



External Evaluation Report on the Public Administration Reform Strategy 2022–2026 and the accompanying Action Plans for the periods 2022– 2024 and 2025–2026



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ABBREVIATIONS

AZLP	Agency for Personal Data Protection and Free Access to Information
CAF	Common Assessment Framework
CPR	Central Personnel Record
SAI	State Audit Institution
eDMS	Electronic Document Management System
EC	European Commission
EU	European Union
GSG	General Secretariat of the Government
IBM-BPM Platform	Business Process Digitalisation/Automation Platform
IPA III	Instrument for Pre-accession Assistance
ISPI	Reporting on Medium-Term Work Programmes of Ministries
LSU	Local Self-Government Unit
JSERP	Single Information System for Electronic Data Exchange
LS	Local Self-Government
MPA	Ministry of Public Administration
NGO	Non-Governmental Organizations
OECD	Organisation for Economic Co-operation and Development
ReSPA	Regional School of Public Administration
RIA	Regulatory Impact Assessment
PAR	Public Administration Reform
SBS	Sector Budget Support
SIGMA	Support for Improvement in Governance and Management
FAI	Free Access to Information
UN	United Nations
UNDP	United Nations Development Programme
X - Road Platforma	Secure Data Integration System

EXECUTIVE SUMMARY

The Ministry of Public Administration (MPA) expressed the need for an evaluation of the Public Administration Reform Strategy 2022–2026 and the accompanying Action Plans for the periods 2022–2024 and 2025–2026, specifically to assess the achievements, results, and impacts realized so far. The Regional School of Public Administration (ReSPA) supported this independent evaluation process of implemented activities, achievements, results, and impacts by engaging an external expert and providing technical and organizational assistance.

The purpose of the external evaluation of the Public Administration Reform Strategy 2022–2026 and the accompanying Action Plans for 2022–2024 and 2025–2026 was to assess whether, to what extent, and how effectively the public administration reform in Montenegro—as designed in these strategic documents—responded to the needs of citizens, the non-governmental sector, business entities, the academic and research community, other stakeholders, and the public administration itself. Furthermore, it aimed to determine the extent of its coherence with other public policies and reforms, whether the desired impacts were achieved, and its potential sustainability in the upcoming period.

This report presents the findings of the external evaluation of the Public Administration Reform Strategy 2022–2026 and the accompanying Action Plans for 2022–2024 and 2025–2026. It includes assessment conclusions regarding the relevance, coherence, effectiveness, efficiency, impact, and sustainability of the Public Administration Reform Strategy and its Action Plans, alongside recommendations for the next planning period. The report contains an assessment of progress made to date, identifies key challenges and risks in implementing public administration reform in Montenegro, and provides evidence-based recommendations for corrective measures during the remaining implementation period of the Strategy and the current Action Plan until the end of 2026. Additionally, it offers recommendations for the next planning cycle to serve as a baseline for preparing the subsequent Strategy and Action Plan.

The external evaluation is based on the analysis of strategic documents, implementation reports, and international reports on public administration reform in Montenegro. This was complemented by qualitative findings gathered during focus groups with representatives of institutions responsible for Action Plan activities, interviews with representatives of the Ministry of Public Administration and the Support for Improvement in Governance and Management (SIGMA) initiative, as well as responses from a questionnaire distributed to relevant institutions following the focus groups. Given that this evaluation is being conducted during the validity of the Strategy and the ongoing Action Plan, it was possible to determine the progress achieved so far in the form of emerging results and outcomes, as well as implementation challenges and risks to achieving operational and strategic objectives. However, it was not possible to determine

the final impacts of the reform, which are not yet fully visible. This is due to the fact that the ultimate impacts of a reform can only be identified and evaluated after a certain period has elapsed following the implementation of planned activities within the current Action Plan.

Public administration reform (PAR), along with the Public Administration Reform Strategy 2022–2026 and the current Action Plan 2025–2026, remains highly relevant and necessary for the upcoming period. The Strategy and its accompanying Action Plans are overarching strategic documents whose vision is a professional public administration that delivers high-quality services and possesses adequate capacities for full membership in the European Union (EU). They directly respond to the key needs of citizens, the private and non-governmental sectors, as well as the public administration itself, for improving the quality and accessibility of public services, and enhancing the modernisation and efficiency of public administration. Furthermore, the Strategy and the accompanying Action Plan have the potential to address Montenegro's identified challenges in public administration reform, such as: the organisation and operation of public administration, service delivery, professionalisation of public administration, transparency and openness of public administration, and the improvement of the policy planning process, while simultaneously supporting alignment with the EU *acquis*. The reform integrates sectoral priorities into a single, coherent framework and retains its strategic importance even after the completion of the current planning cycle/period, given the continuous need for modernisation, digitalisation, and the strengthening of public administration. At the same time, it is commendable that the public administration reform in Montenegro has significantly included the local level, as a large number of activities are being implemented locally. This confirms that public administration reform is equally relevant for the local level, and that municipalities are both significant contributors to and beneficiaries of a successful public administration reform, without which complete results cannot be achieved.

The coherence of the public administration reform, the Strategy, and the Action Plans has been achieved. The evaluation concludes that adequate links have been established with key reforms in Montenegro that are directly connected to public administration reform. Specifically, coherence has been achieved with the public financial management reform through the alignment of the Public Administration Reform Strategy and its accompanying Action Plans with the Public Financial Management Reform Programme 2022–2026 and its Action Plan, as well as with the strategic approach to digitalisation through alignment with the Digital Transformation Strategy of Montenegro 2022–2026. Public administration reform is also coherent with Montenegro's European integration process and its efforts to become a full member of the EU.

The overall effectiveness of the reform has been assessed as partial, primarily due to the fact that most activities are still ongoing and their completion is planned and expected by the end of 2026. Tangible results have already been achieved in certain areas, such as:

an increased number of digitalised services alongside the widespread implementation of the Single Information System for Electronic Data Exchange (JSERP platform), the introduction of quality management standards in institutions, high methodological alignment of strategic documents and the establishment of the practice of evaluating these documents, raising internal operational efficiency through the introduction of electronic document management systems (eDMS), reducing municipal debt, as well as strengthening the legal validity of the decisions of the Agency for Personal Data Protection and Free Access to Information (AZLP) due to a decrease in the number of decisions overturned by the Administrative Court. However, progress was limited by political instability and government turnovers, which led to an increased number of ministries, public administration reorganisation, high staff turnover, and consequently, stagnation and reduced capacities in certain areas. All of this, combined with delays in adopting systemic laws and the slowing down of information systems development due to cyberattacks, affected the public administration's capability to fully implement the reform within the ambitiously set deadlines. A full impact assessment will only be possible some time after the expiration of the period covered by the Strategy and the current Action Plan (usually 3–5 years after the completion of planned activities). A prerequisite for the full effectiveness of public administration reform, which has been met in Montenegro, is the already proven efficiency and operational functionality in the performance of the current Government over the past period.

The efficiency of the Strategy and Action Plans implementation to date has been assessed as partial. On one hand, the most efficiently implemented activities were those relating to the implementation of e-services via the Business Process Digitalisation/Automation Platform (IBM-BPM platform), the implementation of the X-Road system for secure data integration, the establishment of electronic data exchange via the SISEDE platform, and the introduction of quality management systems in state authorities. This also includes activities establishing prerequisites for a stronger evidence-based planning system, raising institutional capacities to conduct regulatory impact assessments (RIA), improving the eDMS and its linkage with eGovernment, as well as intensive professional development of the staff of the AZLP, alongside the development of a new open data portal featuring high-value datasets. However, delays occurred in the execution of key activities related to public administration functionality analyses, the establishment of merit-based reward and promotion systems, the full utilization of the Human Resources Information System, and the adoption of various laws (on the Government, public institutions, local self-government, internal controls in the public sector, etc.). Delays were also noted in drafting methodologies for the development of state administration bodies' work programmes and work reporting, as well as in the digitalisation of the AZLP and the establishment of the Council for Free Access to Information. These delays reduced the overall implementation efficiency of the Strategy and Action Plans, resulting from government turnovers, shifting priorities,

institutional reorganisations, a lack of professional capacities, the aftermath of cyberattacks, and ambitiously set deadlines. Although data on actual costs at the level of individual activities remain limited, significant efficiency gains are visible in the optimization of paperless administrative processes, a higher level of automated *ex officio* data exchange, and strides toward the financial stabilization of municipalities due to enhanced supervision over the financial operations of local self-governments. Coordination, monitoring, and reporting mechanisms within the public administration reform have been assessed as partially efficient, mainly due to reliance on institutions outside the Ministry of Public Administration, and because an optimal coordination, monitoring, and reporting model has yet to be found—one that would ensure the availability of data on all indicator values during regular annual reporting by the end of the first quarter of the current year for the previous year.

The impacts of the public administration reform are not easily determined at a stage where the majority of activities from the Strategy and the current Action Plan are still ongoing. However, certain impacts are beginning to emerge, primarily in terms of facilitating communication between the public administration and citizens, business entities, the non-governmental sector, and other stakeholders, achieved through opening up the public administration and increasing the accessibility and quality of public services, including digitalisation.

The reform can be sustainable provided that continuous political, professional, technical, and institutional support is ensured, alongside adequate IT, financial, and human resources, as well as a completed legislative framework. Many reform activities have already been integrated into regular administrative processes, but long-term sustainability depends on the adoption of the remaining planned regulations, full functionality and maintenance of information systems, and the provision of sufficient capacities for further implementation, coordination, monitoring, and reporting of reform activities. Timely implementation of activities and their better linkage with operational objectives, stronger communication, greater visibility of achieved results and outcomes, as well as strengthening public trust, represent key prerequisites for success. The most significant risks include staff turnover, resistance to change, limited funds for the maintenance of information systems, and limited, uneven capacities, particularly at the local level.

Based on the findings of the external evaluation and the conclusions regarding relevance, coherence, effectiveness, efficiency, impact, and sustainability, a set of recommendations has been formulated for the period until the expiration of the Strategy and the current Action Plan, as well as for the new Public Administration Reform Strategy and the accompanying Action Plan for the period from 2027 onwards.

The key recommendation arising from the evaluation findings and conclusions for the period until the expiration of the Strategy and the existing Action Plan is to immediately

elevate the importance of implementing planned activities and achieving the targets and planned indicator values by the end of 2026. This should include constantly reminding and obligating the operational level to execute the planned activities to the greatest extent possible.

Bearing in mind that the Public Administration Reform Strategy 2022–2026 and the existing Action Plan expire at the end of 2026, that the implementation rate of the Action Plan at the end of 2025 stood at 32% (leaving more than two-thirds of the activities to be implemented in 2026), the importance of public administration reform in the European integration process, as well as the upcoming elections and the constitution of a new Government in 2027, the evaluation process highlighted the need to consider several options regarding the future approach to public administration reform in Montenegro. These options include: a) Status Quo or the "do nothing/no intervention" option; b) Drafting a new Strategy and accompanying Action Plan and their adoption in early 2027; c) Extending the validity of the existing Strategy and Action Plan until the end of 2027, without significant changes to the documents themselves except for extending the deadlines for activities that will not be completed by the end of 2026, accompanied by the preparation of a dynamic plan for drafting the new Strategy and Action Plan; and d) Extending the validity of the Strategy and Action Plan until the end of 2027 while improving the quality of these strategic documents by redefining indicators at the level of operational objectives, activities, and outcome indicators so that the implemented activities and their results contribute even more to the achievement of operational and, consequently, strategic goals, alongside the preparation of a dynamic plan for drafting the new Strategy and Action Plan.

The analysis and comparison of these options showed that the second and fourth options—namely, the option of drafting and adopting a new Strategy and Action Plan in early 2027, and the option of extending the current Strategy and Action Plan until the end of 2027 with qualitative improvements—are the highest-ranked options. However, the Government of Montenegro will need to decide as soon as possible which option to adopt for the continuation of the public administration reform. The identification of options, their analysis, and the comparative findings presented in this report provide the analytical baseline for the upcoming discussion on the approach to continuing the public administration reform, without prejudicing the future decision of the Government of Montenegro regarding the next steps. In any case, the decision of the Government of Montenegro must be based on:

- A thorough analysis of existing capacities for implementing public administration reform, as well as required and missing capacities, in order to find ways to secure them as soon as possible; and
- Finding an optimal coordination structure that would enable an equally important involvement of higher-level decision-makers, as well as the continuous

engagement of operational levels in implementing the public administration reform, monitoring implementation, and reporting on achievements.

The key recommendations for establishing an even better methodological framework during the drafting of the new Strategy and accompanying Action Plans, once the decision on their preparation has been made, are presented below:

- Determining key impact indicators at the level of strategic objectives (identifying available impact indicators or designing new ones) in order to enable monitoring of the degree of achievement of these objectives—specifically, the effect of implementing the Strategy and accompanying Action Plans on the public administration itself and stakeholders (citizens, businesses, the non-governmental sector, etc.);
- Reducing the number of outcome indicators at the level of operational objectives for more efficient monitoring of implementation and reporting on achievements, ensuring that regular annual reporting on these indicators can be secured within the first quarter of the current year for the previous year;
- Defining activities to be implemented in a way that makes them highly relevant to achieving the objectives (in other words, establishing a stronger link between activities and goals), setting more realistic deadlines for the execution of these activities, and formulating high-quality accompanying output indicators that fully enable tracking activity implementation;
- Developing precise indicator passports for impact indicators at the strategic objective level and outcome indicators at the operational objective level, and ensuring their regular use by institutions involved in the implementation of the Strategy, accompanying Action Plans, and progress reporting, with the aim of ensuring accurate and timely monitoring and reporting.

All areas covered by the public administration reform (the five strategic objectives) require continuous monitoring and improvement, even after EU accession. Public administration reform is never fully completed; it represents a process of continuous improvement and evolution to establish a system capable of absorbing external shocks (political changes, crises, shifts in donor support) through timely responses, and ensuring that Montenegro is prepared for all the responsibilities that come with EU membership.

1. Evaluation Purpose, Criteria, and Evaluation Questions

The purpose of the external evaluation of the Public Administration Reform Strategy 2022–2026 and the accompanying Action Plans for the periods 2022–2024 and 2025–2026 was to assess the extent to which the public administration reform responded to the needs of citizens, businesses, the non-governmental sector, the academic community, other stakeholders, and the public administration itself. Specifically, it looked at the demand for an efficient and transparent public administration that delivers high-quality and accessible public services based on process digitalisation, possesses professional, well-trained, and motivated staff, and designs evidence-based policies through an inclusive process. Furthermore, the evaluation examined the degree of alignment between the public administration reform and other public policies and reform processes, whether the planned results, outcomes, and impacts were achieved in line with the projected deadlines and planned and available resources, and whether the achieved effects are sustainable in the upcoming period.

In other words, the objective of the evaluation was to assess the relevance, coherence, effectiveness, efficiency, impact, and sustainability of the public administration reform itself, as well as the Strategy and Action Plans through which the reform is implemented. These constituted the evaluation criteria against which progress to date was assessed and key challenges and risks in implementing the public administration reform were identified. Based on the evaluation findings and conclusions, recommendations were prepared for the remaining implementation period of the Strategy and the current Action Plan (until the end of 2026), as well as for the subsequent planning cycle.

The evaluation provided an independent and objective assessment of the public administration reform results achieved so far and, at the same time, serves as a baseline for the preparation of the future strategic framework for public administration reform post-2026. In this regard, a particular focus of the evaluation was on the achievement of planned output, outcome, and early impact indicators, ensuring that future activities and public administration reform priorities are evidence-based and built upon the experiences gained during the implementation of the existing strategic framework.

In accordance with the national evaluation methodology defined in the Manual for the Evaluation of Strategic Documents¹, the evaluation focused on the following key evaluation questions:

1. To what extent do the Public Administration Reform Strategy and the current Action Plan remain relevant to the needs of stakeholders and challenges in the

¹ <https://www.gov.me/dokumenta/54336d53-335b-4811-91aa-7298bcacc991>

field of public administration reform in Montenegro, the institutional context, and the priorities of the EU accession process in the upcoming period?

2. To what extent are the Strategy and the accompanying Action Plans coherent with other reforms and strategic documents (including the Public Financial Management Reform Programme 2022–2026², the Digital Transformation Strategy 2022–2026³, Montenegro Accession Programme to the EU 2026–2027⁴, the Economic Reform Programme of Montenegro 2026–2028⁵, the Reform Agenda of Montenegro 2024–2027⁶, the National Strategy for Sustainable Development 2030⁷, the Cyber Security Strategy 2022–2026⁸, the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022–2026⁹, etc.)?
3. What progress has been made in implementing the planned activities, operational and strategic objectives, and what early results, outcomes, and impacts can be identified?
4. How effective are the institutional arrangements, coordination, monitoring, and reporting mechanisms, and the sequencing of reforms in supporting the implementation of the Strategy and Action Plan?
5. To what extent have the available resources been used efficiently, taking into account available data and implementation constraints?
6. What risks, interdependencies, and conditions could affect the sustainability of the reform's results, outcomes, and impacts until the end of the validity period of the Strategy and the current Action Plan?

2. Basic Information on the Strategic Documents Subject to Evaluation

The subject of the evaluation is the Public Administration Reform Strategy 2022 – 2026 (the Strategy)¹⁰, along with the first three-year Action Plan for the period 2022–2024 (AP 2022–2024) and the current Action Plan for the two-year period 2025–2026 (AP 2025–2026). The competent Ministry of Public Administration (MPA), in cooperation with the

² <https://www.gov.me/clanak/azurirani-program-reforme-upravljanja-javnim-finansijama-2022-2026>

³ <https://www.gov.me/dokumenta/0c802520-e016-41ee-a6e4-7af6eb66e19d>

⁴ <https://www.gov.me/dokumenta/e7a3bc57-b3bc-4e81-b1f2-58d9026a57f6>

⁵ <https://wapi.gov.me/download-preview/e4993578-0a25-4634-9c07-668aa53e715d?version=1.0>

⁶ <https://www.eu.me/wp-content/uploads/2026/04/Reformska-agenda-Crne-Gore-finalna.pdf>

⁷ <https://www.gov.me/dokumenta/67dc487e-097d-41d2-8fd5-7827a19a1f5a>

⁸ <https://wapi.gov.me/download-preview/85e2a9d0-0d3c-483a-9822-515d3b7798de?version=1.0>

⁹ <https://wapi.gov.me/download-preview/b614923d-c855-4ff5-9bcb-5786b4227159?version=1.0>

¹⁰ <https://www.gov.me/dokumenta/823842f4-2ffd-4a0d-936e-c1b00c669115>

Coordination Team, drafted the current Action Plan 2025–2026 along with the Report on the Implementation of the Action Plan 2022–2024 for the year 2024¹¹.

The Strategy and the accompanying Action Plans belong to the public administration reform sector and represent the overarching strategic documents in this area. The Strategy and the accompanying Action Plans contribute to the creation of an accountable, efficient, transparent, and optimal public administration that will enable high-quality services for citizens and contribute to economic stability and the competitiveness of the economy, thereby ensuring the fulfilment of EU membership requirements. As one of the three fundamental pillars of the enlargement process, public administration reform is inextricably linked with the rule of law and economic reforms, ensuring the institutional stability necessary for the effective assumption of EU membership obligations. The sectoral public administration reform policy is implemented through horizontal synergy with the Public Financial Management Reform Programme and the Digital Transformation Strategy, which links administrative changes with fiscal sustainability and data-driven modernisation of services. In addition to the above, the Public Administration Reform Strategy pays close attention to inclusiveness, gender equality, and depoliticisation, following the SIGMA Principles of Public Administration as a roadmap toward the European Administrative Space.

The core problem that the Strategy and its accompanying Action Plans sought to resolve is the inefficiency of public administration due to a lack of control, accountability, and oversight mechanisms at the central and local levels. This includes inadequate human resources management, insufficient use of modern technologies in public service delivery, a lack of transparency and openness of public administration toward citizens, the private, and non-governmental sectors, and the absence of a direct link between policy planning and the programme budget.

The key objective of the Strategy is the collective building of an accountable, efficient, and transparent public administration focused on the needs of citizens and the economy. The Strategy is directed toward creating an efficient and service-oriented public administration, characterized by increasing citizens' trust in its work through a simple, accessible, and user-friendly experience in all public services. It also focuses on professional, accountable, and efficient public administration operations, openness and accessibility of all data in the work of public institutions, and high-quality participation in drafting laws and public policies based on facts and data.

¹¹ Report on the Implementation of the Action Plan 2022–2024 of the Public Administration Reform Strategy 2022–2026 for the Year 2024, alongside the Action Plan 2025–2026 for the Implementation of the Public Administration Reform Strategy 2022–2026
<https://wapi.gov.me/download-preview/6e85b99d-cba5-4c72-aa02-195b2c849fca?version=1.0>

In line with the vision, the Strategy is intended to contribute in the long term to creating a professional public administration that delivers high-quality services to end-users and possesses adequate capacities for EU accession.

The pathway to change is defined through a logical framework matrix that encompasses the following elements of the Strategy and Action Plans:

- 5 strategic objectives: Organisation and operation of public administration in the function of citizens' needs; Citizens and businesses use high-quality public administration services; Professional public administration; Transparent and open public administration; Policy planning with citizens and for citizens;
- 14 operational objectives and indicators at the operational objective level (outcome indicators) with baseline values and targets for 2024 and 2026;
- A series of activities to achieve the defined goals and indicators at the activity level (output indicators);
- Responsible institutions, implementation periods (start and end dates) for activities, estimated financial resources for implementation, sources of funding, and links to relevant documents.

The process of achieving change was based on several key mechanisms:

- Establishment of standards at all levels, ranging from accountability and oversight standards, through quality standards in service delivery and quality management of institutional functioning, to human resources management standards, transparency and openness standards, and policy creation and monitoring standards;
- Digitalisation, through the introduction of systems such as eDMS for paperless administration, the expansion of the JSERP platform for *ex officio* data exchange, the linkage of registries, and the development of electronic services;
- Regulatory development, through the drafting and adoption of systemic laws (such as the Law on the Government, the Law on Public Institutions, the Law on Free Access to Information, etc.) with the aim of creating a sustainable legal foundation for accountability, transparency, and institutional coordination;
- Inclusiveness and participation, namely the active involvement of civil society, the academic community, and business entities in the decision-making and rule-making processes via the eParticipation portal, as well as through consultation processes and public hearings.

The fulfilment of the following conditions was essential for the successful implementation of the reform:

- An efficient coordination structure, through continuous oversight and guidance from the political level via the Public Administration Reform Council, accompanied by operational support from the Coordination Team that monitors activity implementation;
- Financial and fiscal sustainability, as the achievement of objectives is conditional upon securing funds from the national budget and significant EU support;
- Human resources capacity and political will, with the aim of depoliticising and professionalising staff alongside continuous skills development, as well as sustained political support to ensure that activity implementation is prioritized and efficient in order to meet the set goals;
- Alignment with international standards, through the consistent application of the OECD/SIGMA Principles of Public Administration as a necessary framework and roadmap toward the European Administrative Space;
- Greater availability of high-quality and timely data for creating sustainable public policies and ensuring the measurability of reform results;
- Human, material-technical, and IT capacities with the aim of creating a modern, service-oriented public administration, achieved through the legacy ICT infrastructure modernisation, the development of interoperable systems for secure data exchange, and the attraction and retention of expert staff in short supply.

The Public Administration Reform Strategy is being implemented within the timeframe from 2022 to 2026. The Government of Montenegro adopted this overarching strategic document in December 2021. The operationalisation of the Strategy was planned through two successive action plans. The first three-year Action Plan covered the period from 2022 to 2024, while the second two-year plan was developed for the remaining period of 2025–2026.

The implementation of reforms took place within a highly specific and dynamic political context, marked by the reorganisation of the Government on two occasions and a significant increase in the number of ministries. This substantially affected the overall organisation of public administration, staff turnover, reduced institutional capacities, and shifting priorities, which led to a slowdown in the implementation dynamics of planned reform activities. In addition to political factors, implementation was significantly impacted by a hybrid cyberattack on the Government's IT infrastructure in August 2022, which halted digital processes for several months and caused the loss of some documents in progress.

Funding for the Strategy and the accompanying Action Plans has been secured from the budgets of the institutions leading the reform objectives, as well as from

international donor funds. The most active donors in the field of public administration reform in Montenegro so far have been the United Nations Development Programme, the EU, SIGMA, the Center of Excellence in Finance, the World Bank, and the Government of the Kingdom of Norway. Within the Strategy and the implementation reports for 2024 and 2025, it is stated that the initially estimated costs for the execution of activities under the first three-year Action Plan amounted to EUR 11,967,330, out of which EUR 4,408,595 was spent, representing nearly 37% of the total planned budget for implementing activities in the specified three-year period. For the second, current, two-year Action Plan, the total planned funds amounted to EUR 3,996,700, of which EUR 1,132,334 was spent in 2025, making up just over 28% of the total planned funds for implementing activities in this two-year period.

The main coordinator of the reform is the Ministry of Public Administration. The Public Administration Reform Council performs oversight and provides guidance from the political level. Among the most prominent partner institutions responsible for implementing the planned activities are the General Secretariat of the Government (GSG), the Ministry of Finance, the Human Resources Management Authority, and the AZLP, with the active participation of local self-government units through the Union of Municipalities of Montenegro. From the international level, organisations such as OECD/SIGMA, ReSPA, and the World Bank have provided expert support and guidelines for alignment with European administrative standards. The Strategy has also enabled the active participation of civil society, the academic community, and trade unions, who are directly involved in the work of working groups and the monitoring of reform results.

Participation of Non-Governmental Organisations and Trade Unions in Public Administration Reform

The preparation of the Public Administration Reform Strategy 2022–2026 and its accompanying action plans was conducted in an inclusive manner, involving a wide scope of consultations which, in addition to state authorities and local self-governments, included non-governmental organisations (NGOs), trade unions, and the academic community. This process encompassed workshops and focus groups held throughout 2021 during the preparation of the Public Administration Reform Strategy and the Action Plan 2022–2024, while a dedicated working group for drafting the Action Plan 2025–2026 was formed in November 2024, whose membership also included civil society representatives. Regarding coordination and monitoring, NGOs are directly involved in the work of the Public Administration Reform Council through two representatives.

The participation of the NGO sector is essential for the achievement of Strategic Objective IV, which strives for a transparent and open administration through better access to information, as well as for Strategic Objective V, which focuses on policy planning with citizens, ensuring greater legitimacy and quality of public policies. In these areas, NGOs help strengthen public trust and ensure that regulations and services are tailored to the actual needs of users. To ensure the financial sustainability of reform activities and greater stakeholder involvement, the Ministry implemented public calls for funding NGO projects ("Together Through Reform" and "Public Administration Accessible to All"), for which over EUR 345,000 was allocated during 2022 and 2023. The Ministry of Public Administration regularly prepares, and the Government adopts, the Report on the Application of the Regulation on the Selection of Representatives of Non-Governmental Organisations to Working Bodies of State Administration Organs, which tracks the level of NGO involvement in the preparation of laws and strategies. These reports are continuously improved through the introduction of statistical data, information on participant satisfaction within working groups, and, as of 2024, through gender equality analysis within consultation processes. In addition to NGOs, trade unions are also recognized as key partners whose participation ensures greater legitimacy of the reforms. Their influence on regulatory solutions was confirmed during the public hearing on the Law on Local Self-Government, when the Trade Union of Administration and Justice, in cooperation with municipalities and the Union of Municipalities, submitted a proposal to regulate the civil service system at the local level through a separate law. This was accepted by the Ministry of Public Administration, which subsequently commenced work on the Law on Local Civil Servants and State Employees. Within the stakeholder analysis, trade union organisations have been identified as entities with high interest and influence under Strategic Objective I (Organisation and Operation of Public Administration) and Strategic Objective III (Professional Public Administration), highlighting the acute need for strengthened cooperation to ensure an efficient administration tailored to citizens' needs. Regarding the salary system, reports indicate that numerous collective agreements signed by trade unions have led to inconsistencies within the system, which is planned to be addressed through the new Law on Salaries in the Public Sector to ensure equity and fiscal sustainability.

3. Methods and Limitations

The external evaluation of the Public Administration Reform Strategy and the accompanying Action Plans followed the rules established by the relevant regulations and methodological framework in Montenegro. First and foremost, it should be noted that the Decree on the Manner and Procedure of Drafting, Aligning, and Monitoring the Implementation of Strategic Documents¹² and the Methodology for Policy Development, Drafting, and Monitoring the Implementation of Strategic Documents¹³ established the legal basis for the evaluation of strategic documents within Montenegro's planning system. Furthermore, the external evaluation was conducted in accordance with the methodological framework provided in the Manual for the Evaluation of Strategic Documents¹⁴, as well as with EU, OECD, and SIGMA standards, and relevant regional best practices.

