

Policy  
brief

# LOANS TO COUNTRIES DURING THE PANDEMIC

The idea of this study is a comprehensive assessment of international financial assistance projects that countries receive from IFI. The formation of the rating and ranking of indicators according to six different criteria is a way to identify the main problems and study the best practices for transparency and accountability of states.

This material contains the results of the project evaluation of IFA in 5 states, which were involved in the fight against the Covid-19 pandemic throughout 2020. The assessment was carried out by representatives of NGOs from the countries under study based on the methodology developed by the TT «Institute of Analysis and Advocacy»: «Methodology of public self-assessment of International Financial Assistance»

According to the results of the study, the states were ranked on a scale from 0 to 100 points on their transparency and accountability in the use of the IFA as follows:

1. Moldova - 62 points
2. Kazakhstan - 59 points
3. Ukraine - 52.5 points
4. Kyrgyzstan - 45 points
5. Tajikistan - 20 points

The proposals at the end of this report are primarily aimed at representatives of NGOs that specialize in public finance issues. The proposals are based on prototype solutions that currently work and show their effectiveness in the countries under study.

**Author:**

Olena Dmytrenko - *senior Analyst of the TT «Institute of Analysis and Advocacy»*

**Evaluation of projects in countries:**

Kazakhstan: PF «Zertteu Research Institute»

Kyrgyzstan: Bakytbek Satybekov, SA «CSR Central Asia»

Moldova: Institute for Strategic Initiatives of Moldova (IPIS)

Tajikistan: NGO Jahon

Ukraine: TT «Institute of Analysis and Advocacy»

**Layout and design:**

Olena Ovsianyk - *graphic designer of the TT «Institute of Analysis and Advocacy»*

*The material was prepared with the support of the International Renaissance Foundation as part of the Transparent and Accountable Financial Support to Countries to Combat the Spread of COVID-19 project.*

*The material reflects the position of the authors and does not necessarily converge with the position of the International Renaissance Foundation.*

## CONTENT

04

FOREWORD

06

CHAPTER 2. Rating

18

CONCLUSIONS AND  
PROPOSALS

05

CHAPTER 1. Methodology

08

CHAPTER 3. Estimation

## ABBREVIATIONS

**CEB**

Council of Europe Development Bank

**IFI**

International Financial Institution

**IMF**

International Monetary Fund

**EBRD**

European Bank for Reconstruction and  
Development

**IFA**

International Financial Assistance

**NGO**

Non-governmental organization



## FOREWORD

Today, there are many ways and types of loans, and obtaining them is not difficult. Whenever the size of our needs does not match the size of our financial possibilities, we have two options: refuse to meet the need or look for resources on loan.

So what happens, when it is not about one person, but about the nation? When there are not enough resources for the whole state to provide for the needs of its citizens, it is impossible to simply refuse people treatment, education, and protection. The issue of a shortage of resources and the routine search for its replenishment is eternal for the lion's share of modern authorities. These are not always "consumption debts", often external loans are used as investments while developing the state's economy for the future.

It is the people who should benefit from lending to certain industries, they will also pay for the repayment of loans. For this reason, citizens should keep their own records of the country's debts, evaluate the rationality of attracting them and participate in decision-making regarding the state's debt policy.

Last year, due to the coronavirus pandemic, was a turning point for the whole world and affected absolutely all spheres of human life. Borrowing instruments became especially relevant, as many countries were not ready for the enormous costs, which, moreover, became spontaneous. At the same time, observance of the principles of openness and accountability of the state and the budget faded into the background.

In order to return to the agenda one of the most important characteristics of a democratic state – public control and participation, we conducted this study. Its basis is a comprehensive system for evaluating international financial assistance that states receive, primarily in debt. We focused on the study of resources that were directly involved in the fight against coronavirus infection only in 2020 from international financial institutions. According to the developed evaluation system, we can apply a comparative approach to determine the level of transparency, accountability, or public participation in different states.

