingent on donor countries' applicable laws).	Donor M&E	(08 Nov. 2015) Not every program is evaluated and audited independently, and many such reports are not made public.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCSC. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.

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189	The information exchanged between the Afghan government and donors is improved in terms of quality, quantity, and timeliness.	189.1	MOF	The MoF drafts plans to improve the quality and amount of information entered in DAD (e.g. information on the long-term commitment of the program, content, results, beneficiaries and evaluation reports of the programs).	Donor Coordination	(08 Nov. 2015) The current DAD often lacks information about multi-year donor commitments, aid programs' contents and current funding status, and program outputs.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
		189.2	MOF	A restructured DAD is debuted by January 2016, in English, Dari and Pashto, and made accessible to the public at large and to the donor community.	Donor Coordination	(30 Dec. 2014) As currently constituted, it can be difficult to obtain an accurate, complete, and up-to-date picture of all aid programs from the DAD.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
190	A nationwide assessment of foreign assistance is jointly conducted by GIROA and donor representatives to determine sectors and regions most in need of assistance.	190.1	MOF/MOEC	The MoF & MoEC, in consultation with UNAMA, drafts a plan to conduct an assessment that takes into account the distribution of funds by sector and by region.	Aid Coordination	(08 Nov. 2015) Geographic and sector disparities persist in the allocation of funds.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
		191.1	MOF	A nationwide independent commission for aid effectiveness is established by MoF and MOEC and with the support of donor community	Aid Coordination	(08 Nov. 2015) No independent, Afghan-led body exists to monitor aid programs.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
191	Aid programs are effectively monitored by donors and by the Afghan government.	191.2	MOF	The MoF in consultation with donor representatives, develops a plan for such a commission that would issue annual reports assessing the effectiveness of all foreign-assistance delivered to Afghanistan.	Aid Coordination	(08 Nov. 2015) No such plan has been drafted.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
		191.3	MOF/MOEC	Agreement is reached between the Afghan government (MoF & MoEC) and major international stakeholders to draw up a comprehensive set of aid effectiveness indicators.	Aid Coordination	(08 Nov. 2015) No agreed-upon set of aid-effectiveness indicators exists that can be used both by the government and by the donor community.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.
192	Increased amount of donor assistance channeled through national budget, if the Afghan government meets defined commitments to reduce corruption and increase financial transparency.	192.1	MOF/International Community	Key donors and GIROA (MoF) adhere to the benchmarks set forth in the TMAF.	Aid Coordination	(08 Nov. 2015) While some donors are already in compliance, insufficient information exists to render a judgment on every donor.	(31 Dec. 2015) - MEC's Secretariat sent the report and recommendations on international aid effectiveness via letters # 2724, 2725 and 2726 dated 23/08/1394 to MOF, MOEC and IARCS. In addition, the recommendations have been sent to the key international donors. While, MEC's Secretariat has not received any report on the implementation status of recommendations yet.