The approach utilized during the evaluation process was a mixed and formative evaluation. In accordance with the Manual for the Evaluation of Strategic Documents, a mixed evaluation implies that it is conducted by both external and internal evaluators, enabling an objective evaluation approach while respecting the principles of economy and rational planning, taking into account the level of human, organizational, financial, and material resources available for strategic planning and evaluation. Pursuant to the same manual, the formative evaluation is focused on assessing the progress achieved, risks, and the overall direction of the reform, rather than rendering definitive conclusions on the ultimate impacts (effectiveness) and sustainability of the reform, given that half a year remains until the expiration of the Strategy and the current Action Plan. Nevertheless, this formative evaluation provided essential information on required improvements in the implementation of the analyzed strategic documents, as well as on enhancing the elements and structure of the strategic document itself.

The Ministry of Public Administration, as the competent institution and the author of the Strategy and accompanying Action Plans, acted as the manager of the evaluation process in line with its role, and assumed responsibility for the overall management and coordination of the evaluation process. As the author and coordinator of the implementation, monitoring, and progress reporting of the Strategy and its accompanying Action Plans, the Ministry of Public Administration ensured that the

¹² Decree on the Method and Procedure for Drafting, Harmonising, and Monitoring the Implementation of Strategic Documents, 2018, <https://www.gov.me/dokumenta/23c216b2-3eb7-453c-b0a7-3cd9e9e9742e>

¹³ Methodology for Policy Development, Drafting, and Implementation Monitoring of Strategic Documents (implemented by the General Secretariat of the Government of Montenegro), 2023, <https://www.gov.me/dokumenta/4d95d6d8-ace1-4338-96ce-0f4de29c36b0>; Guidelines for the Preparation of Strategic Documents, 2023, <https://www.gov.me/dokumenta/e9e70d2e-5a26-4d67-83cb-11a3471d0d65>

¹⁴ Manual for the Evaluation of Strategic Documents, 2022, <https://www.gov.me/dokumenta/54336d53-335b-4811-91aa-7298bcacc991>

evaluation was conducted in a transparent, professional, and objective manner, in compliance with the methodological guidelines and deadlines defined in the evaluation plan at the beginning of the process. In this capacity, the Ministry of Public Administration was responsible for establishing and leading the work of the Evaluation Reference Group, ensuring efficient communication among all stakeholders involved in the process. The Evaluation Reference Group, as the working body overseeing the implementation of the evaluation, comprised representatives from relevant institutions and stakeholders, and its primary role was to ensure the quality and credibility of the evaluation process by reviewing key documents and reports. The evaluation itself was conducted by an independent evaluator who, in cooperation with the evaluation manager and the reference group, finalized the methodology, performed the analysis and evaluation, and drafted the final evaluation report.

In accordance with the planned timeline of the evaluation process agreed between the Ministry of Public Administration and the independent expert, an indicative activity plan was prepared, establishing specific deadlines for the execution of the evaluation process during May and June 2026. The indicative activity plan for conducting the external evaluation is presented in the figure below. In the first week of July, the final version of the report on the conducted external evaluation of the Strategy and accompanying Action Plans was completed, incorporating comments from the Ministry of Public Administration and the Evaluation Reference Group.

Figure 1.

Indicative Activity Plan for Conducting the External Evaluation *Period May-June 2026*



The external evaluation methodology is based on a combination of quantitatively limited but mutually complementary research methods, namely:

- Analysis of documentation and secondary data sources (desk research);
- Qualitative research and analysis, through consultations and focus groups.

The evaluation process commenced with a detailed analysis of relevant documentation and secondary data sources. First, the Public Administration Reform Strategy 2022–2026 itself and the Action Plans for the periods 2022–2024 and 2025–2026 were analyzed. Subsequently, the annual reports on the implementation of the Action Plans, developed by the Ministry of Public Administration in accordance with the aforementioned Methodology for Policy Development, Drafting, and Monitoring the Implementation of Strategic Documents and the Guidelines for Reporting on the Implementation of Strategic Documents¹⁵ were reviewed. These include the annual implementation reports of the Action Plan 2022–2024 for the years 2022, 2023, and 2024¹⁶, and the Implementation Report of the Action Plan 2025–2026 for the year 2025¹⁷, which track progress in the implementation of the Strategy and provide insight into the trends of output and outcome indicators, the level of implementation of activities and operational objectives of the Strategy, and implementation challenges, on an annual basis.

Subsequently, international reports were analyzed as an exceptionally vital source of data for evaluating the achieved outcomes in the field of public administration reform in Montenegro. The following relevant reports were utilized for the analysis: the SIGMA Monitoring Report on Public Administration in Montenegro for 2024¹⁸, the Action Plan for Fulfilling the Recommendations from the European Commission Montenegro Progress Report 2024¹⁹, the European Commission Montenegro Progress Report 2025²⁰,

¹⁵ Guidelines for Reporting on the Implementation of Strategic Documents, 2020, <https://wapi.gov.me/download-preview/0ae9b906-dc2d-4224-876c-fbebbc2ac1e3?version=1.0>

¹⁶ Report on the Implementation of the Action Plan for the Implementation of the Public Administration Reform Strategy 2022–2026 for the Year 2022, <https://wapi.gov.me/download-preview/d549cffb-73ce-4dfe-b255-7cbf41c63bb5?version=1.0>

Report on the Implementation of the Action Plan for the Implementation of the Public Administration Reform Strategy 2022–2026 for the Year 2023, <https://wapi.gov.me/download-preview/a2fdab57-280f-409a-b7f6-80ff1d7ae225?version=1.0>

Report on the Implementation of the Action Plan 2022–2024 of the Public Administration Reform Strategy 2022–2026 for the Year 2024, alongside the Action Plan 2025–2026 for the Implementation of the Public Administration Reform Strategy 2022–2026, <https://wapi.gov.me/download-preview/6e85b99d-cba5-4c72-aa02-195b2c849fca?version=1.0>

¹⁷ Report on the Implementation of the Action Plan 2025–2026 of the Public Administration Reform Strategy 2022–2026 for the Year 2025, <https://wapi.gov.me/download-preview/124aecf4-1d37-46b2-88be-8782b78ba626?version=1.0>

¹⁸ Public Administration in Montenegro 2024: Assessment against the Principles of Public Administration, 2024, https://www.sigmaweb.org/content/dam/sigma/en/publications/reports/2025/01/public-administration-in-montenegro-2024_c2dea1af/6b3dec38-en.pdf

¹⁹ Action Plan for the Fulfillment of Recommendations from the European Commission Report on Montenegro 2024, <https://wapi.gov.me/download-preview/972a1e17-eb4b-4974-a44d-77b62b67e2a9?version=1.0>

²⁰ Commission Staff Working Document: Montenegro 2025 Report, accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social

as well as the PAR Monitor 2024/2025²¹. Additionally, the Operational Conclusions of the Special Group on Public Administration Reform from 2024 and 2025²², were taken into account, alongside the implementation of the Reform Agenda of Montenegro 2024–2027²³ and the fulfilment of the UN Sustainable Development Goals (SDGs)²⁴.

Following the documentation analysis, three focus groups were organised. The focus groups were held on June 4 and 5, 2026, with representatives of institutions involved in the implementation of the Strategy and the current Action Plan across all five strategic objectives, as well as with representatives of the non-governmental sector who act as observers of the Strategy and accompanying Action Plans implementation process. The list of guiding questions used during the focus groups is presented in Annex 1 of this report. During the focus groups, which were consistently attended by representatives of the Ministry of Public Administration, discussions covered the relevance, coherence, effectiveness, efficiency, impacts, and sustainability of the Strategy and accompanying Action Plans, alongside challenges in their implementation, coordination, and reporting. Throughout the entire evaluation process, regular consultations were held with representatives of the Ministry of Public Administration regarding all aspects of the evaluation, both organizational-technical and substantive (primarily concerning the assessment of the established management system for the implementation of the Strategy and Action Plans, coordination of implementation, monitoring, and progress reporting, as well as the actual effectiveness of the existing implementation, coordination, monitoring, and reporting structure). Following the focus groups, a set of questions related to specific activities and indicators was distributed to the institutions participating in the implementation of the Strategy and Action Plans to assess progress as precisely as possible. These were completed by representatives of the competent institutions and submitted to the Ministry of Public Administration. Finally, a discussion was held with SIGMA representatives to address the progress made in relation to the latest 2024 SIGMA Monitoring Report on Public Administration Reform implementation in Montenegro.

The qualitative part of the research, based on the focus groups and interviews with relevant stakeholders, enabled a better understanding of the underlying causes behind the patterns and trends identified during the desk research. By combining the findings from the documentation analysis with the results of the qualitative research, it

Committee, and the Committee of the Regions – 2025 Communication on EU Enlargement Policy, <https://api.skupstina.me/media/files/1766405688-izvjestaj-evropske-komisije-o-napretku-crne-gore-za-2025-godinu-cg.pdf>

²¹ PAR Monitor Reports, <https://www.par-monitor.org/par-monitor-reports/>

²² Operational conclusions of the PAR Special Group (Public Administration Reform Special Group) from 2024 (<https://www.gov.me/dokumenta/0160d89e-4add-48ac-8baf-2ae7b18312e8>) and 2025 (<https://www.gov.me/dokumenta/df476a32-05c8-4b68-915e-bd9a9c0cd0fa>)

²³ Reform Agenda of Montenegro 2024-2027 for the EU Reform and Growth Facility, <https://www.eu.me/wp-content/uploads/2026/04/Reformska-agenda-Crne-Gore-finalna.pdf>

²⁴ <https://montenegro.un.org/me/sdgs>

was possible to formulate objective findings and conclusions, as well as practical and applicable recommendations for improving the process of implementation, coordination, monitoring, and reporting on the realization of the Strategy and the current Action Plan, along with all associated procedures.

For the purposes of this evaluation, evaluation criteria, evaluation questions, and evaluation methods were defined. The detailed evaluation criteria, evaluation questions, and the methods used are presented in Annex 2 of this report. The evaluation criteria are aligned with the guidelines from the Manual for the Evaluation of Strategic Documents and the requirements from the Information on the Evaluation of the Public Administration Reform Strategy 2022–2026.²⁵ A shortened version of this matrix is presented in the table below.

Table 1.

<i>Evaluation Criterion</i>	What does the evaluation answer?	How was it assessed?
Relevance	Are the objectives and measures of the reform still necessary and aligned with user needs and institutional capacities?	Documentation analysis, focus groups, interviews with the MPA and SIGMA
Coherence	Is the reform aligned with other policies, reforms, and international standards?	Strategic documentation analysis, monitoring data, focus groups, interviews with the MPA and SIGMA
Effectiveness	Have the planned results been achieved and what contributed to the success or limited the progress?	Indicator analysis, focus groups, questionnaires, risk analysis
Efficiency	Have resources, coordination, and management mechanisms been utilized in the best possible way?	Management structure analysis, financial analysis, monitoring data, focus groups, interviews with the MPA and SIGMA, online questionnaires on individual indicators
Impact	What concrete changes has the reform brought to citizens, businesses, and the public administration?	National indicator analysis, focus groups, online questionnaires on individual indicators
Sustainability	Will the reform results persist after the completion of the Strategy?	Capacity analysis, funding analysis, documentation analysis, and attitudes of representatives of the involved institutions

The result of the evaluation process is a comprehensive draft of the External Evaluation Report on the Public Administration Reform Strategy and its accompanying Action Plans. This report presents the findings, conclusions, and

²⁵ Information on the Evaluation of the Public Administration Reform Strategy 2022–2026
<https://www.gov.me/dokumenta/394759b8-b06d-4d1e-9fea-eb6600aac66>

recommendations based on the conducted evaluation process, which included a systematic and objective assessment of the strategic documents in question, a detailed analysis of their content, implementation, and progress made, and finally—an assessment of the relevance, coherence, effectiveness (the level of goal achievement), efficiency, achieved impacts, and sustainability of the accomplishments and the reform in the upcoming period.

The evaluation, however, is subject to certain methodological limitations arising from data availability, as well as its specific character due to the timing of its implementation. First and foremost, the availability and quality of data for monitoring vary across individual operational objectives. Data on the achieved values for a certain number of indicators are unavailable, which has limited the possibility of a consistent effectiveness assessment. Furthermore, detailed cost data at the level of individual activities are not systematically available, thereby reducing the reliability of the efficiency analysis. Another data-related limitation is that the evaluation relies, among other things, on qualitative data sources, including information and insights from focus groups and stakeholder consultations. Although these sources provide valuable insights into progress, challenges in public administration reform implementation, and the views of representatives from relevant institutions participating in the execution of the evaluated strategic documents, implementation coordination, and progress reporting, they cannot fully replace quantitative evidence of realized outcomes and impacts.

Finally, given the very fact that this external evaluation was conducted during the validity period of the Strategy and the current Action Plan, and that only short-term results and certain early outcomes could be confirmed so far, it is not possible to provide an assessment of the long-term impacts of the reform (as impacts are, as a rule, achieved over the long term). Therefore, the references to the reform's impact in this report are based on early indicators and observed trends rather than on verified long-term effects. For the same reasons, while the findings related to impact should be interpreted as indicative rather than conclusive, the findings regarding the sustainability of the reform must also be interpreted conditionally. In other words, whether the reform is sustainable in the long term will only become apparent after the expiration of the planning cycle. At this stage, sustainability is assessed conditionally, based on whether the key legal, institutional, and financial prerequisites for the continuity of reform processes and the maintenance of achievements are being successfully established through the implementation of the Action Plan.

4. Findings and Conclusions

Findings on Relevance, Coherence, Effectiveness, Efficiency, Impact and Sustainability

4.1. Relevance and Coherence

The extent to which the planned objectives of the Strategy and activities in the Action Plans 2022–2024 and 2025–2026 are relevant to priority needs and cross-sectoral needs

The objectives of the Strategy and the accompanying action plans remain highly relevant to Montenegro's priority needs, primarily due to their inextricable link with the EU integration process, as well as their connections with other strategic documents and reforms. The Strategy and the accompanying Action Plans contribute to the creation of an accountable, efficient, and optimal public administration that will ensure high-quality services for citizens and contribute to economic stability and the competitiveness of the economy, which will ultimately guarantee the fulfilment of EU membership requirements. Namely, public administration reform is one of the components of Cluster 1: Fundamentals (alongside the functioning of democratic institutions, judiciary and fundamental rights, justice, freedom and security, economic criteria, public procurement, statistics, and financial control), which is the first to open and the last to close in the EU accession negotiations. Along with the rule of law and economic reforms, public administration reform represents one of the three key pillars of the EU enlargement process and is directly linked to the fulfilment of criteria in the most critical negotiating chapters, 23 and 24. Furthermore, the Strategy followed the logic of the reform areas established in the SIGMA document Principles of Public Administration²⁶, and throughout the implementation period, it respected SIGMA recommendations aimed at public administration reform²⁷, to ensure that Montenegro's public administration is prepared for EU membership to the greatest extent possible. Finally, when defining its objectives, the Strategy also took into account the broader strategic framework, such as the United Nations (UN) 2030 Agenda for Sustainable Development²⁸.

²⁶ https://www.sigmaweb.org/en/publications/the-principles-of-public-administration_7f5ec453-en.html

²⁷ Public administration in Montenegro 2024, Assessment against the Principles of Public Administration https://www.sigmaweb.org/content/dam/sigma/en/publications/reports/2025/01/public-administration-in-montenegro-2024_c2dea1af/6b3dec38-en.pdf

²⁸ UN Sustainable Development Goals - SDGs, <https://montenegro.un.org/me/sdgs>

Public administration reform is positioned high among the priorities of the Government of Montenegro, with a vision to create a professional public administration that delivers high-quality services to end-users and possesses adequate capacities for EU accession, as well as to become a full EU member. All of this makes the objectives of the Strategy permanently relevant to the national priority of EU membership. Its significance goes beyond mere administrative change; it is the foundation for creating an accountable, efficient, and transparent administration that serves as a driver of economic growth, economic competitiveness, and, most importantly, the improvement of the quality of life for every citizen of Montenegro. The interest of the Strategy's target groups and other stakeholders in this strategic document further proves its relevance and the relevance of the reform.

The current Action Plan 2025–2026 is focused on fulfilling the previously defined priority objectives and their associated unrealized activities, including new activities aimed at meeting the recommendations of the European Commission (EC) and SIGMA directed toward improving the state of public administration in Montenegro. Specifically, when defining the activities in the Action Plan 2025–2026, special attention was paid to analysing the findings and designing activities aligned with the recommendations from the European Commission Montenegro Progress Report²⁹ i and the Action Plan for Fulfilling the Recommendations from this report³⁰, the implementation of the Reform Agenda of Montenegro 2024–2027³¹ (particularly regarding the digitalisation of services and the inclusiveness of evidence- and data-based rulemaking and policy-making processes), the implementation of the Operational Conclusions of the Special Group on Public Administration Reform³² and the fulfilment of recommendations from the 2024 SIGMA Monitoring Report on Public Administration in Montenegro³³.

When setting the objectives of the Strategy and the activities in the accompanying Action Plans, alignment with national overarching documents was carefully taken into account. The Strategy and its accompanying Action Plans are in line with the strategic documents that were drafted in parallel with the formulation of the Strategy. For instance, the preparation of the Strategy was conducted as a parallel process complementary to the development of the Public Financial Management Reform

²⁹ EC Progress Reports on Montenegro: <https://www.eu.me/izvjestaji-eu-o-napretku-crne-gore/>

³⁰ Action Plan for the Fulfillment of Recommendations from the European Commission Report on Montenegro 2024, <https://wapi.gov.me/download-preview/972a1e17-eb4b-4974-a44d-77b62b67e2a9?version=1.0>

³¹ Reform Agenda of Montenegro 2024-2027 for the EU Reform and Growth Facility <https://www.eu.me/wp-content/uploads/2026/04/Reformska-agenda-Crne-Gore-finalna.pdf>

³² Operational Conclusions of the Public Administration Reform Special Group from 2024 <https://www.gov.me/dokumenta/0160d89e-4add-48ac-8baf-2ae7b18312e8>

³³ Public administration in Montenegro 2024, Assessment against the Principles of Public Administration https://www.sigmaweb.org/content/dam/sigma/en/publications/reports/2025/01/public-administration-in-montenegro-2024_c2dea1af/6b3dec38-en.pdf

Programme for the same period 2022–2026³⁴, thereby achieving alignment in key reform areas. This synergy ensured that issues such as managerial accountability, internal control, and audit are treated uniformly across both documents, while the introduction of the programme budget is directly linked to the strategic planning of institutional operations. In addition, the Strategy was developed in continuous coordination with the teams responsible for drafting the Digital Transformation Strategy³⁵, the Cyber Security Strategy (2022–2026)³⁶ and the Strategy for Cooperation between Public Administration and the Non-Governmental Sector³⁷, which enabled the definition of shared directions in the fields of e-services, open data, and the quality of public consultations. This inclusive approach, supported by the ministries in charge of finance and economic development, aimed to overcome fragmentation and create an accessible and transparent administration. The Strategy is also aligned with the new Montenegro Accession Programme to the EU 2026–2027³⁸ and the Economic Reform Programme of Montenegro 2026–2028³⁹ (regarding municipal debt and monitoring public sector employment).

Examples of complementarity and issues of common interest for the Public Administration Reform Strategy 2022–2026 (PAR Strategy) and other sectoral strategic documents, such as the Public Financial Management Reform Programme 2022–2026 (PFM Programme), the Digital Transformation Strategy 2022–2026 (DTS), and the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022–2026 (NGO Strategy):

Integrated Strategic and Budgetary Planning: The PAR Strategy, through Operational Objective 5.1 (Strengthening the data-driven planning system for sustainable policies and Government priorities), and the PFM Programme, through Operational Objective 1.2.4 (Strengthening the link between strategic plans and the budget), envision the drafting of a methodology for integrated planning and costing of strategic documents. Complementary activities include the analysis and linkage of IT systems for strategic planning, monitoring, and reporting with the programme budget system.

Managerial Accountability and Internal Control (PIFC): The PAR Strategy, through Operational Objective 1.1 (Functional public administration with efficient oversight and the concept of managerial accountability), and the PFM Programme, through Operational Objective 4.1.1 (Improving managerial accountability and risk management procedures), deliver complementary activities. These encompass the preparation of an analysis of managerial accountability in state administration and joint training sessions for managers on accountability, delegation, and internal reporting.

Fiscal Discipline and RIA at the Local Level: The PAR Strategy, through Operational Objective 5.3 (Increasing the scope and strengthening the capacity for RIA), and the PFM Programme, through Operational Objective 1.2.2 (Methodological framework for medium-term budget planning of local self-governments), provide for a complementary upgrade of the Regulatory

³⁴ <https://www.gov.me/clanak/azurirani-program-reforme-upravljanja-javnim-finansijama-2022-2026>

³⁵ <https://www.gov.me/dokumenta/0c802520-e016-41ee-a6e4-7af6eb66e19d>

³⁶ <https://wapi.gov.me/download-preview/85e2a9d0-0d3c-483a-9822-515d3b7798de?version=1.0>

³⁷ <https://wapi.gov.me/download-preview/b614923d-c855-4ff5-9bcb-5786b4227159?version=1.0>

³⁸ <https://www.gov.me/dokumenta/e7a3bc57-b3bc-4e81-b1f2-58d9026a57f6>

³⁹ <https://wapi.gov.me/download-preview/e4993578-0a25-4634-9c07-668aa53e715d?version=1.0>

Impact Assessment (RIA) methodology and the methodology for assessing fiscal impacts on local budgets.

Interoperability and Development of User-Oriented E-Services: The PAR Strategy, through Operational Objective 2.2 (Full interoperability of information systems and more e-services), and the DTS, through Operational Objectives 1.2 (Availability, interoperability, and data management) and 2.2 (Quality, quantity, and usage of e-services), plan a complementary data exchange among core registries via the SISEDE platform. Activities include registering registries, establishing interoperability standards, upgrading SISEDE, and developing a methodology for new e-services.

Coordination and Digital Skills: The PAR Strategy, through Operational Objective 3.2 (Public administration as an attractive employer), plans digital skills training for civil servants, while the DTS, through Operational Objective 1.4 (Developing digital knowledge and skills of Montenegrin society), introduces complementary training sessions for vulnerable groups of citizens to increase the utilization of e-services.

Inclusiveness in Policy Making: The PAR Strategy, through Operational Objective 5.1 (Strengthening the data-driven planning system), and the NGO Strategy, through Measure 1.3 (Strengthening public administration capacities for efficient NGO participation in public policies), implement complementary activities for greater public involvement in policy making. This entails training and mentorship for civil servants, the promotion of best practices, and the effective use of e-platforms.

Digitalisation of NGO Registration: The PAR Strategy, through Operational Objective 2.2 (Full interoperability and high-sophistication e-services), envisages the development of the eNGO e-service. This activity is complementary to Measure 1.1 of the NGO Strategy (Improving the regulatory and institutional framework for cooperation with NGOs), which mandates the simplification of NGO registration procedures.

The findings of the 2024 SIGMA report, which assessed the situation in 2023, state that Montenegro developed a set of well-designed reform interventions, activities, and plans, aligned with the Principles of Public Administration, which clearly address relevant issues. At that time, SIGMA positively assessed the fact that the Strategy and the Action Plan contained indicators with baseline and target values, which was deemed a prerequisite for efficient monitoring of progress toward the set objectives of the public administration reform. It was also assessed that overall accountability for leading the reforms had been established, while the responsibility for implementing operational activities was assigned to specific institutions.

The accompanying Action Plans served as essential operational tools for operationalising the Strategy, converting high-level objectives into measurable steps with precisely defined deadlines, budgets, and lead institutions. The Action Plan 2022–2024 laid the foundations of the reform, focusing primarily on strengthening fiscal discipline in local self-government units by establishing enhanced supervision over the financial operations of local self-governments, developing digital infrastructure such as the eDMS system and the eGovernment portal, implementing quality management mechanisms, establishing electronic data exchange between registries, and ensuring prerequisites for data-driven planning. The Action Plan 2025–2026 ensures the continuity

of the process and introduces an innovative approach by linking activities with the Sustainable Development Goals (SDGs) and the Green Agenda. Its particular significance is reflected in a better adaptation to the realistic capacities of the administration, which is evident through more rational planning of resources and activities following the lessons learned regarding the slower implementation dynamics of the Action Plan 2022–2024. Furthermore, as previously mentioned, the Action Plan 2025–2026 ensured relevance by redefining activities to align with the latest findings of the 2024 SIGMA report and the recommendations of EC.

The successful implementation of the Strategy is a direct condition for the withdrawal of over EUR 20 million in Sector Budget Support from EU funds (IPA III), as well as funds based on the implementation of the Reform Agenda, which encompasses certain aspects of public administration reform. The Reform Agenda plans reform 2.4.3: Delivery of user-friendly digital public services, which is directly linked to Strategic Objective II of the Strategy ("Citizens and businesses use high-quality public administration services"), namely activities related to creating a new single e-government portal, achieving full interoperability of information systems, and increasing the number of electronic services at a high level of sophistication. Furthermore, reform 1.1.3: Removing regulatory barriers and facilitating business operations sets a requirement that 100% of new laws must be subject to public consultations and undergo a Regulatory Impact Assessment (RIA) prior to public consultations, which is linked to Strategic Objective V of the Strategy ("Policy planning with citizens and for citizens"). For the implementation of reform 2.4.3, financial support from the EU in an amount exceeding EUR 8.1 million is envisaged, while for the implementation of reform 1.1.3, support of nearly EUR 3.5 million is planned. This highlights the critical role of public administration reform, not only in modernising services but also in contributing to the overall fiscal stability of the state through direct support to the national budget.

Unlike previous cycles, the Strategy 2022–2026 has a significantly broader scope of action and covers over 540 institutions, including state authorities, agencies, but also public institutions and local self-governments. This, above all, has ensured the relevance of the reform, as well as a uniform quality standard for its implementation at all levels. The Strategy is also relevant because it places important horizontal topics at the center of attention, such as human rights, gender equality, inclusiveness, and digitalisation, promoting an administration that is based on data and evidence. In conclusion, the Strategy and the accompanying Action Plans represent Montenegro's roadmap toward a modern European administration that is fully at the service of its citizens. They ensure that the reform is not implemented haphazardly, but through a coordinated process that keeps human rights and the actual needs of citizens and the economy at the very core of all planned interventions.

Regarding the involvement of municipalities in the drafting of the Strategy and Action Plans, local-level officials who participated in the focus groups pointed out that, so far, municipalities have articulated their demands through the Union of Municipalities, and that they are satisfied with this level of coordination. Namely, they consider this already established practice to be good because the Union of Municipalities gives proposals coming from municipalities greater political strength and bargaining power before decision-makers. Although a separate strategic objective for the local level has not been established within the Strategy and Action Plans, all activities relating to municipalities are covered by a special annex "List of activities in which local self-government units are recognized". Respondents stated that they participate in public hearings of importance to the local level, and that the Union of Municipalities actively collects proposals; however, a problem was identified in that the Government rarely takes them into account. Regarding the activities of involving municipalities in the application of the methodology for drafting strategic documents and reporting, local officials who participated in the focus groups stated that ways are being considered on how to establish the application of the methodology at the local level in cooperation with the Ministry of Regional Development. Despite not having an obligation to apply the methodology, municipal officials express readiness to attend training sessions and apply the methodology.

The actual changes directed toward satisfying user needs, which have been achieved through the implementation of the Strategy and Action Plans, are reflected, first of all, in faster and simpler paperless services. There are currently 51 electronic services on the eGovernment portal, and representatives of institutions who participated in the focus groups and deal with digitalisation highlight the positive response of citizens to the establishment of electronic services, after an adjustment period. They also state that the established services generally persist, while some of them even achieve a high share of requests in the total number of requests (60-85%). For the economy, the reform implies the reduction of bureaucratic barriers and the digitalisation of transactional services, while the administration gains in professionalisation through the introduction of quality management systems and the simplification of the administrative process through the linkage of registries and paperless operations. As one of the problems in achieving a positive impact of digitalisation on citizens and the economy, participants noticed insufficient alignment of regulations in the field of electronic services, as well as difficulties of officials regarding the application of regulations governing electronic government, electronic identification and signature, electronic document, and information security. It was stated that this represents an obstacle to the modernisation and efficiency of public administration because digitalisation possibilities are not being fully utilized.