The assessment tool was also used by non-governmental organizations of the Republics of Moldova, Kazakhstan, Kyrgyzstan, and Tajikistan. Thanks to this, this material contains the results of an analysis of international financial assistance to combat the pandemic in 5 states.

## CHAPTER 1. METHODOLOGY

At the center of the system for evaluating international financial assistance is the citizen – the taxpayer. The entire system of this assessment is built from the position of accessibility and clearness for a citizen of information about loans and non-refundable assistance received by the state.

Three types of IFA are taken as the basis of the study: general loans, targeted loans, grants<sup>1</sup>. The first ones are borrowed by the country and end up in the treasury, used for needs (for example, IMF loans); the latter are borrowed, placed on special accounts or funds, and used for project tasks (for example, EBRD loans); the third ones are provided as technical assistance from donors, are non-refundable, and are used for project tasks.

The assessment system is built on 6 principles, each of which corresponds to a criterion with a different set of indicators:

<i>Criterion</i>	<i>Number of indicators</i>
Openness of information	4
Completeness of information	17 (15)*
Publicity of reporting	4
Transparency	5
Public participation	5
Accountability for spending	7
Total score	42 (40)

*\*- different number of indicators for different types of IFA*

To measure the level of compliance with each of the criteria, a system of simple indicators based on closed questions is used. The source of information for this assessment is the national Internet network (only data that is published in the public domain). The collection of information and the initial assessment of the indicators were carried out by specialists from the non-governmental sector of the countries under study. In this case, only projects received by states in 2020 for the purpose of countering the pandemic were selected for analysis. Taking into account the peculiarities of access to information in each state, this report may include a non-exhaustive list of the IFA projects involved by the country in the fight against COVID-19.

The final assessment of all indicators and criteria is on a scale from 0 to 100 points, where:

0 points – the process of attracting, distributing and spending the IFA in the country is completely closed to the public;

100 points – the process is open, there is enough information, and it is understandable, the public can join in the formation of policy in the field of IFA.

---

<sup>1</sup> The names of the IFA types were assigned by the authors of the study to unify the data. In each of the countries under study, the attraction tool may have a different name, while the essence of the identified species for the countries under study is the same.

The intermediate scale is conditionally divided into 4 levels:

<i>Level</i>	<i>Meaning</i>	<i>Score</i>
red	information about the IFA is not available, processes and results are hidden from citizens	0-24
orange	information is published partly on certain aspects of the IFA or only on part of the projects	25-49
yellow	the process of attracting and using the IFA is generally open, there is not enough data to form a complete picture, but enough for a basic understanding	50-74
green	the process of attracting and using loans can be called transparent, the data is open, additional tools are used to systematize and communicate information about the IFA	75-100

The system for assessing and calculating the final score is described in detail in the document «Methodology of public self-assessment of International Financial Assistance», developed by the Institute of Analysis and Advocacy in 2021 based on Ukrainian practice.

According to the methodology described in the mentioned document, and also with the help of partner NGOs in the countries studied, we assessed the IFA system from the perspective of society in 5 EECA countries.

## CHAPTER 2. RATING

International financial assistance is a rather broad concept, which includes a number of tools and mechanisms through which the state receives finance, both credits and free of charge. In this study, we consider three tools for attracting IFAs: general loans, direct loans, and grants.

According to the developed assessment tool, the projects of the IFA were analyzed in 5 countries. Based on the results of the assessment, the following rating was formed:

 Moldova - 62 points

 Kyrgyzstan - 45 points

 Kazakhstan - 59 points

 Tajikistan - 20 points

 Ukraine - 52.5 points

We should also note methodological limitations in relation to Kazakhstan, where only two projects were evaluated, which could provoke an error in the final score.

In general, none of the studied states is located in the so-called «green zone», which implies the presence of 75 or more points. This ideal model, according to the concept of evaluation, is characterized by full openness, transparency, and participation of citizens in the process of attracting and implementing projects of the IFA. A common characteristic for all the studied countries, regardless of their final score, was the lack of a focus on taxpayers. Despite the fact that almost all countries have laid the foundation for a course on transparency in the use of loans and grants in the form of digital solutions, they are not completely integrated tools. At the same time, such issues as public participation or accountability of IFA expenditures for the countries under study are developed very little.