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193	The reporting process improved and discrepancies in EQUIP's reporting system removed	193.1	MOE	EQUIP develops a quarterly and annual consistent reporting system which provides a true and fair picture of the program's progress and achievements	EQUIP	(4 Nov. 2015) Currently, there are discrepancies in the figures between the reports of the World Bank, Teachers Education Department and EQUIP.	(31 Dec. 2015) - According to EQUIP, they provide six month and annual reports and share with the World Bank. In view of the fact that there are differences in the reports provided by EQUIP and the World Bank, several meetings were held with the World Bank to overcome this shortcoming and as a result the problem has been solved. However, the findings of MEC secretariat still reflects the differences in the figures of the World Bank and the EQUIP. For instance, report provided by EQUIP during the second half of 2014 indicates that 150, 811 teachers trained through Inset - V program while World Bank report shows 154811 teachers trained. Copy of the reports shared with MEC secretariat.
194	Inspection and clarification of corruption cases in the process of food distribution at MOE during 2002 to 2013.	194.1	MOE	MOE conducts an inspection of the food distribution process covering the period of 2002 - 2013 in its offices and provincial directorates, identifies the actors involved in embezzlement, and refers all cases to the AGO for prosecution.	WFP MOE	(4 Nov. 2015) The distribution of food funded by WFP, especially biscuits distributed in schools through the MOE, was plagued by embezzlement, which caused a waste of more than 20% of the project funds.	(31 Dec. 2015) - MOE has not yet conducted any assessment concerning distribution of food and biscuit.
195	Establishment of an effective and transparent electronic procurement system	195.1	National Procurement Authority	Electronic procurement system developed by General Directorate of National Procurement	Procurement	(9 Dec. 2015) - No electronic system developed by General Directorate of National Procurement	(31 Dec. 2015) - According to Procurement Law, Article 4 (4), matters relating to procurement are set in a separate regulation. Meanwhile, the National Procurement Authority has taken certain actions in the implementation of electronic procurement in Afghanistan including the establishment and updating of a website for National Procurement Authority, publishing the Procurement Law, Procurement Procedures, bidding documents and other forms and standard procurement documents, publication of procurement announcement, notifications of decisions on awarding the contracts; list of deprived bidders and contractors who are excluded to participate in the public tenders. In addition, it is intended to assess practical grounds for the electronic procurement during new fiscal year and also develop its implementation strategy. It is worth mentioning that the issue of electronic procurement has been outlined in the National Procurement Authority 5-year's strategy as one of the strategic objectives of this authority.
		195.2	National Procurement Authority	Electronic procurement system implemented by General Directorate of National Procurement in all government institutions	Procurement	(9 Dec. 2015) - No electronic system implemented by General Directorate of National Procurement	(31 Dec. 2015) - Based on the National Procurement Authority report, it is intended to assess practical grounds for the electronic procurement during new fiscal year and also develop its implementation strategy. It is worth mentioning that the issue of electronic procurement has been outlined in the National Procurement Authority's 5-year strategy as one of the strategic objectives of this authority.

No.	Indicator	No.	Inst.	Recommendation	Sec.	Baseline	Status
196	Reform in recruitment process of procuring entities	196.1	National Procurement Authority	Assure the recruitment of honest and reputable procurement employees in all procuring entities, especially in the General Directorate of National Procurement .	Procurement	(9 Dec. 2015) - The General Directorate of National Procurement has partially implemented a HR reform.	(31 Dec. 2015) - Based on the part 9 paragraph 1 of Article 57 of Procurement Law, the National Procurement Authority has the following competencies: human resources development, professional development, conducting training programs and awarding certificates, management of professionals and cadre affairs and employees of procurement in accordance with the procurement procedures. National Procurement Authority intends to establish the cadre affairs section for procurement staff within its structure to ensure the implementation of above-mentioned issues.
197	Prevention of conflict of interest in public procurement	197.1	National Procurement Authority	Identity of the owners of the contracting companies publicized.	Procurement	(9 Dec. 2015) - Identities of the owners of the companies are not publicized.	(31 Dec. 2015) - In order to avoid conflict of interest, the Procurement Law states the issues as follow: Article 24 (3): Conflict of interest is a situation that procurement officials, including granting authority somehow benefits the procurement or being a relative of one of the bidders. Relatives in this sense are: children, father, grandfather, mother, grandmother, spouse, brother, sister, aunt, uncle, and their descendants to the second degree, parents of spouses and their siblings, son's wife or daughter's husband. Based on part 4 paragraph 1 of article 47 of Procurement Law, procurement employees are obliged to observe the following issues: " Nil direct or indirect conflict of interest." Moreover, Procurement Procedure, Article (108) states: In case of conflict of interest and before the start of any procurement activities or approval of which, all procurement employees, evaluation team, offer opening team, granting authority and members of the National Procurement Commission shall clearly state the issue (In the form Indicated in Annex 4). Nonetheless, the publication of identity of the contracted companies' owners is currently not possible due to security concerns.

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