A finding from the focus groups regarding relevance is also that the objectives are adequate and relevant in relation to the identified problems that needed to be solved and for satisfying the priority needs of citizens. Representatives of institutions who participated in the focus groups believe that the same strategic and operational objectives should be retained in the next planning cycle. Regarding the relevance and adequacy of activities for achieving outcomes at the operational objective level (and not just direct outputs), respondents stated that the activities are relevant and adequate in relation to the planned outcomes. It is also a finding that the activities are acceptable from the standpoint of the institutions that should implement them, but also of citizens and business entities. However, when it comes to performance indicators, representatives of institutions who participated in the focus groups believe that reporting against outcome indicators at the operational objective level and output indicators at the activity level was not carried out in accordance with the planned deadlines and in the planned manner.

Based on the analysis of the Strategy and the accompanying Action Plans, as well as the annual reports on the implementation of the Strategy and Action Plans so far, however, it has been observed that certain activities do not correspond to the needs set out in the Strategy. In other words, the question arises as to their adequacy and relevance for solving the identified problems and achieving the operational objectives to which they belong, as well as achieving the target values of the accompanying performance indicators. This creates a gap that prevents a substantive transformation of the system.

Examples of gaps between problems, activities, and set objectives:

Administrative Oversight over the Operations of Authorities: Within the problem analysis of the Strategy, the lack of sufficient monitoring mechanisms, accountability, and legality control of institutional operations, the non-existence of a risk register, and insufficient capacities of the Administrative Inspection were cited as deficiencies in implementing oversight. Furthermore, within the Indicator Passports, it was stated that it is necessary to prepare "three methodologies for the application of administrative oversight mechanisms, specifically regarding: exercising oversight over the legality and expediency of the work of administration bodies; exercising oversight over the legality and expediency of the work of local self-government bodies in the application of systemic laws (following amendments to the Law on Local Self-Government, which should more closely define this competence); and exercising oversight over the legality and expediency of the work of local self-government bodies regarding delegated and entrusted tasks." However, apart from activities relating to building the capacity of the Administrative Inspection in the Action Plan 2022–2024, there were no other activities to respond to the stated needs. Furthermore, the Action Plan 2025–2026 planned the activity "Drafting checklist grids for oversight by the Administrative Inspection," while no activity was envisioned to address the need to establish a risk register. Consequently, there is no reporting in implementation reports against the indicator "Number of administration bodies over which administrative oversight was conducted by the line ministry," as it turns out that due to the lack of a methodology, administrative oversights were not conducted;

Labour Disputes, specifically the amount of funds forcefully collected in labour cases represented by the Protector of Property and Legal Interests: The Action Plan 2022–2024 provided for activity 1.1.9: "Drafting an Analysis on the reasons/grounds for the payment of additional enforcement costs based on lost cases and the application of recommendations in institutions recognized for a higher number of disputes" and activity 1.1.10: "Improving the reporting structure of the Protector of Property and Legal Interests on the costs of forced payments based on lost court disputes." Neither of these activities has a direct impact on the outcomes of labour cases, i.e., on reducing the forcefully collected amount. However, the Action Plan 2025–2026 envisages activities related to strengthening inter-institutional cooperation for preventive action in reducing budget costs in labour disputes, improving the capacities of the Protector of Property and Legal Interests, as well as promoting mechanisms for the peaceful resolution of labour disputes;

Inter-Municipal Cooperation: Within the Strategy, it was stated that certain municipalities lack human resource and technical capacities, that it became evident that not all municipalities can exercise the same competences given their differing sizes and capacities, and that inter-municipal cooperation is limited. In both Action Plans, an activity was planned to relate to the realization of two workshops on the importance of inter-municipal cooperation with all municipalities. Despite this, the value of the indicator "Number of tasks in which inter-municipal cooperation has been established" fell from a baseline value of 20 to 16 in 2025, which may indicate both an insufficient number of activities and their inadequacy to solve the observed problems;

Lack of Competition in Public Administration Recruitment: The Strategy identified the following problems: a low number of candidates, low salaries for specialized fields (IT), lengthy recruitment procedures, the non-existence of online applications for job vacancies, etc. The Action Plan 2022–2024 provided for an activity to introduce online applications and an activity relating to promotional actions to stimulate recruitment in the public administration (video clips and social media). The Action Plan 2025–2026 again envisages the activity of introducing online applications, as well as an activity to improve the selection process of applied candidates in accordance with the Decree on criteria and closer manner of conducting checks of knowledge, abilities, competencies, and skills for work in state authorities. Meanwhile, the average number of candidates fluctuates between 1.68 and 3.14, which is still far from the target value for 2026, which stands at 6;

Insufficiently Proactive Publication of Data in the Possession of Public Authorities in a Machine-Readable Format: To respond to this problem identified in the Strategy, the Action Plan 2022–2024 provided for the activity "Organizing a campaign to raise public and public administration awareness on the importance of open data and its value," while the Action Plan 2025–2026 added the activity "Promoting the preparation of data in a machine-readable format." Meanwhile, the percentage of institutions publishing data on the Open Data Portal increased from 1.5% to 3.38% of institutions; however, this is also far from the target value for 2026, which is 15%.

The extent to which the objectives of the Strategy and Action Plans corresponded to the implementation capacities in Montenegro

In the practice of implementing the Strategy and Action Plans, a gap has been observed between the ambitiously set objectives and the realistic capacities of the administration to execute them:

- Political instability: Government reorganisations (the 42nd, 43rd, and 44th Governments), institutional changes, an increase in the number of ministries from 12 to 25, and disruptions in work continuity led to a large number of staff turnarounds and shifts in priorities. Such circumstances, for example, prevented the completion of institutional functional analyses, as the proposed organizational models and collected data became obsolete due to changes in institutional competences before the process itself could be finalized. Furthermore, the initial plan to establish dedicated strategic planning units in each ministry was assessed as financially and organizationally unsustainable due to the large number of line ministries. Consequently, in communication with partners from SIGMA, an alternative model was defined, which entails introducing policy coordination functions within existing positions inside the ministries, possessing the potential to ensure the quality of strategic management while eliminating the fiscal risks that massive new recruitment would bring;
- Limited human resources: The Strategy and Action Plans implementation reports continuously point to a staff shortage in specialized areas, such as IT audit, IT support, and IPA funds management, while the Human Resources Management Authority emphasized the impossibility of conducting certain training sessions due to technical and organizational shortcomings;
- The hybrid cyberattack from August 2022 was a critical turning point that revealed the Government's IT network was not prepared to support the planned dynamics of digital reforms. The attack paralyzed the administration's operations for several months, causing the loss of significant archival materials and documents in progress, which permanently delayed the implementation of activities on the Open Data Portal and electronic data exchange systems. This vulnerability of the system dictated a necessity to shift the focus from new services to the urgent recovery of core infrastructure;
- Financial and donor support: Implementation capacities are largely dependent on external expert assistance (SIGMA, UNDP, the EU, ReSPA) and the Instrument for Pre-accession Assistance (IPA III) programme worth EUR 16.6 million, without which the realization of complex objectives, as well as their sustainability, would be highly questionable.

When asked about the relationship between the ambition of the objectives and the available capacities, focus group participants stated that capacities were initially sufficient, but due to government turnovers and institutional reorganisations, it turned out that there was a lack of adequate capacity. Furthermore, it was necessary for the institutions themselves to work on enhancing their capacities and to properly prioritize the recruitment of staff required to implement the reforms. For example, regarding capacities in the field of public policy coordination, respondents believe that additional efforts should be invested in rationalising the number of strategic documents to relieve capacity constraints. It was also pointed out that collecting data on the Strategy's implementation through the ISPI system would enable real-time monitoring of the Strategy and Action Plans, thereby relieving officials of a portion of the workload related to data collection. AZLP highlighted that it planned to hire 8 new controllers in line with the systematisation of positions currently undergoing the approval process, noting that provisions must also be made for these new employees to attend the necessary training sessions. To increase capacity, the possibility of raising salaries for employees dealing with free access to information is also being considered.

Regarding technical capacities, respondents noted difficulties when registering on the eGovernment and eParticipation portals because participation is enabled only via ID card readers, and in practice, citizens have often lost their PIN codes. Furthermore, there is a need to improve the DMS and ensure its wider application across ministries. The importance of establishing interoperability between different registries was highlighted, alongside the necessity of establishing new registries containing the data required to implement electronic services.

Conclusion on Relevance and Coherence

Based on all the above, it can be concluded that the strategic and operational objectives of the Strategy and Action Plans have fundamentally remained relevant and necessary for an adequate and comprehensive public administration reform in Montenegro, as well as for Montenegro's EU accession process. It was noted, however, that the implementation of the Strategy and Action Plans was burdened by ambitious deadlines that did not take into account the realistic situation on the ground and available capacities. Furthermore, the unstable institutional framework forced the administration to constantly adjust plans and activities and to redefine competences, while still facing the limited capacities of the administration. It was also observed that certain planned activities, particularly in the Action Plan 2022–2024, were not relevant to the identified problems, which ultimately affected the level of achievement of certain operational objectives and the attainment of target values for performance indicators.

Public administration reform is coherent with other reforms, while the Strategy and Action Plans are coherent with other strategic documents. In fact, coherence, alongside

relevance, represents the strongest segment of the reform, as the Strategy has been firmly grounded from the outset in international standards and EU accession processes, with achieved synergy with the Public Financial Management Reform Programme, the Digital Transformation Strategy, and other relevant strategic documents. Although internal coherence was somewhat threatened by structural fragmentation and the splintering of portfolios into 25 ministries, public administration reform retained a high degree of strategic linkage with related public policies.

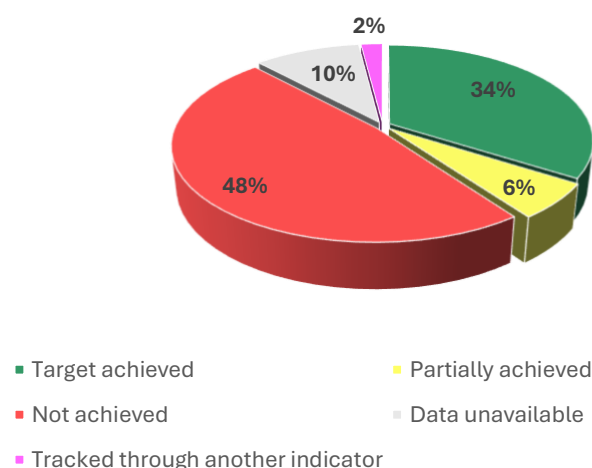
4.2. Effectiveness

To what extent have all five objectives of the Strategy been achieved? Did each intervention contribute to achieving the results, and how well?

Given that the evaluation of the Strategy and the current Action Plan is being conducted before the end of their validity period, it is not yet possible to assess the final degree of achievement of the Strategy's objectives. However, based on the indicator values presented in the 2024 Report and the 2025 Report, it is possible to assess the extent to which the 2024 target values set by the Action Plan for the period 2022–2024 were achieved, and whether the indicator trends in 2025 indicate the possibility of targets being met at the end of the implementation period of the Strategy and the current Action Plan, namely by the end of 2026.

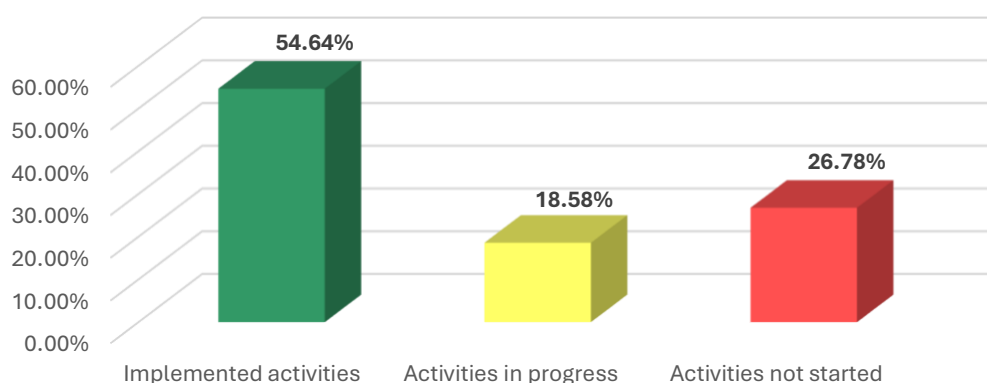
Overall, for the period ending in 2024, the comprehensive achievement of operational objectives can be reviewed by assessing the attainment of performance indicator targets and through the number of implemented activities. The 2024 report states that a positive trend was achieved by 53% of the indicators, stagnation by 7.5% of the indicators, and a negative trend by 17%, while data on indicator values were unavailable for 22.5% of the indicators. Based on data from the tabular section of the 2024 report, an assessment of the degree of achievement of operational objectives for 2024 is presented below in the charts, illustrating the number of indicators where the target value was achieved, partially achieved, or not achieved, alongside the number of indicators for which values were unavailable or monitored through another indicator. Furthermore, the share of implemented activities in the total number of planned activities is shown, followed by the share of activities whose implementation was ongoing at the end of 2024, and the share of activities that had not been started by the end of 2024 in the total number of planned activities. It should be noted that the reports for 2022, 2023, and 2024 state that they monitor 53 indicators, whereas the Strategy defined 51 indicators, and during the implementation of the Strategy, two indicators were abolished while one new indicator was defined. The presentation of data in the subsequent part of this report was carried out based on the 50 indicators that were reported against.

Chart 1. Degree of achievement of performance indicators in 2024



Out of 183 planned activities in the Action Plan for the period 2022-2024, 100 (54,64%) were realized, 34 (18,58%) activities were started, and the realization of 49 (26,78%) activities was not started. Such a low degree of activity realization correlates with a low degree of achievement of target values of performance indicators at the level of operational objectives in 2026 (in 34% of performance indicators the target value was achieved, while in 48% of performance indicators the target value was not realized).

Chart 2. Degree of activity implementation in the AP 2022-2024



When it comes to the degree of achievement of operational objectives within each of the five strategic objectives of the Strategy until the end of 2024, the situation is presented in the charts below. The analysis of the situation at the end of 2024 within each of the five strategic objectives is also presented through: a) the number of indicators with achieved target values, the number of indicators whose target values were not achieved, the number of indicators for which values were unavailable, and the number of indicators monitored through another indicator, and b) the number of activities that were realized, that were ongoing, and that were not started within each of the five strategic objectives.

Chart 3. Degree of achievement of performance indicators in 2024 for Strategic Objective I: Public administration organization and operation focused on the needs of citizens

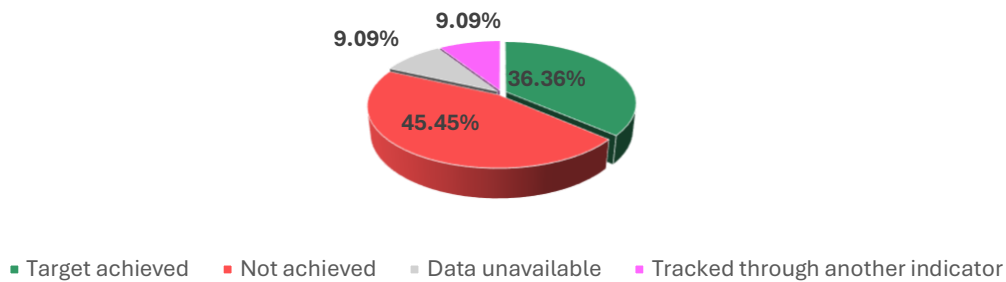


Chart 4. Degree of activity implementation in the AP 2022-2024 for Strategic Objective I: Public administration organization and operation focused on the needs of citizens

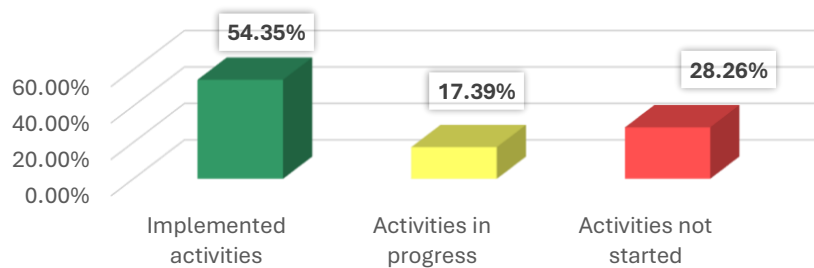


Chart 5. Degree of achievement of performance indicators in 2024 for Strategic Objective II: Citizens and businesses use high-quality public administration services

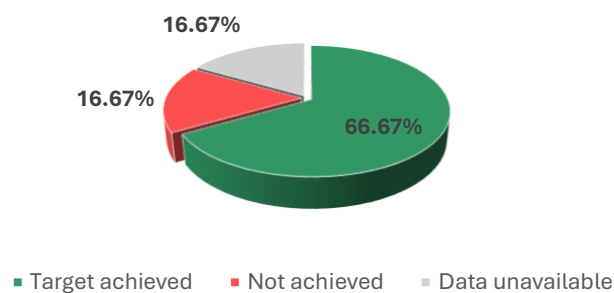


Chart 6. Degree of activity implementation in the AP 2022-2024 for Strategic Objective II: Citizens and businesses use high-quality public services

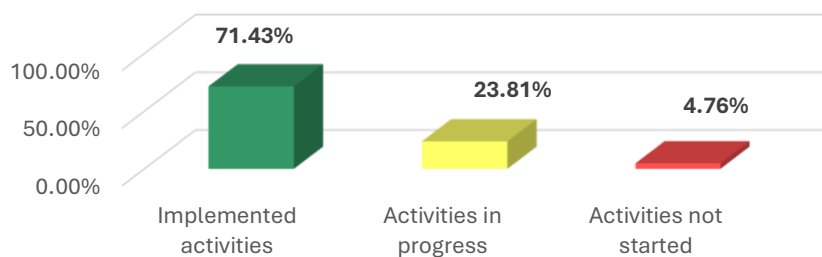


Chart 7. Degree of achievement of performance indicators in 2024 for Strategic Objective III: Professional public administration

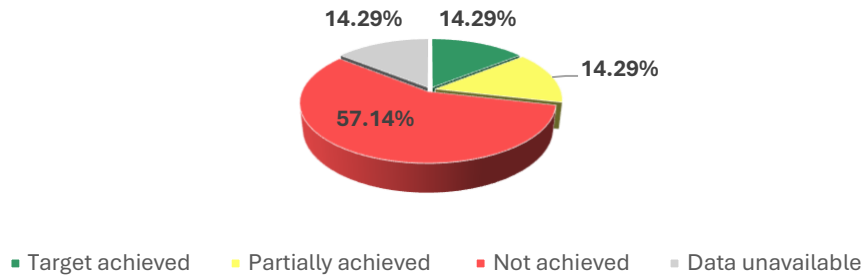


Chart 8. Degree of activity implementation in the AP 2022-2024 for Strategic Objective III: Professional public administration

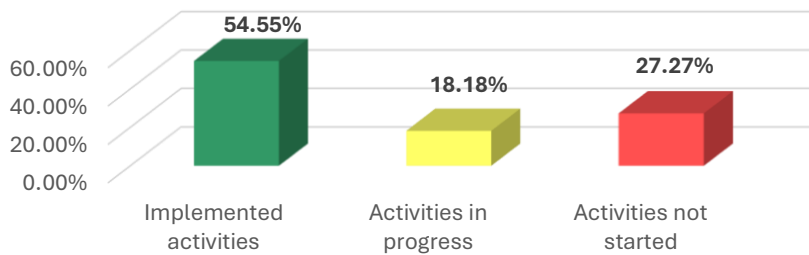


Chart 9. Degree of achievement of performance indicators in 2024 for Strategic Objective IV: Transparent and open public administration

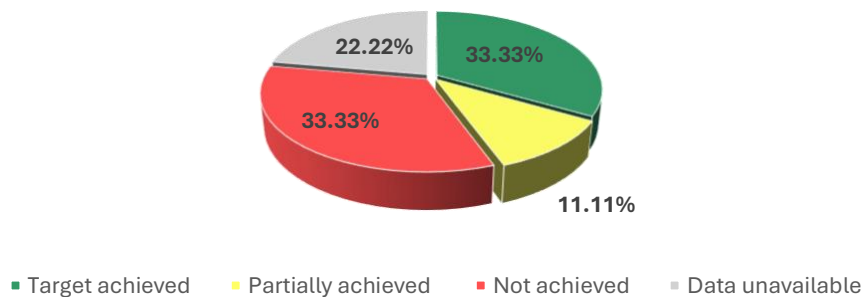


Chart 10. Degree of activity implementation in the AP 2022-2024 for Strategic Objective IV: Transparent and open public administration

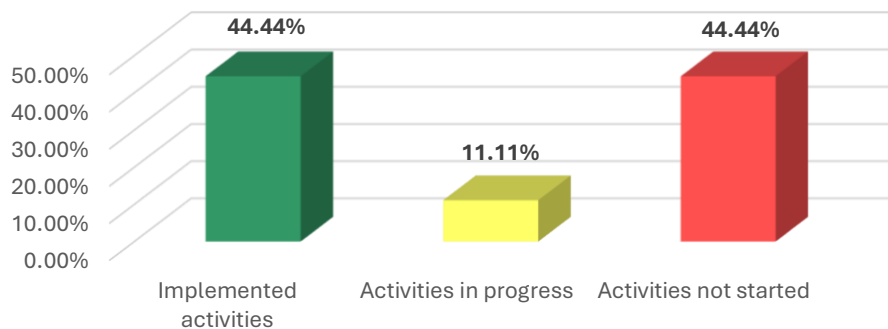


Chart 11. Degree of achievement of performance indicators in 2024 for Strategic Objective V: Policy planning with and for citizens

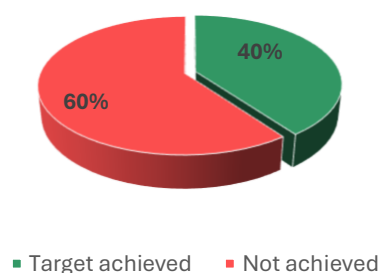
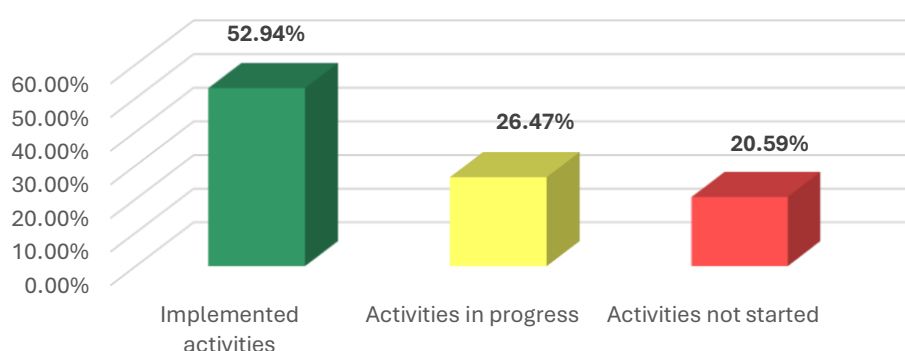


Chart 12. Degree of activity implementation in the AP 2022-2024 for Strategic Objective V: Policy planning with and for citizens



Based on the data presented above as of the end of 2024, it can be determined that there is a correlation between a high share of realized activities (over 70%) and the achieved values of performance indicators within Strategic Objective II (67%). For all other strategic objectives, the degree of activity realization until the end of 2024 was below 55%, which also points to a direct correlation with the level of achieved indicator values, since in none of the other strategic objectives was more than 40% of the target values of performance indicators achieved. Specifically, under Strategic Objective I, 54.35% of activities were realized and 36% of target indicator values were achieved; under Strategic Objective II, 71.43% of activities were realized and 66.67% of target indicator values were achieved; under Strategic Objective III, 54.55% of activities were realized and 14.29% of target indicator values were achieved; under Strategic Objective IV, 44.44% of activities were realized and 33.33% of target indicator values were achieved; under Strategic Objective V, 52.94% of activities were realized and 40% of target indicator values were achieved. The conclusion is that the higher the percentage of realized activities, the higher the percentage of achievement of performance indicator values at the level of operational objectives within each of the strategic objectives. The overall conclusion based on this segment of the analysis indicates that, regardless of the fact that there are some activities in the Action Plans for which a clear and direct link with

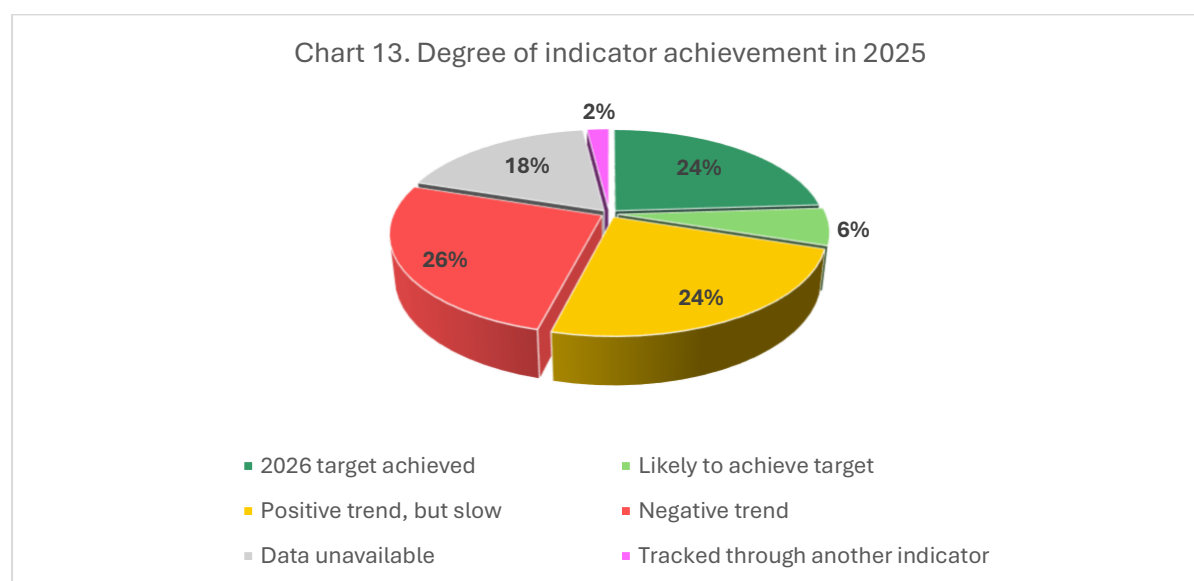
operational and strategic objectives cannot be seen, there is still a logical link between the formulated activities—in the way they are formulated—with performance indicators at the level of operational objectives. This was also confirmed during the focus groups, where the participants also noted that certain planned activities are, in fact, a prerequisite for achieving the planned performance indicators at the level of operational objectives, and that it is precisely in this way that their contribution to the achievement of both operational objectives and strategic objectives is seen.

In its monitoring report from 2024, and based on data from 2023, SIGMA noted that most of the planned improvements in public administration until then were not yet clearly visible. The implementation of the Strategy was, until that moment, assessed as slow, which could be partially explained by the COVID-19 pandemic, the related economic slowdown, and the 2022 crisis caused by cyberattacks, but also by a lack of incentives for top management staff to fulfil plans and report on implementation in a timely manner. SIGMA added in this monitoring report that coordination mechanisms for the implementation of the Strategy at the administrative level were not fully operational until 2024, which led to deficiencies in coordination and potentially to a lack of incentives for implementing the Strategy and achieving results.

A number of activities that were not started by the end of 2024 were transferred to the new Action Plan 2025–2026. Specifically, out of a total of 34 activities that were started by the end of 2024 (19%), the 2024 report states that 29 activities were transferred to the Action Plan 2025–2026 (16%), 1 activity was recognized through the Public Financial Management Reform Programme, and for 4, imminent realization was expected, so they were not transferred to the Action Plan 2025–2026. Also, out of 49 activities whose realization was not started in the period 2022–2024 (27%), the 2024 Report states that 33 activities will be transferred to the Action Plan for the period 2025–2026, while 14 were abandoned, and for 2, no information was provided on whether they will be transferred. However, bearing in mind that the titles of activities and output indicators at the activity level in the Action Plan 2025–2026 deviate from the titles of activities in the Action Plan 2022–2024, it was not possible to determine exactly how many activities were transferred to the Action Plan 2025–2026.