Criterion	Kazakhstan	Kyrgyzstan	Moldova	Tajikistan	Ukraine
Openness of information	75	51,6	60,9	29,5	55,2
Completeness of information	78	63,3	69,5	33,4	72,8
Publicity of reporting	31,3	28	65,6	14,8	53
Transparency	30	36,3	65	3,6	25
Public participation	0	18,8	46,3	5,5	20
Accountability for spending	85,7	34,8	50	9	45,2

Countries do not provide special mechanisms for public participation in the issues of the IFA. In Ukraine, Moldova, and Kyrgyzstan, isolated cases of public consultations and discussions on the focus group of issues related to targeted loans and grants were noted, but such activities are not systematic. Most often, the involvement of the public is limited to informing them about the attraction or implementation of the projects of the IFA in the state.

Regarding to the accountability of spending, the countries have a number of similar features:



general loans entering the treasury cannot be identified further. Their path to the final beneficiary cannot be tracked. The accountability of this money is the same as the accountability of budget expenditures in the state. Therefore, countries with open procurement systems and public budget reporting generally have a higher level of accountability for general borrowing spending.



expenditures of targeted loans and non-repayable aid are more often closed. The policies and procedures by which goods, works, and services are purchased are known, and procurement plans are sometimes available. Information about procurement and contracts are almost always closed. For the most part, for these types of IFAs, many aspects are managed by the lender or donor, using their own procedures. Also, it is lenders who most often act as holders of resources for collecting and systematizing data on loans in a particular state.

The indicators of public reporting are also quite low. The most difficult situation is with interim and final reports on the results of project implementation. During the analysis, it was noted that information on the goals, amounts, and terms of loans is almost always available, at the same time, documents characterizing the achievement of goals or the rationality of cash expenditures are rare.



# KAZAKHSTAN

In the Republic of Kazakhstan two projects were analyzed for evaluation, one of which is a loan, the second is gratuitous. In general, the country recorded three projects that were involved in 2020 to fight the pandemic.

The total score of the two projects was 59 out of 100. This indicates that the state has difficulties with public access to information about financial support for Kazakhstan.

*Chart 1. Assessment of international financial assistance by criteria*

<i>Criterion</i>	<i>Grand aid</i>	<i>General loans</i>
Openness of information	50	100
Completeness of information	59	100
Publicity of reporting	12,5	50
Transparency	0	60
Public participation	0	0
Accountability for spending	86	86

It can be seen from the chart that the greatest difficulties are related to the aspects of transparency and public participation. In general, government loans are more malleable for citizens to study and evaluate than the assistance that the country receives free of charge. General loans go directly to the treasury and are spent from it according to the same rules as budget money. This explains the rather high score in the transparency criterion. The main difficulty lies in the fact that among the total volume of budget expenditures, it is impossible to identify the part that, under the auspices of the fight against the pandemic, fell into the budget and establish what it is subsequently spent on. In this case, there is no accounting and evaluation of individual programs for which general loans are attracted, this money is considered as part of the state budget. Accordingly, there is no competitive selection of performers, digital resources for systematization and disclosure of data on such loans, or itemization of loan costs. These difficulties are provoked, for the most part, by objective limitations. While the lack of information on the progress of the programs or the use of loan funds are issues that can be resolved.

Grant aid has a different mechanism for attracting and spending funds, it is less accessible to citizens and malleable for study. The assessment shows that little is known about grant projects to the public, only their basic characteristics are publicly available. It is currently impossible to trace the progress of such projects or their effectiveness, although the assessment of expenditure accountability shows that information about purchases for this money is open, and projects are audited. However, the state does not publish interim or final information on the achievements of the project, as well as implementation plans. There are no digital tools for collecting, systematizing, or demonstrating data on the attraction of grants.