Based on the data from the 2025 Report, the possibility of achieving the target values for 2026 can be assessed. Namely, the 2025 Report states that 52% of the indicators had a positive trend, 6% stagnated, 14% had a negative trend, and for just under 28% of the indicators, the achieved values were not displayed. Although it is not possible to determine the final degree of achievement of performance indicator targets at the level of operational objectives before the end of the Strategy's implementation period, based on the values achieved in previous years up to the end of 2024 and monitoring the trend

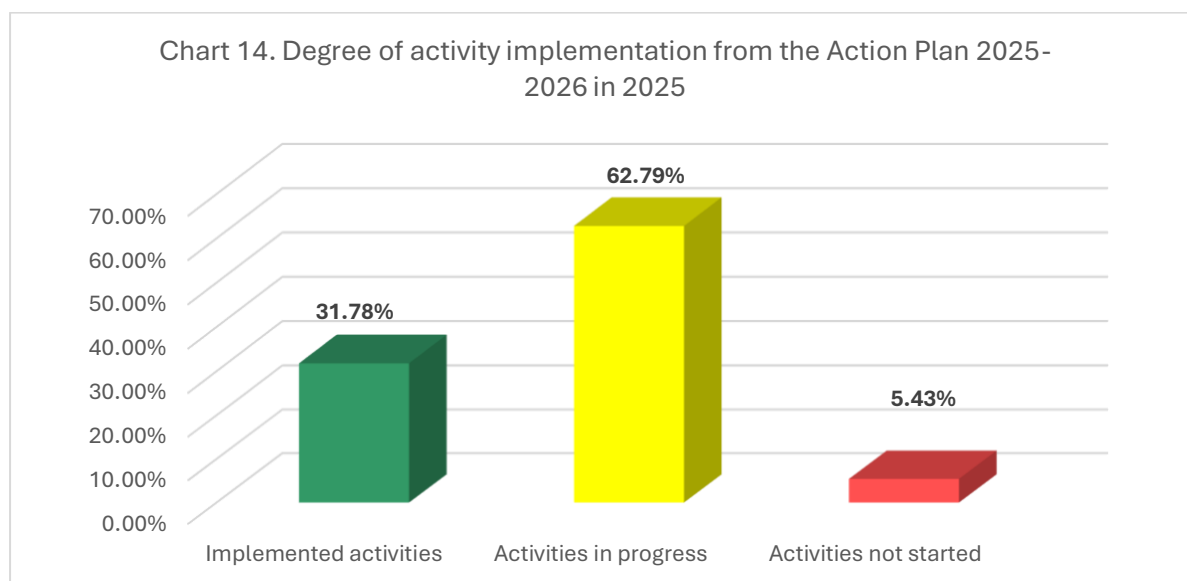
at the end of 2025⁴⁰, it is possible to estimate that the 2026 target value has already been achieved for 12 indicators (24%), while the target value will likely be achieved for another 3 indicators (6%). For 12 indicators (24%), it can be assumed that they will not reach the target values given that the trend is estimated not to be rising fast enough to achieve them; for 13 indicators (26%), a negative trend or stagnation has been recorded so far, which significantly reduces the possibility of achieving the target value; furthermore, for 9 indicators (18%), it is not possible to assess the possibility of achieving the target value due to a lack of data on indicator values, and 1 indicator is monitored through another indicator (2%).



Also, based on the 2025 report, the level of implementation of the planned activities in the Action Plan 2025–2026 until the end of 2025 was assessed. Namely, insights into the data from the tabular section of the 2025 Report indicate that by the end of 2025, 32%

⁴⁰ According to the indicators "% of recommendations implemented by public administration bodies based on the Report of the Protector of Human Rights and Freedoms – Ombudsman", "Percentage of public policy consultations conducted in accordance with the legal framework and SIGMA principles in relation to the number of acts adopted by the Government that are subject to public consultations", "Percentage of laws where the Standard Cost Model is applied for RIA", and "Percentage of high-quality RIAs in relation to the total number of RIAs submitted for the opinion of the Ministry of Finance", reporting was carried out during the evaluation process. On that occasion, the "Percentage of high-quality RIAs in relation to the total number of RIAs submitted for the opinion of the Ministry of Finance" exceeded the target value for 2026 (92.82% compared to 88%), while the indicators "% of recommendations implemented by public administration bodies based on the Report of the Protector of Human Rights and Freedoms – Ombudsman" and "Percentage of laws where the Standard Cost Model is applied for RIA" came very close to the target values for 2026, and can be expected to achieve them by the end of the year. The achieved value for the indicator "Percentage of public policy consultations conducted in accordance with the legal framework and SIGMA principles in relation to the number of acts adopted by the Government that are subject to public consultations" decreased compared to 2024 (from 64.46% to 25.37%), so it can be assumed that it will not reach the target value of 100% in 2026. Regarding consultations, focus group participants pointed out that a certain number of laws do not undergo public debate under the justification of urgency, or are directly proposed and adopted by the Parliament, making it impossible to achieve the indicator value of 100%.

of activities were realized, the implementation of 63% of activities was ongoing, while the implementation of 5% of activities had not been started.



Bearing in mind that only one year has passed since the beginning of the implementation of the Action Plan for the period 2025–2026 and that the largest part of the activities is currently in the process of implementation, as well as the time required to achieve the performance indicator values themselves, it is not possible at this moment to arrive at precise conclusions regarding the correlation between the implementation of activities and the achievement of target indicator values for the Action Plan 2025–2026. What causes concern is the conclusion that, based on data from the annual reports (2022, 2023, 2024, and 2025), the number of indicators for which reporting is absent is increasing, which significantly hinders the assessment of the fulfilment of operational objectives. Specifically, in the 2025 report, it was shown that in 2022, data were unavailable for 6% of indicators, and in 2025 for 28% of indicators. In Annex 3 of this report, tables are presented with performance indicators at the level of operational objectives for which values were not displayed at the end of 2024 and at the end of 2025, meaning for which there was no reporting.

Below are presented the assessments of the achievement of target values of performance indicators at the level of operational objectives from the Action Plan 2025–2026, so far, for each strategic objective, as well as the assessment of the degree of implementation of planned activities. Based on the presented data, a certain intensification of activity implementation can be concluded compared to the Action Plan 2022–2024, especially under Strategic Objective I, but implementation is still ongoing for a large number of activities, making it difficult to conclude whether they will be realized by the end of 2026, and consequently, whether the target values of the performance indicators will be reached. Specifically:

- In Strategic Objective I: Organisation and operation of public administration in the function of citizens' needs, out of 41 activities, 19 have been realized, while implementation is ongoing for 21 of them, and the implementation of 1 activity has not been started. Within the same objective, 1 indicator achieved the 2026 target value in 2025, 1 can be assumed to be achieved in 2026, a positive trend was recorded for 4 indicators but is assessed as slow for reaching the target value, a negative trend was recorded for 3 indicators, while data are unavailable for 1 indicator, and 1 indicator is monitored through another;
- In Strategic Objective II: Citizens and businesses use high-quality public administration services, a certain deterioration in the dynamics of activity implementation is recorded compared to the previous period, and thus, out of 16 activities, 4 have been realized, implementation is ongoing for 11, while the implementation for 1 activity has not been started. Out of 6 indicators for this objective, 2 achieved the 2026 target value in 2025, the trend is rising for 1 indicator but is assessed as slow for reaching the target value, while values are unavailable for the remaining 3 indicators;
- In Strategic Objective III: Professional public administration, out of 31 activities, only 7 have been realized, implementation is ongoing for 20 of them, and for 4 activities, implementation has not started. When it comes to performance indicators, out of 14 indicators provided for this strategic objective, 1 indicator achieved the 2026 target value in 2025, 1 indicator is assessed as likely to achieve it, 3 indicators record a positive trend but it is slow for reaching the target value in 2026, 6 indicators have a negative trend, while values are not available for 4 indicators;
- In Strategic Objective IV: Transparent and open public administration, 3 activities have been realized, while implementation is ongoing for the remaining 13 activities. On the other hand, 4 indicators achieved the 2026 target value in 2025, the trend is positive but insufficiently fast for 4 indicators, while the value for 1 indicator is unavailable;
- In Strategic Objective V: Policy planning with citizens and for citizens, out of 25 activities, 8 have been realized, implementation is ongoing for 16, while the implementation for 1 activity has not been started. Out of 10 indicators for this objective, 4 have already achieved the 2026 target value, 1 has a high probability of achieving it, 1 has a positive but insufficiently fast trend, while 4 indicators have a negative trend.

Chart 15. Degree of indicator achievement in 2025 for Strategic Objective I: Public administration organization and operation focused on the needs of citizens

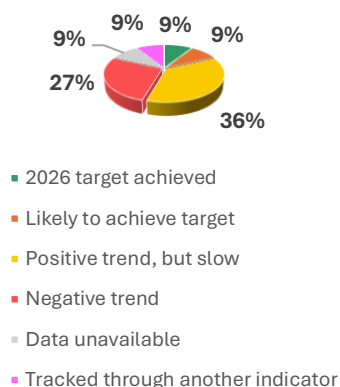


Chart 16. Degree of activity implementation from the Action Plan 2025-2026 in 2025 for Strategic Objective I: Public administration organization and operation focused on the needs of citizens

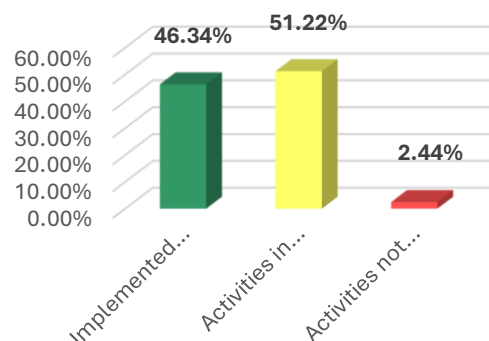


Chart 17. Degree of indicator achievement in 2025 for Strategic Objective II: Citizens and businesses use high-quality public administration services

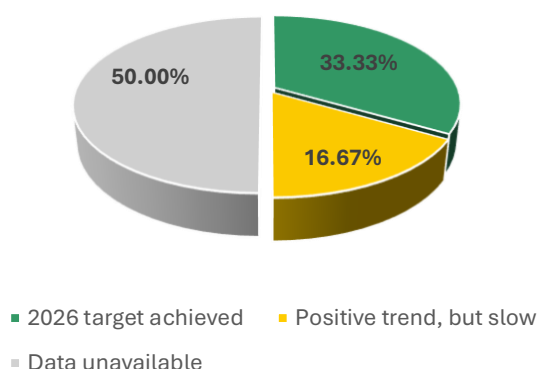


Chart 18. Degree of activity implementation from the Action Plan 2025-2026 in 2025 for Strategic Objective II: Citizens and businesses use high-quality public administration services

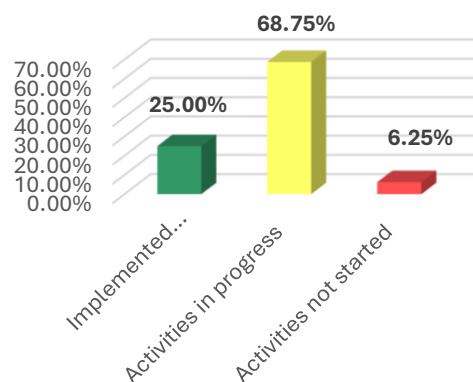


Chart 19. Degree of indicator achievement in 2025 for Strategic Objective III: Professional public administration

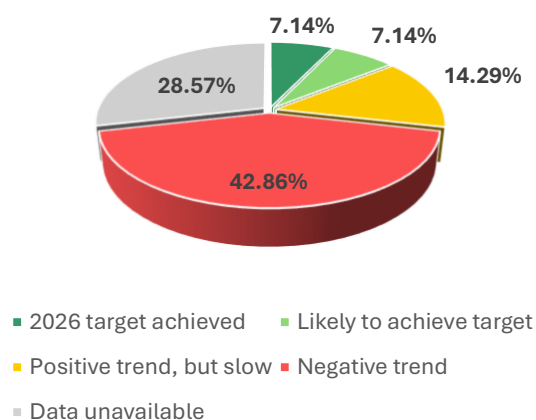


Chart 20. Degree of activity implementation from the Action Plan 2025-2026 in 2025 for Strategic Objective III: Professional public administration

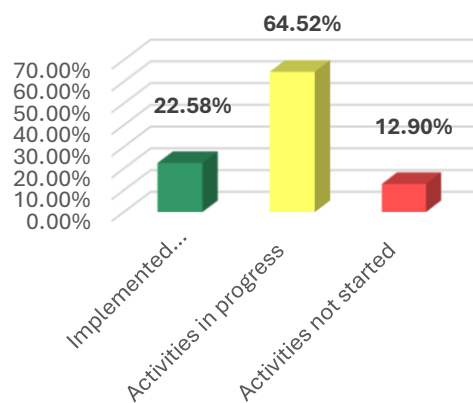


Chart 21. Degree of indicator achievement in 2025 for Strategic Objective IV: Transparent and open public administration

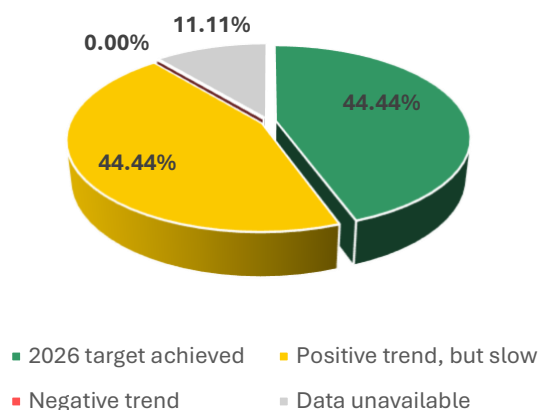


Chart 22. Degree of activity implementation from the Action Plan 2025-2026 in 2025 for Strategic Objective IV: Transparent and open public administration

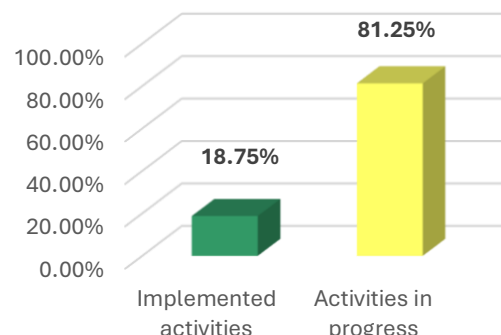
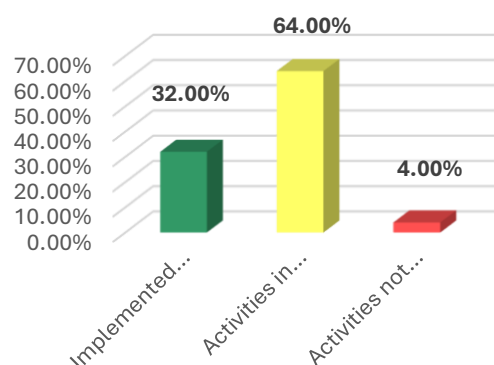


Chart 23. Degree of indicator achievement in 2025 for Strategic Objective V: Policy planning with and for citizens



Chart 24. Degree of activity implementation from the Action Plan 2025-2026 in 2025 for Strategic Objective V: Policy planning with and for citizens

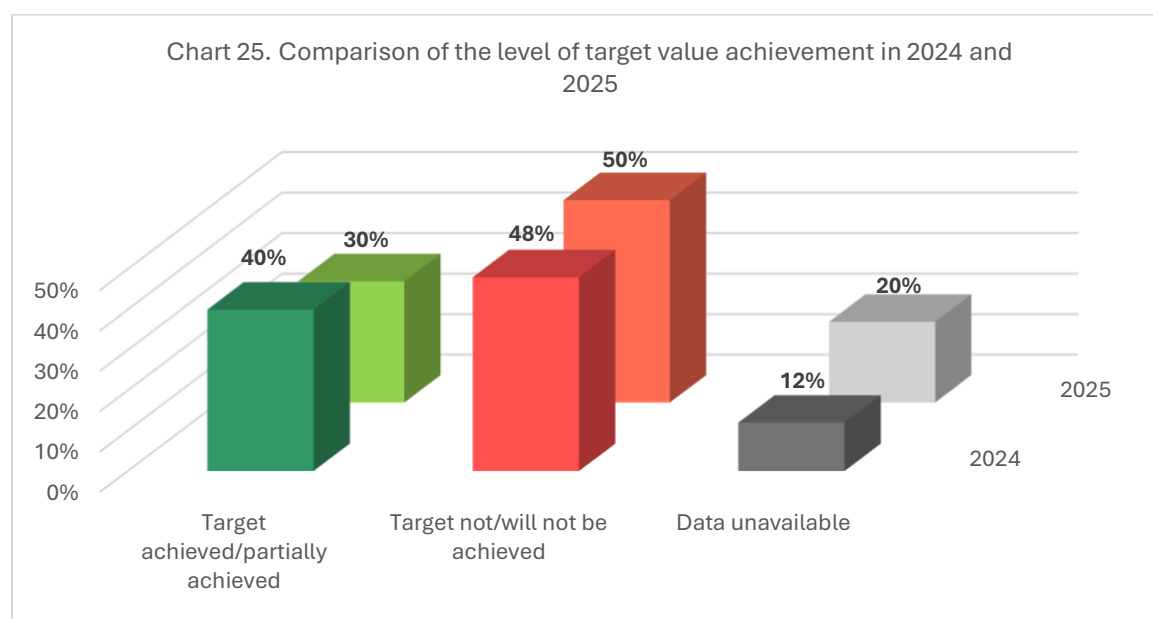


Regarding the achievement of the objectives of the Action Plan 2025–2026, focus group participants highlighted that the implementation of only 5% of activities had not been started during 2025, and that they expect the largest part of the activities to be realized within the planned period. On the other hand, it is noted that reporting on achieved indicator values is a challenge because there were only 12 ministries at the beginning of the Strategy's implementation, but due to government turnovers and institutional reorganisations, the statistics from the beginning of the Strategy's implementation and today are not fully comparable. Furthermore, respondents pointed out that it is impossible to influence the movement of certain performance indicator values (which, for example, relate to appeals or the initiation of proceedings before courts) because a large number of initiated proceedings/appeals affects the final results, even though significant efforts are being made through training sessions for staff in first-instance bodies to reduce the number of submitted appeals and thereby influence the achieved results.

The chart below presents a simplified comparison of the assessments of the achievement of performance indicator target values in 2024 and 2025⁴¹. The assessment was conducted by grouping, on one hand, the indicators for which target values were achieved and partially achieved in 2024, and on the other hand, indicators for which the 2026 target value was achieved in 2025 and indicators for which the achievement of the 2026 target value can be assumed (because the indicator values achieved in 2025 are very close to the 2026 target values), into the first two blocks. In the second two blocks, indicators that did not reach their target value in 2024 and indicators for which it can be assumed that they will not reach their target value in 2026 (because they have a negative trend or have a positive trend but are growing slowly) are grouped. In the third two blocks, indicators for which indicator values were unavailable in 2024 and 2025 are grouped. Before concluding what the chart shows, it must be borne in mind that this assessment is primarily based on data concluding with the end of 2025, although data collected during the evaluation process, i.e., concluding with the beginning of June 2026, were also taken into account. In the past six months, a lot has certainly been done, but all data will only be fully reviewable once the implementation for the entire year of 2026 has been reported on. The chart below indicates the possibility that the number of performance indicators that will not reach their target value in 2026 will increase compared to the end of 2024, i.e., that the number of indicators that will reach their target value at the end of 2026 will decrease compared to 2024 if the implementation of the Strategy does not accelerate significantly. The chart also shows a significant increase in the number of indicators for which values are unavailable in 2025 compared to 2024, highlighting the need to find a way for the 2026 report to contain data on as many indicators as possible. In any case, bearing in mind that 88 activities from the Action Plan 2025–2026 remain to be implemented for the year 2026, there is substantial room for improving results and overcoming the given projections regarding the achievement of performance indicator target values, provided that the dynamics of implementing the planned activities are accelerated. The assessment that 32% of the activities planned in

⁴¹ The chart below was created based on information from the 2024 and 2025 reports, as well as subsequently submitted data for the indicators "% of recommendations implemented by public administration bodies based on the Report of the Protector of Human Rights and Freedoms – Ombudsman", "Percentage of public policy consultations conducted in accordance with the legal framework and SIGMA principles in relation to the number of acts adopted by the Government that are subject to public consultations", "Percentage of laws where the Standard Cost Model is applied for RIA", and "Percentage of high-quality RIAs in relation to the total number of RIAs submitted for the opinion of the MoF". On that occasion, the "Percentage of high-quality RIAs in relation to the total number of RIAs submitted for the opinion of the MoF" exceeded the target value for 2026 (92.82% compared to 88%), while the indicators "% of recommendations implemented by public administration bodies based on the Report of the Protector of Human Rights and Freedoms – Ombudsman" and "Percentage of laws where the Standard Cost Model is applied for RIA" came very close to the target values for 2026, and can be expected to achieve them by the end of the year. The achieved value for the indicator "Percentage of public policy consultations conducted in accordance with the legal framework and SIGMA principles in relation to the number of acts adopted by the Government that are subject to public consultations" dropped compared to 2024 (from 64.46% to 25.37%), so it can be assumed that it will not reach the target value of 100% in 2026.

the Action Plan 2025–2026 have already been realized and that 63% of the planned activities were initiated in the first year of the current Action Plan is certainly encouraging.



According to the European Commission Montenegro Progress Report 2025, Montenegro has achieved limited to moderate progress in the area of public administration reform, with the note that it is moderately prepared for the application of the EU acquis in this field. Recommendations from the previous report remain valid, with a particular focus on strengthening the principles of merit-based recruitment, and improving transparency and free access to information. Additionally, SIGMA now assesses that progress has been made in the commitment to public administration reform in Montenegro, and that better results are expected by the end of 2026. Since the last SIGMA monitoring report, better coordination is observed between public administration reform and public financial management reform, as well as between public administration reform and aspects of digital transformation, alongside strides regarding the Government's Annual Work Programme and the Montenegro Accession Programme to the EU. Furthermore, results have also been noted in the civil service system, but the effects of structural reforms within the public administration are yet to be seen. In the upcoming period, particular attention should be dedicated to improving the consultation process during the drafting and adoption of regulations and strategic documents, and to enhancing the legislative process in general by reducing the number of regulations adopted through urgent procedures.

In the areas where effectiveness was high, which stakeholder measures contributed the most to this high effectiveness (driving forces/success factors)? In the areas where effectiveness was low, which stakeholder measures explain the lack of progress (constraining forces)? What unexpected positive and negative changes (if any) occurred, including those relating to cross-cutting/inter-ministerial issues, for all five objectives defined in the Strategy?

The most significant positive changes were recorded under Strategic Objective II: Citizens and businesses use high-quality public administration services. Within this strategic objective, prominent results relate to the number of digitalised services on the single portal within the areas defined according to the EU "eGovernment benchmark" methodology (32 in 2024 and 51 in 2025), as well as to the number of institutions in which a quality management system was introduced (11 in 2024 and 16 in 2025). In addition to the above, positive results were achieved in the section relating to citizen satisfaction with public services (the Balkan Barometer assigned a score of 4 in 2024, after scores of 3 and 2.8 were obtained in 2022 and 2023). A positive trend was also observed in the electronic linkage of registries (the number increased from 8 in 2021 to 16 in 2024 and 18 in 2025), although the target value of the indicator is unlikely to be achieved by the end of 2026 (50 is planned for 2026). The achievement of these results was primarily influenced by the implementation of activities relating to the introduction of the service quality management system, the establishment of the Catalogue of Services, IT system upgrades, and the linkage of registries. Within the quality system, the implementation of the Common Assessment Framework (CAF) model in 6 institutions was key, making the Ministry of Public Administration the first holder of the "CAF Effective User" label, while the formed Network of Quality Management Officials provided a framework for exchanging best practices. The upgrading of IT infrastructure through the introduction of the platform for digitalisation/automation of business processes (IBM-BPM Platform) and data integration (X-Road Platform) enables institutions to independently create complex electronic services and ensure secure data exchange, which, along with the drafting of 10 Guides for Administrative Procedures and an innovated Catalogue of Services, significantly simplified procedures for end-users. The process of linking registries led to the expansion of the SISEDE platform to 21 institutions and 215 registries, which enabled over 9 million queries in 2025.

These positive findings coincide with the opinion of the focus group participants regarding the significant results of the Strategy. Namely, focus group participants believe that activities in the field of digitalisation will be realized within the projected deadlines. Respondents emphasize that the development of electronic services (for example, electronic services in the field of education such as enrolment in kindergartens, primary and secondary schools, universities, student dormitories, student loan exemptions, recognition of diplomas, etc.) which have a high share of electronically submitted applications, as well as the improvement of interoperability and data retrieval

via the X-Road Platform, is of great importance for improving the efficiency of public administration and enhancing the user experience for citizens. The establishment of new electronic services intended for teachers and institutions (licenses, permits) is currently underway, which will have a positive impact on relieving the administrative burden, but also on the communication of the administration with citizens, the civil sector, and the private sector. Respondents from the local level also highlight results in the digitalisation of procedures, as well as the installation of eKiosks for reporting communal problems and communicating with citizens.⁴²

Strides have also been made under Strategic Objective V: Policy planning with citizens and for citizens. Specifically, as early as 2025, indicator values were achieved regarding the alignment of strategic documents with methodological rules, the implementation of evaluations for strategic documents, and the participation of ministry representatives within the Network of Civil Servants for Strategic Planning. The first two results are part of Operational Objective 5.1: Strengthening the data-driven planning system leading to the creation of sustainable policies and the achievement of Government priorities. Within this operational objective in the Action Plan 2022–2024, 8 out of 11 activities had already been realized, among which it is necessary to highlight those related to revising education programmes for strategic planning and organizing training, drafting an analysis on the implementation of evaluations for strategic documents, as well as preparing a manual for conducting evaluations and integrating evaluation and reporting findings into the new policy planning cycle. For certain results, such as establishing a network of coordinators for strategic planning, the network within the Commission for Monitoring the Government Work Programme was utilized, given that a good level of cooperation and synergy was achieved through the functioning of this commission. One of the major challenges remains linking medium-term planning with the budget, and modalities for connecting strategic and budgetary planning are currently being considered. In the section concerning consultations, respondents noted that ministries publish their work plans on the Government website to a limited extent, which is important for planning consultations; therefore, activities aimed at improving the work planning of ministries should be determined in the upcoming period.⁴³

⁴² On the other hand, in the preceding period, the PAR Monitor for 2024/2025 (<https://www.par-monitor.org/area-service-delivery-and-digitalisation/>) relating to the area of Service Delivery and Digitalisation, pointed out that citizen-centricity in practice was at a low level (36 out of 100 points). Some of the cited causes were: a lack of citizen involvement in the service (re)design process, the absence of channels for feedback on the services themselves on providers' websites, as well as a lack of focus on diverse access channels, which limited the adaptation of services to different user groups. Regarding digitalisation, it was noted that, despite the adoption of regulations required for digitalisation and activities concerning the digitalisation of procedures and service payments, the process was limited by obsolete information systems that were not user-friendly, as well as by insufficient digital literacy among service users.

⁴³ The aforementioned challenges within this strategic objective were also confirmed by previous analysis findings and a score of 41 out of 100 points - in the PAR Monitor 2024/2025, within the area of Policy Development and Coordination. As one of the problems, the PAR Monitor identified that although the

The smallest stride was made under Strategic Objective III: Professional public administration. Within this Strategic Objective, a negative trend was noted regarding the adoption of Personnel Plans of state authorities and local administration bodies, the number of candidates applying for job vacancies, the share of civil servants in state authorities who were evaluated, as well as the percentage of newly employed civil servants who completed training in their first year of work in entry-level official positions. These results were conditioned by delays in the implementation of activities related to the adoption of the Competency Framework, training for civil servants responsible for developing the Personnel Plan, linking personnel plans with the budget through the Central Personnel Records (CPR), improving inspection oversight over the data of the Human Resources Information System (HRIS), as well as abandoning the drafting of the civil service system analysis in public administration, the improvement of the reward system, and the advancement of digital skills. Namely, the drop in the number of adopted personnel plans from 86% in 2024 to a mere 53% in 2025 is a direct consequence of frequent administrative reorganisations and the entry into force of amendments to the Law on State Officials and Employees in August 2025, as these novelties required the urgent harmonization of acts on the systematisation of positions. At the local level, the situation remained unchanged because municipalities still do not adopt these plans through the CPR, while for public institutions, monitoring this indicator was impossible because regulations that would mandate this obligation do not yet exist. Additionally, the share of evaluated civil servants in 2025 amounted to a mere 35.77%, primarily because most authorities still conduct evaluations according to previous procedures, entering data into the system only retroactively. Finally, the annual implementation reports of the Strategy and Action Plans confirm that the drafting of the civil service system analysis, the improvement of the reward system, as well as the programme for the development of digital skills for employees in financial and legal services, were abandoned.⁴⁴

Government regularly published the agenda and almost all decisions (though not always within the legal deadline of 7 days), it did not publish the minutes from the sessions, and as many as 68.75% of sessions were conducted electronically. Excessive use of "confidential" markings and delays in publishing the agenda were also noted, which prevented public oversight. It is mentioned that annual plans, work reports, and EU integration reports were adopted regularly and timely, but in PDF format, and were not available on the national open data portal. It was also determined that the early stage of public consultations was conducted for only 4% of strategic documents and 5% of laws, while public debate was conducted in just 30.56% of cases for public policies and 40.65% for laws. The central e-Portal for public debates was poorly utilized, and the institutions themselves did not promote the digital submission of comments, instead mostly directing citizens to postal mail and e-mail.

⁴⁴ In the PAR Monitor for 2024/2025, in the area relating to the Civil Service and Human Resource Management, the findings of the analysis and the overall score (24 out of 100 points) pointed to systemic problems in practice within this area of public administration reform. The lack of a comprehensive human resource plan, which should contain all data on the civil service system at the state administration level and improve transparency, was identified as a key shortcoming. The absence of limitations regarding engagement under temporary service contracts (contracts for work) was also identified, leading to a high share of this type of engagement without substantive justification. It was assessed that there was a lack of transparency in the recruitment process and that regulations only minimally ensured openness, while the application procedure imposed a heavy administrative burden because most documents from state

A moderate stride was achieved under Strategic Objective I: Organisation and operation of public administration in the function of citizens' needs. Although measurable results were achieved in the modernisation of work and the financial stabilization of municipalities, key mechanisms of oversight and administrative efficiency record stagnation or regression. On the side of positive achievements, the greatest progress was made in the area of digitalisation of internal processes. With the establishment of the new eDMS/eSV system, the percentage of authorities using this tool rose from 38% to 63%, while 55% of authorities exchange documents exclusively electronically (already exceeding the 2026 target value of 40%). Furthermore, a positive trend was also recorded in the delegation of authority for financial management, from 8.3% to 56%. This progress was achieved through the implementation of training sessions for managers on managerial accountability and delegation, alongside the adoption of a new legislative framework (the Law on Management, Internal Control, and Internal Audit was adopted in 2025) and a roadmap for implementing the concept of managerial accountability, which was crucial for closing negotiating chapter 32. At the level of local self-governments, an exceptional result was achieved in reducing municipal debt relative to their total revenues, which dropped from the baseline 33.5% to 9.45% in 2025. This financial stabilization occurred due to the introduction of enhanced supervision by the Ministry of Finance over municipal budgets, and the active work of the Budgetary Inspection in controlling outstanding liabilities. On the other hand, negative trends and challenges are evident regarding the work of the Administrative Court, as the average duration of a labour dispute was extended from the baseline 17 months to as many as 26.3 months (791 days) in 2025, due to a high influx of cases, but also the finalization of cases from previous years. Simultaneously, a large increase was recorded in the amount of funds forcefully collected in cases represented by the Protector of Property and Legal Interests, from the baseline 10.4 million to 23.7 million € in 2025, representing a serious burden on the state budget. The efficiency of the Administrative Inspection remains limited due to insufficient capacities, while exercising oversight over the work of public services is prevented due to the current organizational structure and the lack of a methodology for conducting oversight. The entire reform of this segment is additionally burdened by delays in the adoption of the Law on the Government and the Law on Public Institutions, and frequent government reorganisations that caused discontinuity in work and a constant need for amending acts on the systematisation of positions.

registries were not obtained ex officio. Furthermore, it was noted that, since mid-February 2024, the practice of publicly publishing test results has been discontinued, causing a negative perception of the recruitment process in public administration. The salary system was assessed as extremely complex; collective agreements lacked pre-defined limits for most allowances, the variable part of the salary was not linked to performance appraisal, and salary scales and average salaries by public administration categories were not publicly accessible to citizens.

A moderate stride was achieved under Strategic Objective IV: Transparent and open public administration. Measurable progress was made here in terms of legal certainty and data availability, but systemic deficiencies in responsiveness continue to slow down the full realization of the reform. On the side of positive achievements, the most significant progress was made in the quality of decision-making by the AZLP, whose percentage of decisions overturned by the Administrative Court dropped drastically from the baseline 42.17% to a mere 0.098% in 2025. This exceptional result was achieved through intensive professional development of the AZLP's staff and the strengthening of the legal validity of its decisions, with continuous expert support from SIGMA. Furthermore, the new Law on Free Access to Information was adopted in December 2025, harmonizing the national framework with EU regulations and international conventions. In the area of open data, technical and functional upgrades to the data.gov.me portal led to an increase in the number of available datasets to 675, along with the publication of the first 10 high-value datasets with API access. Finally, the share of authorities registering requests for free access to information in the information system increased from 1,347 to 2,012, which is a direct consequence of strengthened institutional practices in recording and tracking requests. On the other hand, negative trends and challenges are evident, primarily in the segment of "administrative silence," where the share of approved appeals on this ground rose to 29.46% instead of decreasing (the baseline value was 23.15%). The reason for this trend is the frequent failure of public authorities to meet statutory deadlines, which confirms the need for stronger administrative discipline. A serious limitation to the reform is also the abuse of the right to free access to information, which drastically burdens the capacities of the AZLP and the Administrative Court due to the submission of a large number of repetitive requests and appeals on the same topic. It was also noted that, despite the existence of the information system for free access to information, its utilization remains insufficient due to low proactivity among authorities. Furthermore, the establishment of the Council for Free Access to Information was prolonged to the end of 2026, as the necessary legal and organizational framework for its operation has not yet been established. Although the number of datasets on the portal is growing, the participation of institutions in publishing data remains minimal at just 3.38%, primarily due to a lack of internal capacities and the unwillingness of authorities to adapt procedures to machine-readable formats. Finally, the AZLP abandoned the drafting of the Communication Strategy, while the linkage of the appeals procedure with the IT system was not realized due to a lack of budgetary resources.⁴⁵

⁴⁵ In the PAR Monitor 2024/2025, within the area of Transparency and Inclusiveness of Public Administration Reform Development and Management, it was scored low (24 out of 100 points). Such a low score was justified by the lack of early consultations and public participation during the drafting of the Public Financial Management Reform Programme 2022-2026 and the Action Plan 2024-2025 for the Digital Transformation Strategy 2022-2026, for which formal working groups had not been formed, as well as by an unsatisfactory level of transparency in monitoring the Public Administration Reform Strategy due to the limited

As significant causes for the failure of certain aspects of the public administration reform, focus group participants cite staffing changes, because in a large number of cases, this meant that the implementation of particular activities had to start from scratch. Furthermore, shifts in staffing brought about changes in priorities, with new plans becoming the priority. Respondents also state that a large number of activities required legislative amendments, which were hindered due to government turnovers; consequently, the delay in adopting laws conditioned delays in adopting the bylaws necessary for their implementation, all of which negatively affected the effectiveness of the Strategy and Action Plans. Finally, for the implementation of certain activities that require the involvement, cooperation, and coordination of other ministries and authorities (especially regarding implementation and reporting on achievements), political support and the involvement of higher management levels and decision-makers are needed to ensure that the activities are realized.

To what extent have the accessibility and quality of service delivery been achieved? How does Montenegro rank in terms of the digitalisation of service delivery compared to the best practice of service delivery system digitalisation in previously selected EU countries?

The Public Administration Reform Strategy 2022–2026 identified the problem of insufficiently efficient service delivery, stating that administrative services encompass excessively bureaucratic, expensive, and time-consuming procedures that directly affect their quality and user satisfaction. The findings showed that in 2020, there were over two million cases within the operations of public authorities, with significantly lower efficiency at the local level (the percentage of unresolved cases amounted to 15.51%) compared to the central level (where the percentage of unresolved cases stood at 4.01%), as well as high legacy percentages of first-instance decisions overturned by second-instance bodies (52.06% at the central level and 39.39% at the local level). Furthermore, it was noted that authorities exchanged data from official records with each other to an insufficient extent, which adversely affected the efficiency and economy of the procedure, and consequently, the ability of parties and other participants in the administrative procedure to exercise their rights and legal interests more easily and effectively. It was assessed that citizens spend too much time to access the services they need, and that only a small number of citizens manage to complete a service during their first visit to the competent institution.

In addition to the above, a technically more complex problem was observed regarding the lack of full electronic data exchange between key electronic portals and the IT infrastructure. Specifically, there is no full integration between the

involvement of non-governmental sector representatives in the work of the Public Administration Reform Council, whose sessions are strictly time-limited.

eGovernment Portal, the eDMS, the electronic payment system, and the electronic identification and authentication system. The Strategy noted that within state administration bodies, there are over 100 non-networked information systems, and that the majority of the 524 services on the eGovernment portal were at a low level of sophistication (157, i.e., 30% were at level 3, and only two services were at level 4), because high-level services are not technically feasible without the automated exchange of data from core registries.

Improvement in the area of services was planned through Strategic Objective II: Citizens and businesses use high-quality public administration services, which is divided into two operational directions. Operational Objective 2.1 focused on more efficient service delivery and the introduction of quality management, which encompassed the adoption of the Roadmap for Quality Management in the Public Administration of Montenegro 2023–2026 and the implementation of the European CAF. The CAF model was successfully implemented in the Ministry of Public Administration, which, as previously mentioned, became the first institution in Montenegro with the "CAF Effective User" label, as well as in the Bureau of Metrology and the Municipality of Zeta. Additionally, the ISO 9001 standard was established in six authorities, while the BFC SEE (Business Friendly Certification) programme was introduced at the local level. In addition to the above, 10 Guides for Administrative Procedures were drafted. Furthermore, the Network of Officials for Quality Management in Public Administration was formed for the permanent exchange of best practices. Operational Objective 2.2 is aimed at the full interoperability of information systems and the development of e-services with a high level of sophistication. The focus was placed on creating a new single eGovernment Portal based on the "once-only" principle, which integrates systems for e-payment, e-authentication, and e-identification. A national Certification Authority (GovME CA) was established, enabling the use of qualified electronic signatures and seals, which is linked to the new system for electronic management of documents and Government sessions (eDMS/eSV). The implementation of the "Montenegro Digital" project standardized technological processes at the Government level. For process automation and data integration, the IBM-BPM platform (which enables the creation of complex electronic services for citizens and businesses) and the X-Road platform (which ensures secure data exchange between the information systems of different organizations) were implemented. All of this enabled the Single Information System for Electronic Data Exchange (SISEDE) to expand to 21 institutions and 215 registries, alongside the signing of the Agreement on Inter-Municipal Cooperation to connect local self-governments to this system.

The introduction of pilot digital services under Strategic Objective II, particularly the eStudent platform, revealed a level of digital readiness and literacy among users that significantly exceeded initial assessments. The results showed that citizen trust in the functionality and security of digital solutions grew at an unexpected pace, which is

confirmed by the fact that as early as the first year of implementation (2022), as many as 85.34% of students immediately switched to electronic university enrolment. This trend of exceptionally high adoption continued in the subsequent years, reaching a rate of 86.14% in 2023 and 2024, while a similar success was recorded with online applications for accommodation in pupil and student dormitories, with a rate of 84.7% in 2022. This massive shift to digital channels, further supported by innovations such as the digital signing of contracts between students and the University via the new electronic ID cards, clearly indicates that younger generations and citizens are ready for the concept of paperless administration as soon as stable and user-oriented services are offered to them. Nevertheless, this pronounced success of the pilot eStudent service simultaneously serves as an indicator of high public expectations, but also as an incentive for faster development of other electronic services.

A stride was also made in the number of digitalised services (51 in 2025) and their sophistication. This is a result of the implementation of the IBM-BPM platform for process automation and the X-Road platform for secure data integration. The establishment of the GovME CA certification authority enables the mass use of e-signatures, which, along with integration with the new eDMS/eSV system, created the conditions for "paperless" operations at the Government level. Alongside these technical achievements, the quality of work was systematically upgraded through the introduction of quality management standards, whereby the number of institutions with CAF, ISO 9001, or BFC SEE standards rose from zero to 16 in 2025, already exceeding the five-year strategic target. An additional contribution to the standardisation and transparency of provided services was achieved through the drafting of the Catalogue of Services and 10 Guides for Administrative Procedures, which made the procedures clearer and closer to user needs. However, the slower growth in linking registries (18 pairs out of the targeted 50) was caused by the absence of stronger inter-institutional cooperation and the existence of legacy software in authorities that does not support modern exchange standards. The cyberattacks from 2022 further slowed down the reform, causing the loss of documents in progress and the redirection of resources toward infrastructure recovery. Horizontal barriers still consist of a shortage of digital skills among employees and a high dependence on external IT vendors, which slows down the agile development of new services.

Progress in digitalisation is significant. According to the Strategy and Action Plans, progress is monitored through indicators that measure technical readiness and the level of service sophistication. Relevant performance indicators for specific operational objectives within Strategic Objective II are presented in the table below. Performance indicator target values that have already been achieved for specific operational objectives are highlighted in green, which speaks to exceptional progress. The target values set for the end of 2024 were achieved in line with deadlines for 4 out of 6 total performance indicators. The target values set for the end of 2026 were already

achieved during 2025 for 2 indicators. There are three indicators for which it has not been possible to determine the achieved values so far, and 1 indicator whose value was not achieved by the end of 2025.

Table 2.

Operational Objective.	Performance Indicator	Baseline (2020/21)	2022.	2023.	2024.	Target 2024.	2025.	Target 2026.
OO 2.1	Number of institutions in which a quality management system has been introduced	0	1	1	11	5	16	15
OO 2.1	Citizen satisfaction with public services (Balkan Barometer)	2,9	3	2,8	4	3,5	N/A ⁴⁶	3,7
OO 2.1	Percentage of administrative acts overturned by the Administrative Court	20,33%	28%	N/A	N/A	20%	N/A ⁴⁷	18%
OO 2.2	Number of digitalised services on the single portal according to the EU "eGovernment benchmark" methodology	0	0	0	32	10	51	20
OO 2.2	Percentage of electronically submitted applications for the use of the pilot service (eStudent)	0	85,3%	86,14%	86,14%	15%	N/A ⁴⁸	45%
OO 2.2	Number of pairs of electronically linked registries in the metaregistry	8	12	16	16	30	18	50

Attention should be drawn to the fact that the achieved values of the performance indicator on Citizen Satisfaction with Public Services from the Balkan Barometer data, i.e., citizens' perception of satisfaction with public services, cannot be monitored starting from 2025. Within the 2022 Balkan Barometer measurement, Montenegro had an indicator value of 3.1 in the section of public administration service delivery. In 2024, a significant leap in citizen satisfaction was recorded, reaching a score of 4, which exceeds the previously set national targets of 3.5 for that period. The Balkan Barometer changed its methodology and abolished the indicator that measured the level of citizen satisfaction with public administration services, also removing the previous grading scale from 1 to 5. Instead of assessing satisfaction with the services themselves,

⁴⁶ Data from the Balkan Barometer for 2025 are not available.

⁴⁷ Data on annulled acts are missing because the Draft Report on the Implementation of the Law on Administrative Procedure for 2023 and 2024 is awaiting adoption.

⁴⁸ Aggregate data for the pilot services in 2025 are not displayed because the services are located on different platforms, which prevents aggregate tracking. Although the monitoring of four services was planned (eEmployment, eStudent, eProfessional Exam, and eNGO), the reports display data exclusively for eStudent because the other services were either not developed during that period or were at the very beginning of their functionality.

the latest report focuses exclusively on measuring trust and confidence in the institutions that lead these sectors. Due to this conceptual change, but also because of the need to establish a system for measuring user satisfaction with services in Montenegro as the only sustainable way of measuring in this area, satisfaction data from previous years will not be methodologically comparable with the new trust data.

Focus group participants expressed the opinion that there has been an improvement in the quality and accessibility of services to users, and that public services correspond more to the needs of users, in line with the ranking within the Balkan Barometer. However, respondents emphasize that certain services (e.g., tax services) are not integrated into the new eGovernment portal, and that there is no central monitoring of user satisfaction with services. Furthermore, comprehensive data on user satisfaction with traditional services are lacking, which hinders insight into the actual situation in this field.

Finally, the UN eGovernment Survey across different countries should also be borne in mind. This 2022 survey showed that Montenegro occupied the 71st place on the global list of e-government development. However, in the latest United Nations report for 2024, Montenegro records a drop on the global ranking list by 10 positions and is now ranked 81st out of a total of 193 countries in the world.⁴⁹ Its overall E-Government Development Index (EGDI) stands at 0.7211, which places it in the group of countries with a high level of digital development (High EGDI), but not a very high one.

⁴⁹ <https://publicadministration.un.org/egovkb/en-us/Data/Country-Information/id/114-Montenegro>

In the publication "White Book – Investment Climate in Montenegro 2025" by the Foreign Investors Council in Montenegro, the Public Administration Efficiency Index was evaluated for the first time, which is stated to assess the performance of public administration through the functioning of institutions, the degree of efficiency, equal access for all users, and implemented reforms. In 2025, the index value amounted to 4.8, with the White Book pointing to a low level of public administration efficiency. At the same time, areas where additional action is necessary to improve the quality of public services are identified. Thus, "knowledge and capacity of the administration" was evaluated with a score of 4.0, while a score of 4.1 was given for the areas of "quality of services," "public administration costs," "implementation of reforms," "inter-institutional cooperation," and "equal treatment of users." For "accessibility and speed of services," the assigned score was 4.2.

Furthermore, the White Book stated that it is "necessary to improve access to services for citizens and the economy, increase the transparency and predictability of the work of institutions, introduce innovative digital solutions, ensure equal access for all users, and that it is crucial to accelerate the alignment of domestic procedures and legislation with international standards in order to strengthen trust in institutions and create a more stable legal framework that supports long-term economic development and European integration of Montenegro."

As other factors influencing the assessment of public administration efficiency in Montenegro, the White Book cites:

- Lack of institutional memory due to frequent political influences on the administration itself;
- Insufficient expertise of employees in public administration, which leads to differing interpretations of legal solutions by the administration for the same procedures;
- Slowness and insufficient efficiency of public administration regarding the resolution of requests from the business community;
- Insufficient orientation of employees toward meeting the needs of end-users, i.e., citizens;
- Insufficiently developed electronic government services, which additionally slows down the process of obtaining certain documents, licenses, and the like;
- The absence of a system for evaluating competencies, work quality, and achieved results of employees in the public sector.

Source: "White Book – Investment Climate in Montenegro 2025", Foreign Investors Council in Montenegro, <https://mfic.me/wp-content/uploads/2025/11/MFIC-Bijela-knjiga-2025-CG-web.pdf>

Conclusion on Effectiveness

The effectiveness of the public administration reform in the observed period can be assessed as moderate, with a clearly pronounced asymmetry in achieving results between technical-operational improvements and substantive systemic changes.

The highest degree of effectiveness was achieved in the areas of digitalisation, where indicators were met relating to the introduction of the eDMS system in public administration bodies (growth from 38% to 63%), the share of authorities electronically

exchanging documents (from 0% to 55%), the number of institutions in which a quality management system was introduced (from 0 to 16), the number of e-services on the single portal (51 e-services), as well as the share of applications submitted electronically. A significant stride was also made in the area of evidence- and data-based drafting of regulations and policies, where the percentage of strategic documents for which an evaluation was conducted rose to 80% in 2025, and the percentage of high-quality RIAs relative to the total number of RIAs reached 92%, indicating an established practice of monitoring policy performance based on data. At the local level, an exceptional result was achieved in reducing municipal debt, which fell from the baseline 33.5% to 9.45%.

The reform was less effective in areas that directly affect the legal certainty of citizens and the professionalisation of officials. Key bottlenecks remain the alarmingly prolonged duration of administrative disputes (from 17 to 26.3 months), and the volume of "administrative silence" where the share of approved appeals on this ground rose to 29.46%, which generated a massive influx of lawsuits and millions in budgetary costs due to forced collection. Effectiveness in the area of human resources management was limited, as illustrated by the drop in the evaluation rate of officials (a decline from 46.6% in 2022 to 35.77% in 2025), the percentage of state authorities and local administration bodies that drafted a Personnel Plan of improved quality through the CPR (a decline from 82% in 2022 to 53% in 2025, while throughout this time the value for local administration bodies remained at 0%), as well as the low average number of candidates per job vacancy (2.67 in 2025, which is significantly below the target value of 6 candidates at the end of 2026). This outcome was influenced by external and systemic factors, primarily the 2022 cyberattacks, which temporarily paralyzed the digital infrastructure, and frequent government reorganisations (from 12 to 25 ministries) that caused a slowdown in activity implementation and the constant postponement of functional analyses.

The overall effectiveness to date has been assessed as partial. The relatively low implementation rate of activities by the end of 2024 (54.64% implemented, 18.58% initiated, 26.78% of activities not started) correlates with the low achievement of performance indicator target values at the level of operational objectives in 2024 (34% of performance indicator target values were achieved, 48% of performance indicator target values were not realized). The assessed level of implementation of planned activities in the Action Plan 2025–2026 by the end of 2025, showing that 32% of activities were realized, 63% of activities were initiated, and implementation had not started for only 5% of activities, provides hope that the activity implementation rate at the end of 2026 can be higher than that at the end of 2024. When it comes to the assessments of achieving performance indicator target values by the end of 2026, the 2026 target value for: 24% of indicators has already been achieved, for 6% it will most likely be reached, for 24% it can be assumed that it will not be reached (given that the trend is estimated not to be rising fast enough to achieve them), for 26% a negative trend or stagnation has been recorded so far, which significantly reduces the possibility of reaching the target value,

for 18% it is not possible to assess the possibility of reaching the target value, while 2% of indicators are monitored through another indicator. The possibility that the number of performance indicators that will not reach the target value will be higher at the end of 2026 compared to the end of 2024, i.e., that the number of indicators that will reach the target value at the end of 2026 will decrease compared to 2024, points to the necessity of significantly accelerating the implementation of the Strategy, namely the planned activities, in the remaining period of the Strategy's validity. Furthermore, the significant increase in the number of indicators for which the value is unavailable in 2025 compared to 2024 indicates a need to find a way for the 2026 report to contain data on as many indicators as possible, in order to ensure the measurability of the progress achieved.

4.3. Efficiency

Were the capacities for the coordination and monitoring of the implementation of the Strategy and its Action Plans adequate? To what extent did the institutions create and incorporate into their plans and systems the necessary feedback loop and monitoring mechanisms that will ensure self-renewal (adaptation) in order to achieve the goals?

Capacities for the implementation of planned activities are partially adequate. This is demonstrated by the implementation rate of activities from the first Action Plan 2022–2024 (out of a total of 183 planned activities, 100 activities were realized, the implementation of 34 activities was ongoing, the implementation of 49 activities had not been started, and out of those, 14 activities were abandoned). Bearing in mind that only one year has passed since the beginning of the implementation of the Action Plan 2025–2026, it is not possible to assess the activity implementation rate to date with certainty, but 32% of realized activities and 63% of initiated activities in the first year are encouraging. It remains to be seen what the implementation rate will be by the end of 2026 and to review it in relation to implementation capacities.

On the other hand, as already mentioned, reporting against performance indicators causes concern, given that the share of indicators for which achieved values were not reported increases from year to year. Namely, the 2025 report states that values were unavailable for 28% of indicators, while an analysis of all reports drafted so far indicates that as many as 32% of indicators were not reported on in at least one year of the Strategy's implementation. All of the above contributes to a decrease in the efficiency of the reform.

In addition to difficulties in reporting on the degree of achievement of performance indicators at the level of operational objectives, difficulties were also observed regarding reporting on financial resources spent by activity. According to data from the 2024 report, out of a total of 183 activities provided for by the Action Plan 2022–2024,

financial resources were planned for 175 (96%) activities, while for 8 (4%) activities it was estimated that they would not require additional funds. However, at the end of 2024, for 23 activities for which financial resources had been planned, the realization of planned funds was not reported (Annex 4 presents a detailed table containing these activities, the operational objectives to which they belong, and the planned financial resources from the Action Plan 2022–2024). In the Action Plan 2025–2026, out of a total of 129 planned activities, funds were planned for the realization of 108 of them, whereby the 2025 report displayed fund expenditure for 27 activities (of which 15 were realized and 12 were ongoing). All of this points to significant difficulties in reporting, not only regarding the achieved values of performance indicators at the level of operational objectives but also regarding reporting on spent financial resources, which has a dual negative impact on the possibility of adequately monitoring achievements. Finally, focus group participants pointed to the problem of indicator passports, where difficulties were noticed in determining the degree of goal achievement based on indicator reporting (for example, with the indicator counting institutions that electronically exchange data, it is not clear whether all necessary data are being exchanged). It was also pointed out that some indicators are process-oriented in nature, which is why, even when they are realized, positive results and outcomes are not visible to citizens.

An example of good practice highlighted during the focus groups, regarding the way in which the collection of necessary data on the implementation of the Strategy and the current Action Plan can be coordinated in an efficient manner, relates to reporting on the implementation of consultations, as contact points have been established within ministries with the task of reporting and providing data on the consultations conducted in each of the authorities.

Coordination of implementation, monitoring, and reporting on achievements

The coordination system for the implementation of the Strategy and the current Action Plan, as well as the monitoring and reporting on achievements, has been established at multiple levels; however, an optimal coordination system that fully meets the needs of monitoring the public administration reform has not yet been shaped. Namely, the objective of establishing coordination mechanisms was to ensure the efficient implementation of planned activities, the achievement of set goals, and the tracking of progress through regular, comprehensive, and adequate implementation reporting. The first, hierarchically highest, and political level of coordination is represented by the Public Administration Reform Council. The Council has met more frequently recently (3 sessions in 2025), which has definitely had a positive impact on the implementation of the reform. The significance of the Council is also recognized by officials from both the central and local levels who participate in the implementation of

the Strategy and Action Plan, monitoring, and reporting on achievements. Focus group participants highlighted the importance of the Council's existence, as it provides political support needed to achieve the goals envisioned by the Strategy. Coordination teams established to coordinate implementation, monitoring, and reporting on achievements within each of the strategic objectives represent the second, administrative level of coordination.

Nevertheless, the coordination system for the execution of the Strategy and implementation reporting has undergone changes in the previous period, as the monitoring and reporting process showed that the mechanisms used so far were not entirely adequate. This was also confirmed in the 2024 SIGMA monitoring report. Some of the causes included insufficiently clear cooperation procedures and fragmented actions by individual portfolios, which resulted in a significant number of indicators for which reporting is absent. Furthermore, an analysis of the coordination structures used so far indicates that each setup had its advantages and disadvantages, but an optimal solution has not yet been found—one that would equally activate and focus both the political level, i.e., the decision-making level, and the technical-operational level in institutions responsible for implementing activities and reporting on achievements.

Therefore, and taking into account the recommendations of the State Audit Institution (SAI), a single Coordination Team was ultimately established to replace the cumbersome structure of six coordination teams that previously covered the 5 strategic objectives and the organization of local self-government operations, thereby improving communication and coordination. The Coordination Team currently consists of senior management staff, who are expected to coordinate policies in line with their competences and issue directives to lower, operational levels. In addition to the existence of this single Coordination Team, focus group participants state that a great deal of information is conveyed through informal communication at the operational level; during the drafting and implementation of the Strategy and Action Plans, contacts were established among officials from different institutions, and this definitely improves overall coordination. On the other hand, focus group participants stated that the frequent turnover of managers and decision-makers slowed down data collection. A problem was noted regarding the lack of clear induction guidelines for new managers, which would specify what is expected of them, what obligations they assume, and how they should execute them.