If for general loans, a bald spot in the assessment is rather an objective reality, then for gratuitous assistance, most of the flaws can be corrected with a targeted policy.

Non-governmental organizations do not have information about any state activities to involve the public, consult with them, or purposefully inform them. Among the countries studied, Kazakhstan is the only one where none of the 5 indicators of public participation is used (or information about this is not available to national non-governmental organizations). NGOs, in turn, note:



In order to ensure transparency and sustainability in the preservation of data on implemented projects, it is necessary to create a single permanent electronic platform for all projects implemented with the support or jointly with international financial organizations



# KYRGYZSTAN

In the Republic of Kyrgyzstan, 8 projects of international financial assistance were selected for analysis. All studied projects are credit, half of which are targeted loans, and half are general loans. The final score according to the results of assessing the loans attracted to fight the coronavirus for 2020 in the republic is 45 out of 100. The projects that were implemented for the same purposes at the expense of gratuitous assistance from international financial organizations in 2020 were not recorded.

*Chart 2. Assessment of international financial assistance by criteria*

<i>Criterion</i>	<i>Targeted loans</i>	<i>General loans</i>
Openness of the information	47	56
Completeness of the information	54	73
Publicity of reporting	34	22
Transparency	42,5	30
Public participation	27,5	10
Accountability for spending	36	34

According to the chart, it is clear that the best way is to ensure the openness and completeness of information related to attracting loans to the state. The least implemented, as in neighboring Kazakhstan, are indicators of public participation in the debt policy of the state. Although, in this case, the score is higher than 0, to a greater extent due to indicators that indicate passive instruments of public participation: providing the public with up-to-date information on the implementation of loans; the presence in the projects of plans for communication with stakeholders. In total, in one of 8 projects, a case was noted of bringing issues related to the attraction or implementation of the project for discussion with the public.

In total indicators, the difference between targeted and general loans is 1 point, that is, the rating score is equally low for both types of loans. For general and targeted loans, a number of common problems were noted related to the publicity of reporting and the transparency of attracting and using international financial assistance. The publication of interim loan reports is practiced, along with this, its sources are the information resources of creditors and not responsible government agencies. State executors, according to

the assessment, do not inform the population about the progress of projects that are implemented through general loans. The republic also does not have its own digital tools for collecting, systematizing, or analyzing information on external financial assistance that comes to the republic. Most often, electronic resources for demonstrating joint projects and their financing are maintained by the lenders themselves. It is due to this aspect that the scores on the criterion of transparency exceed the level of complete closure.

In terms of accountability for spending general loans, the government uses the national e-procurement system when spending. Due to the peculiarities of this type of loan assistance, it is impossible to accurately identify which purchase was made for which program. In the case of directed loans, procurement systems and procedures are closed to the public. The exception is loans from the World Bank, which publishes procurement plans and information on procedures on its resources.

Non-governmental organizations in Kyrgyzstan also focus on the problem of access to information, in particular, on the financial component of the IFA.

As the media publishing house «Kloop» notes:

”

In general, in Kyrgyzstan, you can find information on the monetary and commodity aid coming to the country, but it is fragmented, there is no single source where all grants and humanitarian aid would be listed. Information on spending – to whom, when, and for what exactly money or humanitarian aid was allocated, is not publicly available



# MOLDOVA

In the Republic of Moldova, 4 projects of international financial assistance were selected for analysis, 3 of which were targeted loans. The overall score for the state is 62 points out of 100, which is the highest result among the five countries studied. General loans for the fight against the pandemic were not recorded during 2020.

*Chart 3. Assessment of international financial assistance by criteria*

<i>Criterion</i>	<i>Grant aid</i>	<i>Targeted loans</i>
Openness of information	69	58
Completeness of information	91	62
Publicity of reporting	100	54
Transparency	100	53
Public participation	60	42
Accountability for spending	57	48

In contrast to the other countries studied, Moldova has a rather high rate of public participation, both in the process of attracting loans and grants. Predominantly, scores are obtained through passive forms of participation, such as informing or publishing stakeholder engagement plans. At the same time, two cases of using active participation tools were recorded in Moldova - consultations with the public and the submission of issues to a meeting of the advisory council.