Regarding cross-sectoral cooperation between authorities at the central level, as well as between the central and local levels, focus group participants expressed differing views on implementation coordination. Some officials stated that cooperation between institutions in the process of implementing activities is fragmented, and that institutions often deal only with their own tasks without interest in developments across the entire administration (a "silo effect" was observed). There is also a perception among authorities that the central-level institutions establishing

standards (such as the Ministry of Finance, Ministry of Public Administration, Human Resources Management Authority, General Secretariat of the Government, etc.) are also responsible for their implementation, instead of it being clear that the obligation of implementation rests with the authorities themselves. Cooperation is, however, better on issues where a common interest of institutions is recognized. All focus group participants particularly emphasized the excellent cooperation with the Ministry of Public Administration. Regarding cooperation in the activity implementation process between the local and central levels, focus group participants from municipalities highlighted the problem of lacking precise information on which competent state authorities possess which data and registries, which puts them in a position to spend a lot of time on data retrieval (especially during service delivery and service digitalisation). On the other hand, positive examples of cooperation between the municipalities themselves were highlighted, in the form of sharing equipment for establishing electronic services and retrieving data from the central level.

In its 2024 monitoring report, SIGMA stated that formal monitoring and reporting were functional, but that there were deficiencies in coordination at the administrative level. This was later confirmed through delays in the preparation and publication of annual reports on the implementation of the Strategy and Action Plans. Specifically, the implementation reports of the Strategy for 2024 and 2025 were drafted in March of the year following the reporting year, unlike the reports for 2022 and 2023, which were drafted in May. This was one of the reasons for the significant increase in the share of indicators for which reporting was absent, as the reports serving as sources of verification for the indicators had not been completed during the report preparation period. The aforementioned limits the usefulness and relevance of information for the purposes of managing the reform implementation and monitoring achievements, as well as for the purpose of taking corrective measures in case they are needed.

Based on the analysis of the implementation reports of the Strategy and Action Plans, it can be concluded that institutions in Montenegro have established and incorporated certain monitoring and feedback mechanisms, although their effectiveness varies across levels and strategic objectives. The main monitoring mechanism falls under the competence of the Ministry of Public Administration, specifically the Directorate for Strategic Planning in Public Administration, International Cooperation, and IPA Funds. During 2024 and 2025, Coordination Teams for monitoring the reform were formed and upgraded, serving as administrative-operational bodies responsible for analyzing and assessing activity implementation. However, despite the new Coordination Team established at the end of 2025, the level of coordination is not fully satisfactory.

Regarding the capacities for coordination and monitoring, focus group participants stated that they have limited capacities which they try to utilize to the maximum

extent. They pointed out the necessity of planning an increase in existing capacities for implementation, monitoring, and reporting in the future period, particularly within central institutions in charge of implementing the Strategy and Action Plans, including the General Secretariat of the Government, the Ministry of Public Administration, the Ministry of Finance, the Administrative Inspectorate, the AZLP, the Human Resources Management Authority, etc. Respondents state that it is possible to engage consultants as external associates when donor funds are available, but obtaining the approval of the Ministry of Finance is required to hire new staff.

Although mechanisms for coordination, implementation monitoring, and reporting on achievements are incorporated into the regular work processes of the competent institutions, the Strategy and Action Plans implementation reports, as well as the findings from the focus groups, point to certain obstacles in the monitoring and reporting process. Frequent organizational changes and reorganisation of the Government led to discontinuity in strategic management and hindered the execution of functional analyses that were supposed to serve as the baseline for optimization. Furthermore, evaluation findings are sometimes not utilized to their full extent for the subsequent planning cycle due to the weak capacities of officials for analytical reporting. Finally, cyberattacks on the infrastructure temporarily paralyzed IT monitoring tools, such as the reporting system for the medium-term work programmes of ministries (ISPI), which slowed down the process of exchanging information vital for planning.

The implementation of the CAF model represents the most direct example of a mechanism for the adaptation of institutions to the requirements for higher implementation efficiency and higher-quality reporting, thereby aligning the work of the administration with the needs of citizens and the economy. This model is based on self-assessment and the identification of recommendations, which are subsequently implemented through work process improvement plans. By the end of 2025, the number of institutions with an introduced quality management system (CAF, ISO, or BFC SEE) rose to 16, creating a framework for the continuous measurement of performance and the identification of areas for improvement. In addition to the above, one of the adaptation factors is the practice of evaluation, which allows the findings on implemented policies to be incorporated into new planning cycles. The percentage of strategic documents for which an evaluation was conducted increased significantly (from 31% in 2022 to 80% in 2025), representing a foundation for creating results-based policies. The establishment of the RIA implementation system for bylaws and the enhancement of capacities for conducting the RIA process and drafting high-quality RIA reports accompanying draft regulations should be viewed in the same manner, ensuring that new regulations are adopted based on evidence and data.

Were the objectives and activities of the two Action Plans for the Strategy achieved on time, what are the main factors and causes that influenced potential delays, and how were they resolved?

Within Strategic Objective I: Organisation and operation of public administration in the function of citizens' needs, the failure to achieve the planned performance indicator target values and delays in the implementation of reform measures are evident. The failure to achieve the performance indicators and implement activities was decisively influenced by government turnovers and the subsequent reorganisation of authorities, which caused a slowdown in activity implementation and directly delayed the adoption of the Law on Public Institutions and the Law on the Government. Among the more significant activities, the upgrade of the IIS system with a self-assessment module, which would enable businesses to fill out inspection checklists themselves, was not realized due to changing priorities following the introduction of new inspections into the system. Negative trends in the indicator for the duration of administrative disputes were caused by an influx of new cases, while delays in improving the inspection system resulted from a shift in priorities due to the need to integrate new inspections into the system. These challenges were addressed through the new Action Plan 2025–2026, which provides for the intensification of regulatory work on backlogged laws, enhanced delivery of training sessions for officials (administrative procedure, open data, and free access to information), and the expansion of the eDMS system to new authorities to digitalise and accelerate administrative processes.

Within Strategic Objective II: Citizens and businesses use high-quality public administration services, a high level of effectiveness was achieved, with indicators largely exceeding planned expectations, particularly in the segment of digital infrastructure and quality management. Key success factors and reasons for achieving such good results relate to the focus on digitalisation and the subsequent growth in the number and quality of digital services. This result was achieved by launching the new eGovernment Portal based on the "once-only" principle, implementing the IBM-BPM and X-Road platforms that automated processes and ensured secure data exchange, as well as expanding the Single Information System for Electronic Data Exchange (SISEDE). Furthermore, a stride was made in introducing the quality management system, where the number of institutions with introduced standards (CAF, ISO, or BFC SEE) increased, and the Network of Officials for Quality Management was established to provide mentorship to other authorities. Despite the overall success, delays and challenges are evident regarding the full functionality of pilot e-services, with the main reasons being legacy software solutions, non-networked systems, a lack of internal capacities, and dependence on external vendors when it comes to digital service development. Additionally, the IT audit and the development of the audit planning module were postponed to the second half of 2026 due to staffing and organizational changes in the competent department within the ministry. These challenges are being resolved through

the Electronic Services Implementation Plan 2025–2027, which envisions the development of another 171 services (57 realized in 2025), securing technical prerequisites for e-delivery, as well as through the development of the eAcademy, which will unify programmes for digital skills and cyber security.

Within Strategic Objective III: Professional public administration, a low level of fulfilment of the planned performance indicator target values was achieved, and a delay in the implementation of reform measures was observed. Key failure factors and reasons for delays in this segment of the reform relate to frequent reorganisations and changes in the composition of the Government, which prevented the completion of functional analyses, as the planned organizational models became obsolete before the process could be finalized. Frequent reorganisations also influenced the decrease in the share of evaluated civil servants (from the baseline 63.38% to 35.77% in 2025). Furthermore, a drop was observed in the adoption of personnel plans (from 86% in 2024 to 53% in 2025) due to the legal vacuum created after the adoption of the new Law on State Officials and Employees, while for public institutions there is still no legal obligation for this activity. One of the most significant unrealized activities is the development of an online application system for job vacancies within the Human Resources Management Authority. Although planned from the beginning of the reform, implementation was postponed to the end of 2026 due to the need for technical upgrades to the system for checking abilities. In addition to the above, due to continuous organizational changes conditioned by government turnarounds, there was a delay in drafting the phased analysis of public administration functionality, which was supposed to encompass internal work processes, public administration efficiency and accountability, personnel policy, the number of employees, etc. This activity in the Action Plan 2025–2026 was replaced by a more modest activity of drafting functional analyses in public administration regarding the number of employees, their knowledge, and competencies. Furthermore, it was noted that the dynamics of conducting training sessions are continuously slowed down by a shortage of staff in the Human Resources Management Authority, which cannot respond to all strategic demands due to overload. Attempts were made to resolve these challenges through the Action Plan 2025–2026, which provided for the development of the eAcademy, and the intensification of the application of the competency framework in recruitment. The work of the Commission for the Analysis of Service Contracts is highlighted as a significant success in resolving the problem of excessive hiring, through whose activities the number of these contracts was reduced by 14.58% during 2025.

Within Strategic Objective IV: Transparent and open public administration, a moderate achievement of indicator target values was reached, whereby less than half of the planned activities were implemented (12 out of 27), while as many as 12 activities did not start, confirming that reform measures in this segment were burdened by slow dynamics. Although the data for 2025 point to positive trends for a

portion of the performance indicators (the 2026 target value was achieved for 4 indicators and a positive trend was noted for another 4 indicators), the implementation of the new Action Plan for the period 2025–2026 still proceeds at a slow pace (3 out of 16 activities implemented). Key factors for delays and systemic challenges that slowed down the reform relate to the late adoption of the new Law on Free Access to Information (December 2025), which directly influenced the delay in forming the Council for Free Access to Information and postponed the full application of European standards in handling requests. Furthermore, the delay of reforms within this strategic objective was also influenced by hacker attacks on the Government's IT infrastructure during 2022 and 2023, which led to the temporary non-functionality of the Open Data Portal, causing a significant standstill in the publication and revision of datasets. In addition, the lack of responsiveness by public authorities in handling requests resulted in a growth in the share of approved appeals due to the failure to issue decisions within the deadline, which created pressure on the work of the AZLP. This pressure was compounded by the fact that the planned linkage of the appeals procedure with the information system of the AZLP to Information was not realized because technical prerequisites were not met, and the deadline was moved to 2026. These challenges in the field of free access to information of public importance were addressed through the adoption of the innovated Law on Free Access to Information at the end of 2025. In this way, a legal framework was created to narrow the scope for abuses and ensure more efficient exercise of the right to access information, alongside an increase in available datasets to 675, with the publication of the first 10 high-value datasets with API access, thereby strengthening proactive transparency. Moreover, the problem of inefficiency is being resolved through the intensification of training sessions for officials (over 300 participants in 2024) and the formation of a network of authorized persons for better coordination and faster response to citizens' requests. The quality of work of the AZLP has already been significantly upgraded, as illustrated by the data showing that the share of the AZLP's decisions overturned by the Administrative Court dropped to a record low of 0.098% in 2025.

Within Strategic Objective V: Policy planning with citizens and for citizens, moderate results were achieved for the period 2022–2024, with only slightly more than half of the planned activities implemented (18 out of 34). Although data for 2025 point to the fulfilment of objectives for 4 out of 10 performance indicators, negative trends and the lack of data for the remaining indicators confirm that the results-based planning system, which is crucial for public policy planning, has not yet fully come to life in all portfolios. The greatest success was achieved in raising the quality of strategic documents (83.33% aligned with methodological criteria), as well as in conducting evaluations of strategic documents (from a baseline value of 31% to 80% in 2025). This points to a strengthening of discipline in the application of regulations by authorities, as well as to the value of the continuous implementation of the Professional Education Programme and its modernisation with an evaluation module. On the other hand, the key failure factors and

reasons for delays are the fragmentation of portfolios (an increase in the number of ministries to 25), which created a risk to financial sustainability and hindered the work of the Strategic Planning Network due to constant shifts in competences, staff attrition and turnover, as well as hybrid attacks on the Government infrastructure that put the IT system ISPI out of function for a longer period. Along with the delay in finalising the methodology for linking plans with the programme budget, this prevented the setting of clear objectives and measurable indicators within ministries. These problems are being addressed through the revitalisation of the ISPI system and work on technical specifications for its connection with the programme budget software, which is provided for in the Action Plan 2025–2026. Furthermore, focus has been placed on the intensification of training sessions through programmes such as RIA trainers (57 trained officials in 2025) in order to compensate for the lack of capacity to draft high-quality regulations and strategic documents, and to ensure evidence-based policy planning.

Focus group participants expressed differing views regarding the adequacy of deadlines for completing activities. Bearing in mind the data showing that only 5% of activities were not started in 2025, this points to an increase in efficiency and the adequacy of deadlines. On the other hand, certain respondents stated that the goals related to the work programmes of ministries were set too ambitiously, which is why they plan to use the preparation process of the new Annual Government Work Programme as a key mechanism for improving administrative practice and introducing greater discipline in planning. It was also emphasized that in the upcoming period, the focus will be on transparently translating Government priorities into concrete work plans of ministries, especially in anticipation of the new medium-term cycle. On the other hand, officials from the local level stated that deadlines were ambitious in the period 2022–2024, but that a better adjustment was achieved with the Action Plan 2025–2026. The conclusion of the focus group participants is that the delay in deadlines itself is not considered a problem if the reform activities are ultimately implemented.

Based on all the above, it is observed that for all strategic objectives, except for Strategic Objective II, limited results and outcomes have been achieved so far, which correlates with the timeliness of activity implementation and the corresponding number of realized activities. Namely, over 70% of the activities under Strategic Objective II planned in the Action Plan 2022–2024 have been implemented, while this percentage does not exceed 55% for the other strategic objectives. It is also necessary to point out that achieved values are not available for a large share of indicators, which further complicates the situation. The most common reasons for delays in activity implementation relate to frequent government turnovers and the subsequent reorganisation of authorities, delays in adopting regulations, the hacker attack from 2022, a lack of responsiveness and inefficiency of authorities in handling procedures, as well as limited capacities in the IT sector and for conducting training sessions.

Were the financial resources efficiently utilized to support the implementation of the Strategy? Did they lead to an improvement in the Strategy's indicators?

Financial resources were, for the most part, well planned. This is concluded based on the analysis of the implementation rate of the Action Plan activities and the funds spent on activity implementation so far. Furthermore, focus group participants also believe that the estimates of required financial resources were good, and that there were sufficient financial resources to implement the planned activities alongside adequate donor support. Specifically, out of 183 activities in the Action Plan for the period 2022–2024, the required funds were planned for 175 (96%) activities, while for 8 (4%) activities it was estimated that the engagement of additional resources would not be necessary. Out of the total number of activities for which funds were planned, less than 50% of the planned funds were spent on 110 activities (63%), between 50% and 100% of the planned funds were spent on 27 (15%), while the planned budget was exceeded in 15 (9%) cases. For 23 activities (13%), the implementation of planned resources was not reported. Overall, for the period ending with 2024, a mere 4,408,595 € was spent, or about 36.8% of the initially planned 11,967,330 €, while at the end of that three-year period, the percentage of fully realized activities amounted to 55%. For the Action Plan 2025–2026, it is still too early to assess fund expenditure, but what could be determined so far is that 1,132,334 € was spent in the first year, representing 28.33% of the total two-year budget of 3,996,700 €, i.e., 46.2% of the budget planned for that year. These funds were spent on the realization of 32% of fully implemented activities and a high share of activities (63%) whose implementation was ongoing. It should also be borne in mind that for 14 realized activities (11% of the total number of planned activities) and 60 initiated activities (47% of the total number of planned activities), fund expenditure was not reported in the 2025 implementation report.

In the upcoming period, more significant financial resources will be required for capacity building (among other things, through the retention of existing civil servants, improvement of personnel capacities, delivery of training sessions, drafting of analyses, plans, activities, etc.), as well as funds for establishing and upgrading already built systems and IT infrastructure, and for ensuring the sustainability of the achieved outcomes (especially in the field of digitalisation). It is emphasized that IT experts are heavily overburdened and underpaid within the public administration system, making them difficult to retain. On the other hand, newly employed staff require a lot of time to become professionally trained and inducted into the job. Precisely for this reason, it is necessary to conduct a functional analysis of, among others, IT positions in public administration, as well as a workload analysis of civil servants in these and other professions. Respondents pointed to the Government's decision to enable salary increases for these professions, but the question remains whether ministries will consistently implement this decision in practice and adequately

reward employees. Additionally, respondents highlight the importance of critical IT infrastructure, noting that the cyberattack drastically aggravated the capacity situation in public administration. For these reasons, it is necessary to preserve IT human resource capacities, pay close attention to their professional development, workload, quality measurement, and adequate remuneration. It is noted that it is difficult to find interested IT experts willing to work in public administration because candidates from outside the system still do not perceive public administration as a good and desirable employer. Due to vacant positions for IT experts, it often happens that, during amendments to the systematisation of positions, these slots are even abolished because they have not been filled for a certain period, leading to a perception that they are not even needed.

Municipalities emphasize the need for the central level of government to provide financial assistance in order to implement planned activities, as internal financial resources from local budgets have so far been a limiting factor for activity execution.

The local level also points to a personnel deficit as a threat to the implementation of planned activities. Local-level focus group participants emphasized that, for adequate efficiency in implementing planned activities so far, they lacked human resource capacities in the fields of IT, international project management, monitoring, and evaluation. These deficiencies negatively affected the ability to withdraw funds from international projects, resulting in missed opportunities to upgrade the operations of the municipalities themselves. What is encouraging is that representatives of the authorities participating in the implementation of the Strategy and Action Plans are aware of the need and are active regarding the acquisition of donor funds for the implementation of planned activities in the future period.

Conclusion on Efficiency

The efficiency of the reform in the observed period was uneven, which is confirmed by the gap between the degree of achievement of the planned objectives and activities across strategic objectives, and the actual expenditure of resources so far.

Out of 183 activities that were planned in the Action Plan 2022–2024, only 55% (100 activities) were fully realized, while 27% (49 activities) were not started. Although financial resources were planned for as many as 96% of the activities, budget execution significantly lagged behind the plan: for 63% of the activities, less than half of the predicted funds were spent, while for 13% of the activities, fund expenditure was not reported at all. In 2025, a more stable dynamic is observed, with 32% of activities realized and 63% of activities ongoing, alongside only 5% of activities that has not started. Such limited efficiency in terms of time and money was primarily caused by hybrid cyberattacks that forced the administration into a prolonged system recovery instead of development, frequent government turnarounds and subsequent reorganisations, delays in the implementation of regulatory activities, and a chronic deficit of specialized staff. In response to the limited efficiency caused by technical crises and unrealistic

deadlines, an upgraded coordination structure and a new Coordination Team were established in 2025, which should contribute to a more complete realization of the current Action Plan by the end of 2026.

4.3 Impact

To what extent has the general objective of the Strategy been achieved? What actual changes for the better has the Strategy achieved for users (the administration, the economy, and citizens)?

The overall objective of the Public Administration Reform Strategy 2022–2026 is the joint building of an accountable, efficient, and transparent public administration that is fully oriented toward the needs of citizens and the economy. The vision of this reform process is to create a professional administration that delivers high-quality services and possesses adequate capacities for full EU membership by 2026. However, the desired impacts at the level of strategic objectives, namely the aforementioned overall objective of the Strategy, have not been defined. This hinders the assessment of whether, and to what extent, the strategic goals of the Strategy have been achieved. What also precludes this assessment is the fact that the external evaluation was conducted in the middle of the second year of the Action Plan 2025–2026 implementation, i.e., before the completion of the Strategy and the current Action Plan. Therefore, at the time the evaluation was carried out, the implementation period of the Strategy and the current Action Plan had not yet ended, which limits the possibility of providing a definitive assessment of its overall impact on society. Even in the case of completed activities, time is required for their full effect to be felt in practice regarding the work of the administration, the lives of citizens, and the functioning of business entities and the non-governmental sector. This was also confirmed by focus group participants, who noted that public administration reform is not sufficiently tangible and that it takes time for its effects to become visible, which is why public administration reform is occasionally not a political priority.

In the previous section of this report concerning efficiency, the results and outcomes achieved so far in the implementation of the Strategy and activities planned under the Action Plans were highlighted. This included progress in introducing the quality management system (which will have a positive long-term impact on governance in public administration and public service delivery), the evaluation of strategic documents (which will have a positive long-term impact on data- and evidence-based policy-making), and the adoption of critical laws (for instance, the Law on Amendments to the Law on State Officials and Employees, which will have a positive long-term impact on strengthening the principles of meritocracy, depoliticisation, and accountability in the work of public administration; and the Law on Free Access to Information, which will have a positive long-term impact on more efficient

communication between citizens and the public administration, etc.). However, these impacts are long-term in nature, and it will only be possible to review the actual impacts of the realized activities in practice after a certain period of time. Through the aforementioned, the public administration in Montenegro has thus obtained the foundations for more accountable work, but additional time is required for these processes to be fully integrated and for their real effects to be felt in the operation of the public administration itself, as well as on the lives of citizens and the functioning of the private and non-governmental sectors.

Real positive changes so far are definitely most visible through the digitalisation of public services, and their greater availability and quality. Namely, the number of electronic services on the eGovernment Portal has increased, the electronic signature and seal (GovME CA) have been introduced, alongside the possibility of electronic payment of administrative fees (NS-NAT), an extremely high degree of acceptance of the *eStudent* pilot service has been confirmed, and municipalities are increasingly ensuring networking and data exchange in order to provide quality public services to their citizens, etc. These innovations, along with the implementation of the eDMS system for "paperless" operations and the drafting of 10 Guides for Administrative Procedures, have simplified procedures and contributed to the citizen satisfaction index with public services, according to the Balkan Barometer, reaching its highest score in the period leading up to 2024.

Attention should be drawn to the perception of focus group participants that public awareness of public administration reform, its importance, and the results, outcomes, and impacts achieved so far has been relatively low. This was also confirmed by SIGMA in its 2024 monitoring report, which pointed out that, despite certain media coverage during the public administration reform planning phase, the visibility of implementation reports and the awareness of the general public and stakeholders regarding achievements were quite low. Focus group participants pointed out that public perception is highly important, especially in public service delivery. Namely, there have been shortcomings regarding the development of electronic services at the local level, as well as deficiencies related to the ease of use of electronic services (for example, in the case of the electronic ID card service, due to the complexity of using this service, intermediaries have even begun to appear, offering citizens support services in utilizing this electronic service). Inefficient and complex electronic services have a particularly negative impact on citizen satisfaction. It was also noted that certain electronic services are not well promoted, meaning that citizens are unaware of them (for example, the Ministry of Internal Affairs offers an electronic ordering service for certain documents, but people do not utilize this right/service). Finally, it must be borne in mind that people in rural areas lack internet access, which is why it is essential to provide high-quality traditional services as well, and not just electronic ones.

At this moment, a single methodology for the systematic measurement of user satisfaction with the provided services does not exist in Montenegro. However, on the eGovernment portal, methods for measuring satisfaction with digitalised services have already been developed, and the submission of user feedback has been enabled. One of the recognized methods of communication with citizens is the Government portal, which features 96 sub-portals, where a "chatbot" has also been launched.

Conclusion on Impact

Although the Public Administration Reform Strategy has led to certain shifts, results, and outcomes, the final impact of the reform cannot yet be fully assessed because the implementation of the Strategy and the current Action Plan 2025–2026 is still ongoing. The most visible changes for citizens and the economy have been achieved in terms of providing electronic services.

4.4. Sustainability

To what extent are future interventions within the public administration reform sustainable in terms of funding, and to what extent are the capacities of stakeholders for the Action Plans to implement the PAR Strategy sustainable?

Based on the analysis of information and data from the Action Plan implementation reports, and discussions within the focus groups, the finding is that the interventions within the public administration reform planned by the Strategy and Action Plans are financially sustainable thanks to stable support from the national budget, EU funds (IPA III), and resources from other donors; however, their operational sustainability is under pressure due to limited administrative capacities, the consequences of frequent reorganisations of the Government and authorities, and a shortage of professional staff who could efficiently transform the planned funds into achieved results.

An important pillar of financial sustainability is represented by EU support through the Sector Budget Support (SBS) instrument within the IPA III programme, whose total value amounts to 16.6 million €, out of which 13.1 million € is provided as direct budget support and 3.5 million € as complementary support for the implementation of the Public Administration Reform Strategy and the Public Financial Management Reform Programme. The complementary support encompasses two technical assistance projects for public administration reform (1.3 million €) and public financial management reform (1.5 million €), as well as a joint project "Support for Coordination, Monitoring, and Reporting on PAR and PFM 2022–2026" (700,000 €). Insights into the donor matrix, which displays all projects, help identify 7 support projects oriented toward the Strategy with a total funding amount of 6,576,000 €, whereby funding for one project is not stated.

For the implementation of the Strategy, a total of 23,750,000 € is envisioned over the five-year period 2022–2026. Under the Action Plan 2022–2024, an expenditure of 11,967,330 € was planned until the end of 2024. For the realization of activities provided for by the Action Plan 2025–2026, a total of 3,996,700 € is planned, while 2,449,500 € is envisioned for the activities planned in the year 2025.

When it comes to the spent resources, according to data from the annual implementation reports:

- For the period ending with 2024, out of a total of 183 activities provided for by the Action Plan 2022–2024, financial resources were planned for 175 (96%) activities, while for 8 (4%) activities it was estimated that they would not require additional funds. The expenditure analysis of the planned funds shows that less than 50% of the planned resources were spent on 110 activities (63%), for 27 activities (15%) the expenditure was between 50% and 100%, and in 15 cases (9%) the planned budget was exceeded. For 23 activities (13%), the institutions did not submit data on the realization of funds. For the activities implemented in the period 2022–2024, a total of 4,408,595 € was spent, which is significantly less than the initially planned 11,967,330 € for that period. Although the annual implementation reports emphasize that financial and fiscal sustainability is conditioned by the planning of resources within the budgets of all lead institutions, the data on the low level of fund expenditure (63% of activities with expenditure below 50%) point to implementation challenges, rather than a lack of money;
- For the period ending with 2026, out of a total of 129 activities provided for by the Action Plan 2025–2026, financial resources are planned for the implementation of 108 activities (84%). In the annual implementation report for 2025, the spent resources were displayed for 27 activities (out of which 15 were realized and 12 were ongoing in implementation). It was stated that for the activities implemented during 2025, resources were spent in the total amount of 1,132,334 €. For 1 activity, it was stated that no resources were spent.

The main risks to the sustainability of the achieved results so far and the entire public administration reform, which were identified during the evaluation process, encompass the following:

- Institutional instability: Frequent government reorganisations (an increase in the number of portfolios from 12 to 25, unplanned inspection reform, etc.) and the redistribution of competences led to discontinuity in work and a loss of institutional memory;
- Attrition of trained staff: Reports note a high turnover of civil servants, particularly in units for strategic planning and IPA programming, directly threatening the ability of institutions to qualitatively plan and spend funds;

- Lack of required staff: A shortage of necessary personnel across various professions has been observed, including IT experts, while simultaneously the recruitment process does not function efficiently;
- Deficit of specialized skills: The Human Resources Management Authority continuously points to a shortage of personnel for conducting training sessions and managing human resources, which slows down the professionalisation of the administration;
- Significant dependence on donor funds and external support: It was observed that the availability of donor funds often dictates the very beginning of the implementation of planned activities, instead of the administration relying more on budget funds and its own human resource capacities;
- Ambitious planning of activities and deadlines, which should be better aligned with realistic administrative capacities and the need for long-term stabilization of human resources;
- Inadequate planning of financial resources for the further development and maintenance of digital platforms provided for by the Strategy and Action Plans, in order to achieve their sustainability;
- Insufficiently precise and timely reporting: A significant number of institutions still fail to submit precise data on the level of achievement of performance indicator target values and fund expenditure, which hinders the monitoring of the reform's effectiveness, efficiency, and sustainability, as well as the planning of future interventions.

Regarding the existence of capacities for sustainability, focus group participants stated that it is necessary to improve human resources within authorities through the engagement of new motivated civil servants, and that it is necessary to provide sufficient time for the training of these officials. The need to retain existing staff is emphasized due to the difficult recruitment of new personnel (both due to procedures and due to the weak interest of candidates from outside the public administration system), as well as the time required to train the staff. Due to the risk of staff attrition, respondents propose conducting an analysis of key functions for the drafting, coordination, and implementation of public administration reform, alongside an analysis of the required scarce professions for these functions.

What would be the most likely consequences of suspending or withdrawing the current operations of the Strategy?