Another significant aspect of the Moldovan system for managing international financial assistance is the availability of open data on projects operating in the country. With regard to gratuitous assistance, the state has its own electronic resources that allow you to obtain information about the financing, implementation of the project, and its executors. For targeted loans, the republic also created a separate accounting portal, which allows you to get acquainted with information about projects and loans. According to the assessment, not all active loans are displayed on the portal. At the same time, the structure of the resource is complex, due to which, the presence of complete information about projects in it also ensures compliance with the criteria of openness and completeness. For World Bank projects, their own resource remains the most complete database of projects and loans. With regard to expenditure accountability, the Moldovan public has access to information on procurement

procedures through loans and grants, which are 100% competitive. However, structured and complete information about the winners, goods, or contracts that are concluded upon completion of the procurement was not publicly noted. It was also recorded that none of the studied projects was audited during the year, or the fact of the audit and its results were closed to the public.

In general, in the republic, the public has the opportunity to receive information about loans and financial assistance, and track progress in the implementation of projects and financial receipts in the country. The problematic issue is updating the data and their systematization, since the information is scattered and mainly contained on the portals administered by the creditors themselves. The chart above shows that non-repayable aid projects are more adapted to public involvement, information is more often published on national resources, and NGOs are involved in their coordination.

With regard to the IFA, received to combat the pandemic, Moldovan NGOs note:



During the state of emergency, it was possible to track external assistance in response to the COVID-19 pandemic only by accessing the text of the decisions of the Commission for Emergency Situations. This information was made available in the context of VAT (value added tax), import and customs duty exemptions granted by the Government for donations offered to the Republic of Moldova (medicines, gloves, masks, protective screens, respirators, protective overalls). It is still unclear how this medical equipment was distributed to medical facilities, and how the Ministry of Health, Labor and Social Protection ensured proper distribution depending on the needs». In addition, public organizations note that there may be problems with monitoring loans. Despite the fact that the state has created an electronic resource for recording loans received, the information on it may become outdated, and its volume may differ significantly depending on the lender and other factors



# TAJIKISTAN

In the Republic of Tajikistan, 11 projects that the country received to combat the pandemic in 2020 were selected for research and evaluation. According to the results, the public assessment of international financial assistance in the country amounted to 20 points out of 100. Of the five countries studied, the assessment of Tajikistan is the lowest.

Chart 4. Assessment of international financial assistance by criteria

Criterion	Targeted loans	Grant aid	General loans
Openness of the information	25	20	50
Completeness of the information	31	29	44
Publicity of reporting	4	20	17
Transparency	0	8	0
Public participation	0	12	0
Accountability for spending	0	14	9

The chart shows that non-repayable aid projects most of all meet the evaluation criteria. The most problematic indicators were transparency, public participation, and accountability of spending, especially for loans.

There are no electronic resources or databases in the state that would contain information about international financial assistance projects. The procedures for selecting contractors are unknown, and monitoring of the implementation of projects or their financing is not available. In terms of public participation, even passive forms are not practiced, such as informing citizens about government decisions or the implementation of international financial assistance projects.

In terms of accountability of resources, only one of the 11 projects has access to information on how funds are spent, it is possible to get acquainted with procurement plans, procedures, and contracts. At the same time, the information is aggregated independently by the lender and is located on the World Bank portal. Thus, despite the presence of scores in the assessment of expenditure accountability, these indicators are not provided by the state. There is also no public reporting on the implementation of projects or the use of international financial assistance resources.

In general, in most cases, basic information about attracting international financial assistance is available to the public in Tajikistan. In open access, you can study agreements with international financial organizations, and get acquainted with the general goals of projects, and the amounts of loans and grants. Most often, for this, you need to use the information resources of creditors.

The partner NGO of Tajikistan, assessing the level of access of the population to information about the IFA, notes the following:

”

on the website of the Ministry of Finance of the Republic of Tajikistan, today there is no separate online platform for posting information about concluded agreements, projects/programs and the results of their implementation. Information about agreements to attract IFA is published separately on the websites of the Parliament, ministries, and departments of the country, and the completeness of the information provided is only 20%



# UKRAINE

In Ukraine, 12 projects of international financial assistance were the subject of analysis and evaluation, including two types of loans and gratuitous assistance. The overall score was 52.5 points out of 100 possible.

*Chart 5. Assessment of international financial assistance by criteria*

<i>Criterion</i>	<i>Targeted loans</i>	<i>Grant aid</i>	<i>General loans</i>
Openness of information	66	50	50
Completeness of information	85	66	67
Publicity of reporting	87	37	31
Transparency	45	10	30
Public participation	25	17	20
Accountability for spending	46	40	57

Of the three types of international financial assistance, directed loans received the highest score. Aspects of openness of information, completeness, and publicity are disclosed in general, thanks to the functioning of a specialized electronic portal in the state. The Ministry of Finance publishes basic information about received targeted loans in the public domain, and there you can also find some reporting documents on financing and implementation progress. Information on grants and general loans is more scattered, there is no single data repository, it is difficult to assess the effectiveness of these projects.

The indicators of public participation are also low. Several purpose-built loans noted that project-related issues were brought to public consultation. In other cases, public participation was limited to informing the population about the progress of the projects.

In terms of expenditure accountability, an above-average score was assigned to general loans, which is due to the rules for the functioning of the budget system in the state and generally accepted principles of public procurement. All purchases that are made in the state at the expense of budget money (including credits that fell into the general fund of the budget) are carried out through the open electronic system ProZorro. With regard to non-refundable assistance and targeted loans, the general provisions for procurement are more often known, there are publicized plans, but information about the procedures or contracts themselves is closed to the public.

Summing up the assessment of IFA projects in Ukraine, we noted the lack of the desired level of transparency and accountability in the issue of its use. At the same time, a number of steps were taken by the state in the direction of systematization and disclosure of data on targeted loans received by Ukraine. General loans and grants in the direction of transparency of use are practically not moving today. Although individual documents, statements, or data can be found in the public domain, there is no simple and understandable system for tracking the IFA for the public.

The concept of public self-assessment has become an applied tool for determining the transparency and accountability of international financial assistance from the perspective of society. The six established criteria make it possible to identify the most problematic aspects of attracting and using IFA in states. After analyzing 37 loans and grant projects from 5 countries of the EECA region, we came to the following conclusions:

1. Attracting and spending funds from international financial assistance in all the countries under study, to one degree or another, are processes that are closed to the population. There is no unified approach to communication of issues related to the IFA for citizens.
2. A large amount of information on external loans is available for review in the public domain. At the same time, the information is fragmented, not published systematically, and to a large extent demonstrates the basic characteristics of the IFA: cost, creditor, purpose, and term. Issues of using international financial assistance are disclosed on a situational basis, more often through the channels of creditors through the publication of contracts, progress reports, information on procurement, tranches, etc. For example, during the study, a lot of information was obtained thanks to the electronic resource of the World Bank, which contains information about all its projects. In turn, states do not independently maintain similar resources that would enable the population to get acquainted with the full picture of spending external loans and non-repayable aid, as well as their effectiveness.
3. For all five countries, the portrait of IFA, according to the civic assessment, is partially similar: the level of openness and completeness of information about projects that are attracted to countries is above average. Data is not collected in one place, although the basic information is scattered, it is open. Public participation has the worst performance among all established criteria. The population of states is not systematically involved in resolving issues of attracting or distributing external loans and gratuitous assistance. There were only three cases of discussion of IFA issues with the population, one each in Moldova, Kyrgyzstan, and Ukraine. The lion's share of activities in the direction of communication with society is informative in nature, not involving the active involvement of citizens in the processes. In addition, informing more often also has a non-systemic character. There are no electronic tools that ensure transparency in the processes of attracting and using IFA funds as a comprehensive solution.
4. Almost all the countries studied have digital solutions at their disposal related to the accountability aspect of the use of budget money, but none of them fully covers the issue of attracting and using the IFA. In Moldova, there is a resource that contains data on attracted general loans and targeted loans, but information on the implementation of projects is not aggregated. In Ukraine, a similar portal presents data on directed loans only. Kyrgyzstan has separate resources for demonstrating the volume of humanitarian assistance and distributing donations to fight the pandemic. In Kazakhstan and Tajikistan, there are no electronic tools that reflect the attraction or expenditure of funds from the IFA, or local NGOs do not know anything about them.
5. Indicators of public reporting and accountability of expenditures in countries differ, which is associated with the share of certain types of IFA in the volume of projects under study. Thus, in relation to targeted loans, it is more often possible to get acquainted with reports on financing or the progress of projects. While expenditure accountability is more difficult to establish due to closed procurement procedures and lack of information on project audits. General loans, in turn, are less likely to be accompanied by reports on their performance, which is associated with obtaining such loans. Spending accountability in the case of general loans is higher for those countries where the procedures for using public money are generally fairly open to the public.

Based on the results of the study and consultations with NGOs that specialize in monitoring the use of budgetary (loan) funds, we have developed 3 general proposals for the countries under study:

1. The topic of international financial assistance needs to be communicated. The funds that the state borrows or receives through partnership agreements in the form of chart assistance are attracted exclusively for the benefit of the people. Citizens have the right to understand what policy the state is pursuing in this direction, why external assistance is attracted, and how it is spent. The issue of loans requires special attention since the return of debts will directly or indirectly affect the entire working population.

Solution: development of a specialized electronic resource with free access and systematic updating of information by the responsible state authority. The Ukrainian portal, <https://proifi.gov.ua/>, supplemented by data on general loans and grants, as well as a separate information section for citizens on IFA procedures and policies in general.

2. Public participation in the issues of attracting and using international financial assistance should become an integral part of government policy. Citizens' methods and degrees of involvement in such activities should be planned individually for each state, based on the specifics of relations between the state and civil society. At the same time, the population must have at its disposal a legitimate way of expressing their opinion regarding the policy of the state in matters of attracting the IFA.

Solution: The mechanism of public discussions, which exists in one form or another in each of the studied states, can be used as the best way for public participation in the issues of the IFA. A precedent that can be taken as a basis is noted in Moldova – the submission for public discussion of a draft loan agreement between the republic and CEB. The practice of public discussions may be regulated by law and used only for IFA projects that involve a government loan or may be dependent on the amount of the loan.

3. Governments, in partnership with international financial organizations, need to develop a common position regarding the policy of accountability of the costs of the resources received from the citizens of the state. Since the biggest problem in this aspect is related to procurement under targeted loans and non-repayable aid projects, it is proposed to develop and agree on the basic characteristics of procurement made at the expense of the IFA and subject to disclosure on a mandatory basis.

Solution: the creation of a state repository of data on procurement carried out within the framework of IFA projects and publication of basic information about them: procurement plan, participants, and information about the contract. The World Bank resource <https://projects.worldbank.org/en/projects-operations/project-procurement/P167790>, which collects information on procurement within its projects, can be taken as a prototype. At the same time, in order to use a similar portal in states, it is necessary to reach agreements with all lenders on the disclosure of data, resolve the issue of the frequency of updating information and ensure that purchases are published regardless of the IFA project under which they are made. For countries such as Ukraine, Moldova, Kazakhstan, and Kyrgyzstan, an alternative could be advocacy for the use of national e-procurement systems for the purchase of goods, works, and services not only for budgetary money but also for IFA resources. Now, this practice is partially used by the World Bank in some states (for example, in Ukraine), when the amount of purchases is «before the threshold» according to their policies.