Suspending or withdrawing the current operations of the Strategy and the Action Plan 2025–2026 would have far-reaching negative consequences for the budget, the quality of services for citizens and business entities, the non-governmental sector,

Montenegro's EU accession process, and generally the readiness of the administration for all the new obligations awaiting Montenegro on the day of its entry into the EU. Failure to meet the reform objectives carries a direct risk of:

- Suspension of the Sector Budget Support disbursements within the IPA III funds: The 2024 report states that a successful reform is a condition for the realization of a total of 16.6 million € in EU support. A disruption of reform activities would mean the loss of the remaining tranches of direct budget support worth 13.1 million €, and the suspension of complementary technical assistance projects with a total value of 3.5 million € (primarily the EU4PA (1.3 million €) and EU4PFM (1.5 million €) projects, which are vital for strengthening the administration and meeting the benchmarks for closing negotiating chapters);
- Non-withdrawal of funds provided under the Reform Agenda due to the non-fulfilment of reform activities and failure to reach performance indicator target values related to the Strategy: a) 2.4.3 Delivery of user-friendly digital public services, which is directly linked to the Strategy's activities concerning digitalisation (Strategic Objective II), with envisioned EU financial support exceeding 8.1 million €, and b) 1.1.3 Removing regulatory barriers and facilitating business operations, which is directly linked to the Strategy's activities concerning policy planning with citizens and for citizens (Strategic Objective V), with planned support of nearly 3.5 million €;
- Non-withdrawal of funds from the "Montenegro Digital" project and platforms such as IBM-BPM and X-Road platforms: This would halt the current momentum of service digitalisation that is currently underway. Without financial support for the maintenance of these systems, citizens would return to traditionally bureaucratic and more complicated procedures, resulting in an unnecessary waste of time and money. The interoperability of registries would be particularly threatened, freezing at the current 18 linked pairs instead of the targeted 50, thereby making electronic services of a high level of sophistication permanently unavailable;
- Suspending support for the CAF model and other quality standards (ISO, BFC SEE) would mean a loss of institutional memory and the cessation of the practice of objectively measuring administrative performance. The current success where 16 institutions have introduced these systems under the leadership of the Ministry of Public Administration would be rendered meaningless as mentoring and advisory support to other authorities would be absent. Furthermore, without funds to implement the findings of functional analyses regarding the number and competencies of employees, the public administration would remain suboptimal, with a disproportionate division of labour and overloading;
- Non-withdrawal of funds for the monitoring and evaluation of strategic documents, whose drafting practice rose to 80% in 2025, would lead to public

policies being created without evidence and measurable data. Suspending activities on the Open Data Portal and systems like eParticipation and ePetitions would further reduce transparency and citizen trust in institutions, while the non-adoption or non-application of planned legal solutions in the field of free access to information and the civil service system would return the administration to a state of politicisation and low accountability.

Conclusion on Sustainability

The planned activities are, for the most part, financially sustainable thanks to a combination of the national budget and significant EU support through IPA III funds and other donors. However, operational sustainability is seriously threatened by the low capacities of the institutions responsible for implementing the planned activities, as well as by institutional instability, the attrition of trained staff, a shortage of personnel possessing specialized skills, and an inefficient recruitment process for missing staff, among other factors. Suspending or withdrawing the Strategy would lead to the loss of millions in EU funds, the halting of public service digitalisation, the loss of quality standards in the management process, and a return to an untransparent and inefficient administration, which would directly slow down Montenegro's EU accession process and reduce the trust of citizens and the economy in state institutions.

5. Evaluation Findings and Conclusions

5.1. General methodological findings and conclusions

- The Strategy and accompanying Action Plans do not contain impact indicators at the level of strategic objectives. This prevents monitoring the level of achievement of impact indicators, i.e., the level of achievement of strategic objectives, as well as identifying and reviewing long-term impact;
- The Strategy and Action Plans contain performance indicators at the level of operational objectives; however, they are sometimes formulated as output indicators (which relate to the activity level);
- The number of performance indicators at the level of operational objectives is excessive, which prevents efficient and quality reporting, and consequently, implementation monitoring;
- A number of performance indicators at the level of operational objectives are inadequate, because the achieved target values are not measured or cannot be measured, while a number of indicators are not reported on, are not reported on at regular and planned intervals, or are reported on partially (for example, within the value of the indicator "The amount of funds forcefully collected in cases represented by the Protector of Property and Legal Interests" it is impossible to isolate funds collected in labour disputes, as the funds are displayed as a total). The unavailability of performance indicator values prevents a proper assessment of the effectiveness and impact of the Strategy, and the increase in the number of indicators for which reporting is absent points to a decline in public administration capacity, as well as an increased burden due to which the Strategy loses its priority status;
- There are performance indicators at the level of operational objectives that simultaneously relate to both central and local authorities; for example, the "% of institutions measuring the satisfaction of state and local civil servants" displays two values—essentially containing two performance indicators, which hinders a clear presentation of operational objective achievement;
- The performance indicator passports are not precise and clear in every individual case to the officials who are supposed to follow them during reporting;
- The Strategy and Action Plans contain output indicators at the activity level, which are mostly process-oriented and qualitative;
- A direct link between the formulated planned activities and operational objectives does not exist in every individual case, which blurs the picture regarding the

contribution of results achieved through activity implementation to the outcomes at the operational objective level;

- A number of activities were identified that do not correspond to the problems identified during the development of the Strategy, and for the purpose of resolving which those activities were proposed;
- Unsystematic reporting on the expenditure of financial resources was observed, which also includes the fact that the amount of funds spent has not been reported for a number of implemented activities. This reduces the possibility of monitoring and assessing the management of funds during the implementation of the Action Plan, i.e., the assessment of the efficiency of the Strategy and Action Plans.

5.2. Individual comments on indicators and activities within the strategic objectives

Strategic Objective I: Organisation and operation of public administration in the function of citizens' needs

- In the Indicator Passport for the indicator "The amount of funds forcefully collected in labour cases represented by the Protector of Property and Legal Interests", for Operational Objective 1.1 (Functional public administration with efficient oversight over its work and application of the concept of managerial accountability), it is not defined what labour cases are, and it is necessary to supplement the indicator passport with this information to clarify what the indicator monitors and what information on the degree of objective achievement it can produce;
- The indicator "Percentage of institutions in which a reporting system has been established at the level of performance indicators and objectives that would enable monitoring of results achievement with programme budget implementation indicators", for Operational Objective 1.1 (Functional public administration with efficient oversight over its work and application of the concept of managerial accountability), is not being monitored and has been replaced by the indicator "Percentage of ministries in whose annual work reports the result is presented based on the set objectives and indicators". The replacement indicator is not adequate as it does not imply a link with programme budget implementation indicators. Furthermore, this indicator is not described in the Indicator Passport, and it is necessary to supplement the indicator passport in this section;
- The indicator "Number of administration bodies over which administrative oversight was conducted by the line ministry", for Operational Objective 1.1 (Functional public administration with efficient oversight over its work and application of the concept of managerial accountability), is defined to refer to an absolute value (number), but its target values are presented in percentages. The

reports state that it is not possible to monitor the indicator because the methodology has not been drafted and administrative oversights were not conducted. Within the action plans, it was necessary to provide for the activities specified in the Indicator Passport regarding the "possibility of conducting administrative oversights (drafting methodologies for conducting oversight over the legality and expediency of the work of administration bodies; conducting oversight over the legality and expediency of the work of local self-government bodies in the application of systemic laws, following amendments to the Law on Local Self-Government which will more closely define this competence, and conducting oversight over the legality and expediency of the work of local self-government bodies regarding delegated and entrusted tasks)" in order to ensure reporting against this indicator, i.e., to enable monitoring of the implementation rate of these methodologies and the accountability of authorities during their drafting;

- The indicator "Percentage of laws harmonized with the Law on Public Administration", for Operational Objective 1.1 (Functional public administration with efficient oversight over its work and application of the concept of managerial accountability), directly corresponds to activity 1.1.12 (Harmonization of special laws with the Law on Public Administration) and represents an output-level indicator, rather than an outcome-level (performance) indicator;
- Activity 1.1.1 (Drafting the Proposal for the Law on the Government), activity 1.1.2 (Adoption of the Law on Public Institutions, for whose implementation the indicator "Determined proposal for the Law on Public Institutions" is designated), activity 1.3.1 (Drafting the Proposal for the Law on Local Self-Government), activity 1.3.3 (Drafting the Proposal for the Law on Local Officials and Employees), as well as activity 1.3.7 (Preparation of the Proposal for the Law on Regional Development), possess a flaw because drafting a proposal has no impact on goal achievement, meaning it in no way affects the rights and obligations of state authorities and other stakeholders. Although drafting a bill is a prerequisite for its adoption, these regulatory activities need to be modified to envision the adoption of the given laws so that the output, outcome, and impact of the laws can be measured;
- For monitoring the implementation of activity 1.1.10 (Strengthening the human resource capacities of the Administrative Inspection), the indicator "Increased number of employees in the Administrative Inspection" is designated, whereby the target value of the indicator has not been determined;
- For monitoring activity 1.1.13 (Promoting the mechanism for the peaceful resolution of labour disputes), the indicator "Promotion of the arbitration procedure in labour disputes" is designated, whereby it is necessary to state in what manner the promotion of the arbitration procedure will be carried out so it

can be evaluated whether the promotion was conducted properly and whether it was accessible to the target groups;

- The indicator "Reduced outstanding liabilities of local self-governments in absolute amount", for activity 1.3.10 (Establishing enhanced supervision over the financial operations of local self-governments through issuing opinions on the budget and periodic reports on the financial position of local self-governments which will contain concrete recommendations), is a performance indicator because it points not only to the fact that the activity has been implemented, but also to the final outcome of the given activity. Accordingly, it should be set as an indicator at the level of the operational objective. Furthermore, target values have not been determined for the indicators "Number of issued opinions" and "Number of inspections by the Budgetary Inspection".

Strategic Objective II: Citizens and businesses use high-quality public administration services

- The source of verification for the indicator "Percentage of administrative acts overturned by the Administrative Court", for Operational Objective 2.1 (More efficient service delivery and introduction of quality management of provided services), is the Report on the Implementation of the Law on Administrative Procedure, which is drafted every two years, preventing monitoring on an annual basis;
- The indicators "Percentage of electronically submitted applications relative to the total number of applications submitted by users for the use of the pilot service" and "Number of pairs of electronically linked registries in the metaregistry", for Operational Objective 2.2 (Full interoperability of information systems and an increase in the number of electronic services at a high level of sophistication), do not provide complete information on the interoperability of information systems, i.e., information on the use of data exchange during the execution of electronic services. It is necessary to add an indicator that would monitor the number or percentage of electronic services where data from different registries are exchanged;
- For activity 2.2.2 (Establishing electronic data exchange between registries), the designated indicators are "Number of electronic registries in the Metaregistry" and "Number of electronic exchanges between registries", for which a target value has not been determined;
- For activity 2.2.3 (Creating conditions for establishing e-delivery), the designated indicator is "Drafting a Roadmap for amending the regulatory framework, technical, and IT conditions". The specified indicator does not report on the creation of conditions for establishing e-delivery, but only that a roadmap for creating the conditions will be drafted, and not that the activities within the roadmap will be implemented.

Strategic Objective III: Professional public administration

- The indicators "Percentage of authorities that have drafted a Personnel Plan of improved quality through the CPR; Percentage of local administration bodies and services at the local level that have drafted a Personnel Plan through the CPR in accordance with the LSE and in accordance with the LLS" and "Percentage of adopted Personnel Plans of state authorities and local administration bodies" for Operational Objective 3.1 (Efficient personnel planning system based on identified needs, depoliticisation and improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system), as well as the indicator "Percentage of institutions measuring the satisfaction of state and local civil servants" for Operational Objective 3.2 (Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development), need to be, for the sake of clarity, separated into indicators that monitor central authorities and indicators that monitor local authorities in order to more precisely assess the degree of objective achievement;
- The indicators "Average number of candidates per job advertisement" and "Average number of candidates per job vacancy competition" for Operational Objective 3.1 (Efficient personnel planning system based on identified needs, depoliticisation and improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system), need to be, for the sake of clarity, separated so that distinct indicators monitor internal and distinct indicators monitor external vacancy competitions. It is important to note that the number of applicants per advertisement can vary depending on the number of advertisements published during the year, the attractiveness of the specific positions offered, and the situation on the labour market; therefore, alternatively, these indicators should be monitored so that averages are displayed over a higher number of years;
- Although the indicator "Percentage of local self-governments with a developed Human Resources Information System" for Operational Objective 3.1 (Efficient personnel planning system based on identified needs, depoliticisation and improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system), and the indicator "Percentage of civil servants who were promoted or rewarded based on their performance evaluation" for Operational Objective 3.2 (Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development), are relative indicators, the values reported are given in absolute terms, which prevents a true insight into the degree of objective achievement;

- For the indicator "Percentage of state authorities, state administration bodies and local self-government units that strategically plan training" for Operational Objective 3.2 (Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development), the source of verification is a biennial analysis, which prevents monitoring of this indicator on an annual basis;
- For activity 3.1.1 (Amendments to the Law on State Officials and Employees), the indicator "Determined proposal for the law with a focus on strengthening professionalisation and meritocracy in the state administration, strengthening the institute of acting officials, regulating the status of the Disciplinary and the Appeals Commission, strengthening the status of inspectors, strengthening the internal labour market and mobility" is designated. The determined proposal has no impact on the achievement of the objective, meaning it does not in any way affect the rights and obligations of state authorities; therefore, it is necessary to modify this activity to provide for the adoption of the law so that the output, outcome, and impact of this activity can be monitored;
- For activity 3.3.7 (Establish effective mechanisms for the control of active sick leaves through targeted inspections), the indicator "Reduced number of sick leaves" is designated, but a target value for this indicator has not been determined;
- For activity 3.3.9 (Strengthening administrative capacities in public administration at the central and local level in the field of EU funds management), the indicator "Adopted Recruitment Plan for new civil servants for EU funds management, with a focus on two pilot sectors (environmental protection, employment and social policy)" is designated. This indicator does not show whether an actual strengthening of capacity occurred and in what manner, but only that a plan exists to strengthen capacity; therefore, it is necessary to either reformulate this indicator or add an indicator that will directly measure capacity building and be able to report on it.

Strategic Objective IV: Transparent and open public administration

- The indicator "Share of public authorities registering requests for access to information in the information system (relative to the total number of public authorities)", for Operational Objective 4.1 (Improving the functioning of the legal protection system in the field of FAI and strengthening the capacity of the AZLP), is an activity-level indicator because it does not show the policy's outcome on improving free access to information, but merely the formal action of authorities in recording requests for access to information. Furthermore, although it is a relative indicator, it is reported in absolute amounts;
- For the indicator "Share of public authorities proactively publishing information in accordance with the Law on FAI", for Operational Objective 4.3 (Improving the

reuse of information and increasing the availability of open data), reporting has not been established because the reports cover conducted inspection oversights which do not show whether authorities publish information in accordance with the Law on Free Access to Information; therefore, it is necessary to establish reporting against this indicator;

- The indicator "Number of institutions publishing data on the open data portal", for Operational Objective 4.3 (Improving the reuse of information and increasing the availability of open data), is reported in percentages although it is an absolute indicator; therefore, it is necessary to establish reporting in accordance with the type of indicator;
- For activity 4.1.1 (Improving the appeals and other procedures as well as the formal organizational structure and practices in the AZLP), the designated indicators are "Analysis of the appeals procedure and other procedures conducted by the Agency – developed" and "Analysis of the internal organizational structure of the Agency and processes (the relationship between the Council and the expert service) with recommendations for improvement – conducted". These indicators are limited to the level of conducted analyses, but do not enable reporting on the actual improvement of the procedure;
- For activity 4.3.8 (All institutions publish open data and metadata) and activity 4.3.9 (Promoting the preparation of data in a machine-readable format), the designated indicators lack target values; therefore, it is necessary to determine them.

Strategic Objective V: Policy planning with citizens and for citizens

- For the activities: 5.1.3 Conduct training sessions for drafting medium-term work programmes of ministries for the cycle 2026–2028, 5.1.5 Draft an overview of available gender-disaggregated data from the records of state authorities, 5.1.7 Improve capacities for costing strategic documents and fiscal impact assessment, 5.2.1 Define the policy coordination function at the ministry level with guidelines for its regulation in the acts on systematisation and organisation of ministries, 5.2.2 Establish the policy coordination function at the ministry level, 5.2.5 Realise an information session for policy coordinators on the strategic planning system in Montenegro, 5.3.6 Establishing cooperation with the Parliament regarding capacity building for RIA preparation during the adoption of laws and amendments, as well as activity 5.3.7 Establishing the Consultative Body for RIA (representatives of the Ministry of Finance, the General Secretariat of the Government, the Ministry of Public Administration, the Secretariat for Legislation, the Parliament, and municipalities), the designated indicators lack target values, and it is necessary to determine them.

6. Recommendations

6.1. Recommendations for the period until the expiration of the current Strategy and the ongoing Action Plan

Based on the findings and conclusions of the external evaluation, the following recommendations are proposed for the remaining reporting period:

- Strengthen coordination and monitoring of the implementation of the Strategy and Action Plan 2025–2026 in order to ensure better coordination, implementation, and reporting on achievements at the end of the Strategy's validity period;
- Provide adequate political, institutional, and financial support for the implementation of the Action Plan 2025–2026, in order to achieve the planned results and outcomes by the expiration of the Strategy and the ongoing Action Plan;
- Accelerate the implementation of activities and improve capacities for the completion of planned activities by the expiration of the Strategy and the ongoing Action Plan;
- Pay greater attention to communication, visibility, and public information regarding the achievements of the public administration reform by the end of the Strategy's and the ongoing Action Plan's validity period, in order to strengthen public trust and ensure the sustainability of the reform in the coming years;
- Effectively coordinate donors and external support by the end of the Strategy's validity period, in order to ensure sufficient funds and capacities for the implementation of activities for which donor funds are planned in the Action Plan 2025–2026.

6.2. Recommendations regarding possible options on the strategic approach to the continuation of public administration reform after the expiration of the current Strategy

Bearing in mind that the validity period of the Strategy and the ongoing Action Plan expires at the end of 2026, the Action Plan implementation rate of 32% at the end of 2025 (which left more than two-thirds of the activities to be implemented in 2026), the importance of public administration reform in the European integration process, as well as the upcoming elections and the constitution of a new Government in 2027, the need has emerged to analyze options that will ensure the continuity and effectiveness of reform processes in the upcoming period. In order to determine the further direction of public administration reform, a multi-criteria analysis was conducted, which, through the evaluation of the considered options based on defined criteria, points to potential choices. The following options were considered:

- Option 1: Status quo option – This option implies that upon the expiration of the Public Administration Reform Strategy 2022–2026, no activities regarding strategic planning in the field of public administration will be undertaken. Institutions would continue implementing unfinished activities and monitoring existing indicators at the level of operational objectives and activities from the current Strategy and Action Plan, until further notice;
- Option 2: Drafting a new Strategy and the accompanying Action Plan – This option envisions starting the drafting process for a new Strategy during the third quarter (Q3) of 2026, so that the document can be adopted in the first quarter of 2027. Compared to the existing framework, this approach would include setting impact indicators (at the level of strategic objectives) and redefining performance indicators (at the level of operational objectives) to mirror the desired changes more precisely, with the potential application of the CREAM method (Clear, Relevant, Economic, Adequate, Monitorable). This would be accompanied by the development of an upgraded "indicator passport", which would serve as a detailed monitoring tool and ensure a uniform understanding of the metrics. In the case of this option, activities should be defined and formulated to target the root causes of the identified problems to be resolved most effectively. Furthermore, the formulation of activities and output indicators would be approached in a way that ensuring the implemented activities are those capable of achieving the desired impact on stakeholders, i.e., unambiguously contributing to the achievement of operational objectives, and thereby to the achievement of strategic objectives;
- Option 3: Extension of the validity of the current Strategy and Action Plan alongside the preparation of a dynamic plan for drafting a new Strategy and the accompanying Action Plan – This option implies a formal extension of the validity period of the current Strategy and Action Plan until the end of 2027, but without significant modifications to the Strategy and Action Plan themselves, except for extending the deadlines for implementing activities that will not be completed by the end of 2026. In parallel, a dynamic plan for drafting the new Strategy and Action Plan would be prepared, providing a clear baseline for the efficient execution of all preparatory activities, with the aim of adopting a new, methodologically and substantively upgraded Strategy after the constitution of the new Government, which is expected during 2027, thereby ensuring the continuity of the reform;
- Option 4: Extension of the validity of the Strategy and Action Plan alongside upgrading the quality of these strategic documents and preparing a dynamic plan for drafting a new Strategy and the accompanying Action Plan – This option envisions extending the validity period of the Strategy and Action Plan until the end of 2027, but also redefining indicators at the level of operational objectives with the potential assistance of the CREAM method, as well as redefining activities and output indicators so that the implemented activities and their results contribute

even more to the achievement of operational, and thereby strategic objectives. In parallel, a dynamic plan for drafting the new Strategy and Action Plan would be prepared, providing a clear baseline for the efficient execution of all preparatory activities, with the aim of adopting a new, methodologically and substantively upgraded Strategy after the constitution of the new Government, which is expected during 2027, thereby ensuring the continuity of the reform.

Below is a table with the criteria used to compare the considered possible options with the help of Multi-Criteria Analysis. Annex 5 presents the calculation within the Multi-Criteria Analysis, while the calculation results are described further in this section below the table.

Table 3. Criteria for comparing possible options using Multi-Criteria Analysis

Criteria	Explanation of the Criterion	Explanation of the Weight
Effectiveness	This criterion measures the contribution of a specific option to achieving the public administration reform goals and providing the prerequisites for its monitoring and evaluation.	0.2 – the weight value reflects the importance that the chosen option must substantively achieve the reform goals.
Efficiency	This criterion measures the level of rationality of each option through the ratio between the spent resources (primarily civil servants' working hours and financial resources) and the quality and usability of the achieved output.	0.1 – The weight ensures that human resource capacities and financial resources are used rationally, while the primary focus remains on achieving the reform goals.
Compliance with EU Standards and SIGMA Principles	This criterion assesses the extent to which an option follows the requirements of the EC and the findings of SIGMA monitoring. Public administration reform is one of the three pillars of enlargement, and the optimal option must ensure the continued implementation of reform activities in Montenegro, avoiding delays in implementation, monitoring, and reporting.	0.15 – The weight value reflects the priority importance of the Euro-integration process and the necessity of aligning with the required standards and principles.
Sustainability	This criterion assesses the ability of the chosen option to ensure long-term stability and the smooth execution and monitoring of reform processes, preventing administrative bottlenecks, loss of continuity, and a decline in the achieved impacts of the reform.	0.15 – The weight value reflects the systemic importance of preserving stability and preventing institutional bottlenecks in the reform process, ensuring that transition periods do not compromise the continuity of public policies, as well as the sustainability of the achieved results, outcomes, and impacts.

Continuity and Consistency regarding National Strategic Planning Requirements	This criterion assesses the extent to which an option ensures the smooth continuation of reforms while ensuring compliance with regulations and the methodological framework for strategic planning.	0.2 – A high weight is assigned to indicate the importance of reform continuity and the application of the official legal and methodological national framework for strategic planning.
Transparency and Inclusiveness	This criterion assesses the level to which the prerequisites (available time, analytical baseline, etc.) are secured for the substantive inclusion of the public in the early phase of planning, implementation, and implementation monitoring of the public administration reform.	0.1 – The weight value reflects the need to provide all stakeholders with sufficient time for participation, and enough information based on which they could express their views on the proposed option.
Feasibility (Technical and Political)	This criterion assesses the realistic chance that the considered option will be implemented within the given timeframe, considering the political and social context regarding Montenegro's EU accession process, and the elections.	0.1 – The lower weight value is assigned with the intention that short-term technical and political challenges do not position themselves as a limiting factor for the consistent implementation of a properly structured and measurable public administration reform.

Based on the effectiveness criterion, the scores reflect the ability of each option to achieve the reform goals and ensure adequate indicators, taking into account the current level of Strategy implementation and the risk of shifting priorities brought by the election cycle and the formation of a new Government. Option 4 receives the highest score because, through the redefinition of performance indicators using the CREAM method and improvements in activity formulations, it corrects methodological deficiencies, enables greater short-term outcome, and provides a better possibility for performance monitoring, while the preparation of a dynamic plan establishes the prerequisites for drafting an effective multi-year Strategy. Option 2, although methodologically intended to be the most advanced, carries the risk that failure to meet deadlines for preparing new strategic documents during the election period, potential changes in the competences of relevant institutions, and staff turnover following the formation of the Government could diminish the quality of the document. Option 3 is valued lower because, despite preserving stability and preparation, it does not offer solutions to the methodological problems of the Strategy and Action Plan themselves. Option 1 is evaluated with the lowest score because, although it does not imply a complete cessation of ongoing activities, it does not provide for the methodological improvement of the Strategy and Action Plan, nor the adoption of new strategic documents, while the absence of a dynamic plan for their drafting creates a risk of planning discontinuity, as it leaves the administration without the necessary preparation for the timely development of a new Strategy and accompanying Action Plan after the formation of the new Government.

Based on the efficiency criterion, the scores reflect the ratio between the invested effort of the administration and the possibility of achieving the planned results. Option 3 is recognized as the most efficient because, with minimal current effort, it ensures resource savings in the future, providing reform continuity, a higher level of implementation of the existing Strategy, and the prerequisites for drafting a high-quality new Strategy and the first accompanying Action Plan. Option 4 is ranked immediately below the previously explained Option 3, as it requires more serious work on the methodological improvement of existing documents, but facilitates the subsequent process of drafting the Strategy. On the other hand, Option 1 brings only an apparent current saving, while in the future it jeopardizes the efficiency of work on drafting the new Strategy and accompanying Action Plan. Option 2 achieves the lowest score due to the maximum expenditure of resources on drafting new strategic documents.

Based on the criterion of compliance with EU standards and SIGMA principles, preference is given to options that ensure the implementation of reforms required by EU integration, while simultaneously addressing SIGMA recommendations. Option 2 receives the highest score because the drafting of a new Strategy and Action Plan enables the comprehensive application of EU standards and SIGMA principles. On the other hand, Option 4 partially respects EU standards and SIGMA principles through the methodological quality upgrade of the Strategy and the ongoing Action Plan, but this improvement is not complete and relates only to the transition period within which the existing strategic documents would remain valid. Option 3 would not ensure the application of SIGMA requirements at this moment but would provide the prerequisites for it through extending the validity period of the existing strategic documents in the period following their expiration, while Option 1 is the least acceptable because the absence of preparatory activities directly jeopardizes and slows down the drafting of the new Strategy and accompanying Action Plan, which will negatively affect European integration.

Based on the sustainability criterion, the scores reflect the ability of the options to ensure the stability of reform processes and prevent administrative bottlenecks. Option 4 receives the highest score because, through the redefinition of performance indicators and activities, it raises the sustainability of reform monitoring, while the creation of a dynamic plan sets a stable and sustainable baseline for future work on the new Strategy. Option 2 offers a potentially high level of sustainability through establishing a new reform framework, but this potential depends on the availability of capacity for drafting the Strategy in the pre-election period and the risk that the Strategy might not be aligned with the priorities of the new Government. Option 3, through the dynamic plan, creates the prerequisites for work on the new Strategy whose implementation will be sustainable, but it retains old indicators and activities without improving the sustainability of the reform in the transition period. Option 1 is evaluated the lowest because the absence of planning

activities directly interrupts the continuity of public policies and creates a risk of complete institutional standstill.

Based on the continuity and consistency criterion, the scores measure the securing of a smooth continuation of the reform, as well as the degree of alignment of the options with the official national legal and methodological framework for strategic planning. Option 2 receives the highest score because launching a new strategic cycle enables reform continuity and the full and consistent application of national methodological standards. Option 4, through the formal extension of the deadline for implementing the current Strategy and the dynamic plan for drafting a new Strategy and Action Plan, ensures the continuity of implementing reform activities, but partially respects national standards due to the revision of indicators, the redefinition of activities, and the extension of the current validity period. Option 3 provides only a formal deadline extension for implementing the current strategic documents alongside securing a dynamic plan for drafting a new one, but without an immediate upgrade of the current Strategy and accompanying Action Plan. Option 1 has the lowest score because the absence of any activities regarding planning the development of a new Strategy and Action Plan ensures neither the continuity nor the consistency of public administration reform.

Based on the transparency and inclusiveness criterion, the scores reflect the ability of the options to ensure sufficient time and information for the substantive inclusion of the public and all stakeholders in the reform processes. Option 2 receives the highest score because drafting a new Strategy and Action Plan, alongside consistent compliance with the national methodology, ensures the highest level of transparency and inclusiveness. Option 4 receives the second highest score because the redefinition of indicators and activities increases transparency through the obligation to involve competent institutions and other stakeholders in their redefinition, while it also guarantees an open and timely window for public participation in creating the future Strategy and Action Plan through the dynamic plan. Option 3 likewise provides an adequate timeframe for future consultations through the dynamic plan, but without an immediate improvement in the transparency of the process. Ultimately, Option 1 receives the lowest score because passive waiting without preparing a plan for drafting the Strategy significantly narrows the opportunity for dialogue with stakeholders and negatively affects the transparency of the reform.

Based on the technical and political feasibility criterion, the scores measure the realistic possibility of implementing the options in the specific context of pre-election circumstances and the formation of a new Government. Option 3 has the highest score because the formal extension of deadlines and the drafting of the accompanying roadmap do not require complex procedures or political consensus during the election period. Option 1 is highly feasible in the short term as it implies an absence of new activities, but it leaves a risk of technical overload and unreadiness of the administration to draft a new Strategy and Action Plan after the formation of the new Government. On the other hand, Option 4 carries challenges regarding technical feasibility as it requires

engaging administrative capacities for the methodological improvement of the Strategy during the pre-election period, while Option 2 is rated the lowest because the timely development of a new high-quality Strategy and Action Plan and their adoption in a pre-election environment is the least achievable.

The final ranking of the options places Option 4 (Extension of the validity of the Strategy and Action Plan alongside upgrading the quality of these strategic documents and preparing a dynamic plan for drafting a new Strategy and the accompanying Action Plan) in first place with 3.25 points, closely followed by Option 2 (Drafting a new Strategy and Action Plan) with 3.05 points. On the other hand, Option 3 (Extension of the validity of the current Strategy and Action Plan without their modification, alongside the preparation of a dynamic plan for drafting a new Strategy and the accompanying Action Plan) with 2.3 points, and Option 1 (Status quo) with a mere 1.4 points, lag significantly behind the top two ranked options.

Bearing in mind the small margin between Option 4, which mandates the extension of the validity of the Strategy and Action Plan alongside upgrading their quality and preparing a dynamic plan for drafting a new Strategy and the accompanying Action Plan, and Option 2, which mandates the development of an entirely new Strategy and Action Plan, a need arises for additional consultations between key decision-makers within the Government of Montenegro regarding the final choice of the option. When choosing the final option on the approach to further public administration reform, special attention should be paid to the implementation rate of the current Strategy and the potential need to secure additional time for its full implementation, as well as to the fact that the majority of the planned activities in the current Action Plan will remain relevant even after 2026. Furthermore, one should keep in mind the availability of capacities for drafting and implementing a new Strategy under pre-election circumstances and the potential reorganisation of the state administration following the formation of a new Government, as well as the need to demonstrate determination and readiness in executing public administration reform and fulfilling requirements from the European integration process. In other words, Option 4 would allow an additional period for implementing already planned and certainly relevant activities in 2027 as well, thus ensuring a higher level of activity implementation and fulfilment of operational objectives. This would establish a more solid baseline for formulating reform activities in the subsequent planning period (instead of transferring current activities into a new Action Plan). This option would also allow the pre-election period to be utilized for implementing current activities, rather than potentially prolonging the period for drafting and adopting a new Strategy and Action Plan due to the pre-election, election, and new Government constitution periods. On the other hand, Option 2 is fully aligned with the national framework for strategic planning, which mandates continuity in strategic planning, as well as the determination of long-term strategic directions for public administration reform that decision-makers should bear in mind when setting priorities for the work of the next Government.

6.3. Recommendations for the new Strategy and Action Plan

Based on the findings and conclusions of the external evaluation, the following recommendations are provided in the form of methodological guidelines for the preparation of the subsequent Public Administration Reform Strategy and Action Plan:

a) Recommendations regarding strategic and operational objectives and activities:

- Retain the current **strategic objectives**;
- Retain **the majority of operational objectives** that remain relevant for the upcoming period, and determine new operational objectives that will also be relevant for the period when Montenegro becomes an EU member state. Ensure that all operational objectives are formulated in a manner that directly contributes to the achievement of the strategic objectives to which they belong;
- Formulate **activities** capable of adequately targeting the root causes of the identified problems to be resolved and contributing in the most direct way possible to the achievement of operational objectives, so that the contribution of the results achieved through activity implementation to the outcomes at the level of operational objectives is clear (especially those related to the accountability and efficiency of the work of authorities and oversight over their work, upgrading the professionalism of public administration and ensuring greater competition during job vacancy competitions, improving the transparency of the work of authorities and inclusiveness during the drafting of strategic documents and regulations, etc.). Ensure that activities are not fragmented, and consolidate overly dispersed or narrowly defined activities into more comprehensive, outcome-oriented activities. The focus should be on reform activities (rather than on the regular, day-to-day activities of the authorities);

b) Recommendations regarding indicators:

- Determine or formulate **key impact indicators** at the level of strategic objectives (from 1 to 3 impact indicators), in order to enable monitoring of the level of achievement of strategic objectives, as well as the identification and review of the public administration reform's impact in the long term;
- Citizen satisfaction with public services should be designated precisely as one of the impact indicators. Bearing in mind that in the upcoming period it will not be possible to measure user satisfaction through the Balkan Barometer, the recommendation is to include a group of activities in the new Strategy and Action Plan related to the development of a methodology for measuring citizen satisfaction with public services in Montenegro, which should be completed as early as the first year of the new Strategy and Action Plan's validity. It is recommended to involve non-governmental organisations in the drafting of the methodology for measuring user satisfaction with public sector

services in order to better understand user needs in specific areas (e.g., social protection, health care, education, etc.), as well as to include non-governmental organisations in conducting surveys for user satisfaction measurement purposes to obtain the highest quality data, especially from marginalized groups, which would also enable capacity building within the non-governmental sector. In this manner, sufficient time will be left for monitoring service satisfaction and the effectiveness of the Strategy and Action Plan in the period after 2027;

- Determine or formulate **performance indicators** at the level of operational objectives that directly contribute to the achievement of operational objectives, and thereby strategic objectives, i.e., to the attainment of impact indicator target values;
- Establish a smaller number of performance indicators at the level of operational objectives in the upcoming planning period compared to the current number (which stands at around 50), in order to reduce the reporting burden on the public administration, enable efficient and high-quality reporting, and consequently, facilitate implementation monitoring and the effectiveness of the public administration reform;
- Avoid performance indicators that: a) are required to report on multiple values simultaneously (for example, performance indicators reporting at the local and central levels should be separated for easier monitoring), b) are process-oriented in nature, c) are essentially output indicators, meaning they measure the implementation of a specific activity while neglecting the overall outcome of all activities within the operational objective; d) report on partial outcomes, e) cannot be reported on regularly, i.e., at precisely defined time intervals, f) carry a risk of being unreportable for any reason, etc.;
- Formulate **output indicators at the activity level** that are not merely process-oriented and solely qualitative in nature. Determine target values for output indicators if they are quantitative, and if they are process-oriented, they need to reflect all the steps required to be carried out within the given activity for it to be implemented. This means that when formulating output indicators, it is necessary to: a) move beyond the simple confirmation of task execution and the binary "done/not done" approach by introducing qualitative criteria or milestones that enable tracking of progress, quality, scope, and robustness of the results; b) avoid using average indicators without controlling for distribution, and instead use median values or threshold-based indicators; c) avoid target values that imply regulatory perfection such as "100% application" or "full compliance" by introducing gradual steps or clear criteria for substantive compliance; d) avoid percentage-based indicators without a stable reference population; e) use indicators that are, to the greatest extent possible, under direct institutional control. For activities related to improvement in a certain area (for example, capacity building), determine output indicators in such a way that the implementation of the given activities

actually brings about a change, i.e., an improvement in the area (rather than just executing the activity; for example, for activities related to capacity building, the output indicator should not be "drafted analysis of required capacities" because this output indicator does not reflect the capacity building itself). Output indicators for activities of a regulatory nature must be defined to imply the adoption of regulations and their entry into force (rather than just the drafting of a regulation, for example);

- **Select only those impact, performance, and output indicators for which data are available and where the processes of "data production" and their publication in data sources are aligned**, in order to ensure adequate and timely reporting on the values of impact, performance, and output indicators. In other words, select only those indicators for which regular annual reporting can be ensured in the first quarter of the current year for the previous year;

c) Recommendations regarding indicator passports:

- Precisely define indicator passports for each impact and performance indicator, with a clear indicator formula, source of verification, and deadlines within which the achieved indicator values will be available, in order to minimize ambiguities during reporting. For each of the impact and performance indicators, establish clear baseline values, somewhat more ambitious target values in the medium term (depending on the period for which the new Strategy and the first accompanying Action Plan will be valid), and ambitious target values that are simultaneously realistic and achievable in the long term;
- Draft indicator passports in parallel with the development of the Strategy and Action Plan and publish them together with the Strategy and accompanying Action Plan, in order to enhance the transparency of the Strategy and Action Plan themselves, the implementation process, implementation monitoring, and reporting on achievements, as well as the understanding of the passports themselves and the logic of indicator value calculation and reporting on achieved values. Ensure the regular use of indicator passports by the institutions involved in the implementation of the Strategy and accompanying Action Plans and reporting on achievements, with the aim of accurate reporting in accordance with planned deadlines and in the manner envisioned in the indicator passports;

Below are presented the operational recommendations that should be taken into consideration and applied to the greatest extent possible during the preparation of the new Strategy and Action Plan:

- **Ensure broad participation**, not only of municipalities, but also of citizens, representatives of the private and non-governmental sectors, and other stakeholders, during the drafting of the new Strategy and Action Plan;

- **Thoroughly analyze the capacities of lead institutions** to determine their ability to implement planned activities in a timely manner, i.e., to allocate appropriate support for activity implementation if needed in the event of missing capacities. For the analysis of existing and missing capacities, review the results of already conducted and planned functional analyses, at both the central and local levels;
- **Establish the most realistic deadlines possible** for the completion of each activity. An adequate analysis of capacities for activity implementation can assist in this, especially for those activities that represent a prerequisite for other activities;
- **Pay special attention to activities related to inter-municipal cooperation** and the strengthening of cooperation between the central and local levels (regarding data exchange, acting *ex officio*, including the local level in decision-making during the process of drafting laws and strategic documents, etc.);
- **Conduct the most credible and precise assessment possible** of the required financial resources for implementing planned activities, regarding both budgetary and donor funds;
- **Upgrade the reporting system during report preparation** by establishing the possibility of calculating indicators based on the official records of authorities in the first quarter of the year following the reporting year, or updating the annual implementation report of the new Strategy and Action Plan by the end of the second quarter of the year following the reporting year, with the aim of ensuring the most comprehensive reporting possible;
- **Retain the concise and informative reporting format** featured in the latest Report on the Implementation of the Action Plan 2025–2026 of the Public Administration Reform Strategy 2022–2026 for the year 2025. This format enables the presentation of key information on the progress achieved through the elaboration of realized results and outcomes (it contains assessments of performance indicator trends, but should, ideally, also include an assessment of the level of achievement of at least the operational objectives), ongoing activities, and challenges (the challenges section could be more detailed, with a more precise identification of missing capacities to achieve the desired outcomes within each strategic objective). This format also presents the implementation rate of activities by institution in %, and in practice, this method of monitoring has proven effective, as it naturally stimulates competition among competent institutions to achieve higher implementation rates of activities and operational objectives. In any case, a more detailed presentation of the implementation rate by institution would be desirable in the upcoming period. Finally, the section with recommendations, by strategic objectives and competent institutions, is exceptionally useful and contributes to a higher implementation rate of what was planned;

- **Ensure adequate and regular reporting on the expenditure of financial resources** for each of the planned activities, in order to guarantee proper monitoring of the efficiency of the new Strategy and Action Plans;
- **Improve transparency and user experience** when visiting the website of the Ministry of Public Administration, through the publication of all relevant documents related to public administration reform, annual implementation reports of relevant strategic documents, analyses, information on the meetings of the Public Administration Reform Council and the Coordination Team, as well as the annual work reports of these two bodies, etc.
- **Pay greater attention to communication, visibility, and public information** regarding the achievements of the public administration reform in the subsequent planning cycle, in order to strengthen public trust and ensure the sustainability of the reform in the coming years, through: the development and implementation of a communication strategy that would explain the benefits of the reform to citizens, the economy, and other stakeholders; structured communication and information activities; and the use of digital tools and platforms to enhance transparency, public awareness, and accountability;
- **Establish an optimal coordination structure** that would enable the equally important inclusion of both senior management and decision-making levels, as well as the continuous involvement of operational levels in the implementation of the new Strategy and accompanying Action Plan, implementation monitoring, and reporting on achievements. Retain the current level of membership (general directors), while strengthening the operational level through clearly defined duties, thereby ensuring continuity, technical support, and stable communication and coordination between institutions and different management levels. It is mandatory to appoint deputy members from among operational staff who would support the members in a technical and operational capacity and in reality, ensure constant communication between contact persons across all lead institutions. Increase the transparency of the Coordination Team's organization, so that information regarding the structure, organization, and membership of the operational team is publicly available and detailed in the annual implementation reports of the Strategy and Action Plans. Establish regular quarterly meetings of the Coordination Team to monitor progress, identify, and resolve implementation, monitoring, coordination, and reporting challenges (in addition to verifying whether all data required for reporting are available, etc.). SIGMA also proposes significantly more frequent meetings of the Coordination Team and greater involvement of the administrative branch/level. The meetings of the Coordination Team should be attended by both the management and operational levels to enable the exchange of information between these two levels. The role of the Ministry of Public Administration in organizing and holding the meetings of the Coordination Team should be such as to

unambiguously demonstrate that it has control over the public administration reform management process, and to ensure that both the management and operational levels have clear divisions of roles, tasks, and responsibilities;

- **Increase the transparency of the work** of the Public Administration Reform Council and the Coordination Team, through the regular publication of precise information on the activities of the Coordination Team, as well as the minutes from the Coordination Team meetings;
- **In order to ensure better implementation**, but also coordination, monitoring, and reporting on achievements, draft a brief induction guide that can be used by all new managers, specifying what is expected of them and what obligations they assume, so as to improve managerial accountability during the drafting of the new Strategy, the coordination of its implementation, monitoring, and reporting on achievements. Through this guide, and additional guidelines, standardize the process of managing implementation, implementation monitoring, and reporting on achievements to the greatest extent possible;
- **Organize comprehensive capacity building** for the members of coordination teams (for example, within each strategic objective) in order to foster a more structured approach to identifying and defining desired impacts, and to strengthen the link between activity results (outputs), operational objective outcomes (outcomes), and the overall impacts (impacts) of the public administration reform. Generally, the focus should be on further enhancing the strategic planning skills of coordination team members (drafting strategic documents, proper formulation of activities, establishing realistic yet ambitious deadlines, distinguishing between different levels of indicators—input, output, outcome, and impact, properly defining indicators and their baseline and target values, drafting indicator passports, etc.). Capacity building should be conducted before or, at the very latest, in parallel with the drafting of the new Strategy and Action Plan;
- **Consider the possibility of organizing a donor conference** during the drafting process of the new Strategy and Action Plan. The objective would be to precisely define the activities suitable for donor funding and those that will have to be financed from the budget, in order to minimize the risk of a lack of resources in the upcoming period of the new Strategy and Action Plan implementation.

Specific recommendations for activity groups and individual activities are given below as a source of inspiration for formulating activities in the subsequent planning period, bearing in mind the findings and conclusions of the evaluation of the current Strategy and Action Plan:

- In the area of digitalisation, in the first year of implementing the new Action Plan that will accompany the new Strategy, provide for as many preparatory activities for digitalisation as possible when it comes to new information systems, so that in the remainder of the

implementation period the focus can be on the execution itself. For activities that have already been implemented in previous Action Plans, accelerate the process of digitalisation and the development and use of information systems through: the completion of the development, integration, and full operational application of already established information systems to the greatest extent possible; ensuring adequate funding and clear institutional responsibility for the maintenance of information systems after the completion of donor-funded projects; and upgrading digital literacy and conducting training sessions to reduce resistance to new systems and improve their efficient use;

- Provide for an activity to link the ISPI and the Programme Budgeting System (BMIS), with all methodological and technical details, in order to finally establish a direct link between strategic planning and budgetary ceilings, which has been recognized in the sources as a critical prerequisite for the financial sustainability of public policies;
- Provide for an activity related to establishing a comprehensive administrative simplification plan and appointing a working body to manage process optimization, in order to eliminate barriers to business and accelerate the resolution of requests from the business community and citizens. In the next cycle of SIGMA assessments, significantly more attention will be dedicated to administrative barriers and the efforts of public administrations to reduce them;
- Ensure the standardisation of procedures and the alignment of administrative practice through the mandatory application of quality management models and continuous, specialized education of officials for handling administrative procedures and the simplification and digitalisation of services oriented toward user needs, increasing the transparency and predictability of institutional operations;
- Provide for an activity related to the regulatory governance and systemic implementation of human-centered service design, through amendments to the Law on Electronic Administration and accompanying regulations that will introduce an obligation to involve end-users in the process of creating and redesigning public services. This activity must encompass the establishment of standardized channels for collecting user experience feedback (such as online tools and satisfaction surveys), alongside a clear procedural obligation for authorities to analyze, proactively publish, and systematically use the collected data as a key input for improving the quality and accessibility of administrative services. Finally, it is necessary to establish a centralized reporting mechanism on user participation in service design, which would eliminate the current lack of data, ensure the tracking of received suggestions, and strengthen the accountability of institutions for delivering services that truly correspond to the needs of citizens and the economy;
- Provide for an activity relating to the mandatory publication of data on all administrative services in open and machine-readable formats on the Open Data Portal. This activity

should ensure that the collected information on procedures and service providers is transformed into structured databases suitable for reuse;

- Provide for activities for the full operationalisation of transactional electronic services at a high level of sophistication, while eliminating barriers such as non-networked systems, legacy software solutions, and dependence on external vendors, so that citizens and the economy can complete administrative procedures entirely online;
- Provide for the drafting of training programmes for officials at service providers on how to adequately handle vulnerable groups, as well as the implementation of these training sessions;
- Provide for an activity that will improve awareness of electronic public services and their accessibility. It is necessary to ensure that information about services is available in multiple formats (for example, text, audio, video, easy-to-read versions) to meet the diverse needs of all user groups;
- Ensure that the functionalities of digital signature and digital payment are available and accessible to all users;
- Provide for the adoption of the Law on Salaries in the Public Sector which will ensure fairness and fiscal sustainability. It is necessary to directly involve trade unions in the drafting of this law, and it is also necessary to conduct a broad consultative process that would enable the inclusion of the non-governmental sector, as well as other stakeholders, with the aim of drafting legal solutions that will allow both the retention of existing and the attraction of new high-quality staff into the public administration, particularly those possessing scarce competencies (IT audit, IT support, IPA funds management, etc.);
- Provide for an activity that will monitor the annual implementation of analyses in the field of human resources management in accordance with the Methodology for Drafting Analyses in the Field of Human Resources Management, in order to ensure their timely preparation and publication;
- Provide for activities to conduct a gap analysis regarding the deviation of rulebooks on the internal organization and systematisation of positions in state administration bodies from the opinions of the Human Resources Management Authority, and determine the most common and significant deviations. Based on the findings, determine whether and in what manner it is possible to prevent these deviations in the upcoming period to reduce the possibility of adopting rulebooks that deviate from the Authority's opinion. Include the share of rulebooks on internal organization and systematisation of positions with a positive opinion from the Human Resources Management Authority relative to the total number of adopted rulebooks on internal organization and systematisation of positions in state administration bodies as a performance indicator at the level of the

operational objective (in 2024, not a single systematisation had a positive opinion from the Human Resources Management Authority);

- Consider the need to include the indicator "Share of engaged persons under service contracts relative to the total number of employed and engaged persons in public administration" among the performance indicators for the new Strategy and Action Plan, while ensuring quarterly reporting by the Commission for the Analysis and Monitoring of Service Contracts on the number of persons engaged under service contracts and contracts for occasional and temporary work so that these data are regularly available for monitoring and determining the need for corrective measures;
- Provide for an activity to conduct an analysis of the recruitment of persons from specific fields of education, determine the reasons for the insufficient interest of these individuals in working in public administration, and design activities to attract them;
- Provide for an activity related to innovating and strictly applying the Methodology for Drafting Reports on the Management of State Administration, alongside its harmonization with new legal solutions concerning the limitation of the mandate of acting officials and the obligation to select the highest-ranked candidate, as well as the regular publication of these reports on an annual basis;
- Provide for an activity related to the timely preparation and publication of the recruitment plan in state administration bodies for the following year in an open data format;
- Provide for activities for the full application of the Competency Framework in all phases of human resources management, particularly in recruitment and performance evaluation procedures;
- Provide for a legislative amendment activity that would clearly limit and precisely regulate the procedure for using service contracts and other forms of temporary engagement within the context of public administration, enable enhanced oversight by the Commission for the Analysis and Monitoring of Service Contracts and Contracts for Temporary and Occasional Work over the operations of spending units, and prevent the abuse of temporary engagements for positions that are already systematized within authorities, thereby directly contributing to transparency and more efficient budget management;
- Provide for an analytical activity that will determine the reasons for the low share of evaluated civil servants (35.77% in 2025) by categories of officials and, based on the findings of the analysis, prepare corrective measures (including, among other things, the drafting of the Decree on the Performance Evaluation of State Officials and Employees with the aim of upgrading the evaluation system based on work results and competencies);

- Provide for activities of enhanced oversight over authorities regarding the employment of state officials and employees, the fulfilment of obligations to conduct evaluations, the determination of the Training Plan, and the promptness of data entered into the CPR, as well as strengthening the capacity of the Human Resources Management Authority to conduct this oversight;
- Intensify the implementation of activities related to linking budgetary planning with the determination of the Personnel Plan, and drafting the Personnel Plan together with budgetary planning, to ensure that the Personnel Plan has a realistic impact on the budget. In addition to the above, it is recommended to supplement the contents of the Personnel Plan with a timeline by months or quarters indicating when authorities plan to initiate advertising procedures for specific positions, as well as forming a special working group to monitor the degree of fulfilment of Personnel Plans;
- Provide for activities to motivate candidates for public advertisements and public job vacancy competitions. It is necessary for these activities to be directed toward conveying a message about all the advantages offered by employment in the public administration, but also toward increasing trust in the competition procedure and the equality of candidates in the selection process;
- Provide for an analysis of possible options to achieve greater inclusiveness in public administration recruitment, as well as the identification of specific positions to which persons with a certain degree of disability could be assigned;
- Provide for activities to involve non-governmental organisations in prioritizing data publication on the open data portal in order to obtain feedback on the significance of certain data for the public, all with the aim of raising the level of transparency of public administration operations and reducing the number of requests for free access to information;
- Provide for activities that will lead to upgrading the development of dialogue culture and skills among civil servants when involving the public in the process of preparing regulations and public policy documents. The administrative capacities of state authorities have been assessed as limited, pointing to the need for their additional strengthening in order to achieve better communication with stakeholders;
- Provide for an activity related to establishing binding standards for conducting public consultations as early as the earliest phase of preparing all regulations (not only laws) and strategic documents, alongside the use of innovative methods that ensure substantive inclusiveness rather than merely publishing documents on websites;
- Ensure strict and consistent compliance with the legal obligation to conduct public consultations and publish reports on the conducted public debate, which must contain detailed explanations on the acceptance or rejection of each submitted suggestion,

alongside the introduction of a control mechanism that will not permit the processing of an act toward the Government until this obligation is fulfilled;

- Provide for a promotion activity for the e-Participation portal in order to enable citizens and civil society to track the outcome of their initiatives in real time, obtain adequate feedback on their comments and suggestions, and increase public participation in shaping and making decisions;
- Provide for an activity relating to upgrading the transparency of the work of working groups in charge of drafting regulations and strategic documents through introducing an obligation to regularly publish materials from their sessions, such as minutes, draft working versions, and conclusions. The objective is to ensure that the work of these bodies is public and accessible in real time, thereby strengthening inclusiveness and preventing civil society participation in the preparation of regulations from remaining at a formal level or being postponed until the moment when solutions in the regulations have already been formulated;
- Provide for an activity related to ensuring the availability of data from the Medium-Term and Annual Government Work Programme, the Programme of Accession of Montenegro to the EU (PPCG), and accompanying implementation reports, specifically in open and machine-readable formats via the Open Data Portal (data.gov.me), with the aim of enabling data reuse, advanced analytics, and more efficient tracking of public policy performance by citizens, the economy, and the non-governmental sector.

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Annex 1.

Framework questions for focus groups for the external evaluation of the Public Administration Reform Strategy 2022–2026 and the accompanying Action Plans for the period 2022–2024 and 2025–2026

RELEVANCE (to what extent is the public administration reform as a whole, and some of its parts – still relevant compared to the period when the Public Administration Reform (PAR) Strategy and the accompanying Action Plan were adopted)

Priority needs and identified problems

- Do you think that the strategic and operational objectives of the PAR Strategy and Action Plan are relevant and adequate in relation to the problems they need to resolve and for satisfying priority needs (needs of the public administration and users of public administration services)? If you think they are not – why aren't they? Is that the reason for the current level of achievement of results and outcomes?
- Do you think that the activities in the PAR Action Plan 2022–2024 and the PAR Action Plan 2025–2026 are relevant and adequate for achieving outcomes at the level of operational objectives and that they can contribute to achieving operational objectives? If you think they are not – why aren't they? Is that the reason for the current level of goal achievement?
- Do you think that the existing activities from the PAR Strategy and the Action Plan are:
 - o Relevant and acceptable for the institutions involved in the implementation of the PAR Strategy and Action Plan, civil servants, and local officials, especially taking into account Government priorities and the priorities and needs of public resource users? Why do you think so?
 - o Relevant and acceptable for citizens, the private sector, and the non-governmental sector? Why do you think so?
 - o To what extent are the PAR Strategy and accompanying Action Plans relevant in relation to the needs of women and men?

Cross-sectoral needs

- In what way has the implementation of the Strategy and Action Plans influenced the establishment of inter-departmental cooperation at the central and local levels? Have formal procedures on cooperation between authorities been established? Has perhaps inadequate inter-departmental cooperation affected the implementation rate of activities, and in what way?

- To what extent did the establishment of the Coordination Team (2024) influence the improvement of inter-institutional cooperation, and in what way?
- Do you consider that the focus on digitalisation, such as the introduction and application of eDMS, SISEDE (Single Information System for Electronic Data Exchange), and other electronic tools, was aligned with the needs of all portfolios, or were there differences in readiness (capacity-wise and general) among institutions?
- To what extent was the local level involved in the drafting, and is now involved in the implementation of the PAR Strategy and Action Plan?

Relationship between goals and capacities

- To what extent did the planned goals and activities correspond to the implementation capacities in Montenegro? To what extent did the stakeholder institutions create and incorporate into their plans and systems the necessary feedback loop and monitoring mechanisms that will ensure self-renewal (adaptation) in order to achieve the goals?
- Reports state that the deadlines in the Action Plan 2022–2024 were "ambitiously set." Are these deadlines in the second cycle (2025–2026) better adapted to the actual number of officials and other capacities and resources at your disposal?
- At the time the Strategy and Action Plan 2022–2024 were established, did your institution possess internal expertise for the implementation of complex activities from the Strategy, or did you rely on external support?
- Did the local level, at the time the Strategy and Action Plan 2022–2024 and Action Plan 2025–2026 were established, possess adequate capacities for the implementation of the planned activities?

COHERENCE (to what extent is the strategic document aligned)

- To what extent are the Strategy and Action Plans mutually aligned (operational with strategic objectives, activities with objectives, etc.)?
- To what extent are the Strategy and Action Plans aligned with Government priorities and other strategic documents?
- To what extent are the Strategy and Action Plans aligned with international standards in the field of PAR, including the areas of gender equality and environmental protection?

EFFECTIVENESS (to what extent have the set strategic and operational objectives been fulfilled, and the planned results, outcomes, and effects/impacts achieved)

Achievement of goals and activities:

- Are the set strategic and operational objectives being achieved and to what extent, i.e., is the implementation moving in the right direction toward reaching the performance indicator target values envisioned for the end of 2026?
- Do you think that the identified problems for which the PAR Strategy and Action Plan were adopted have been resolved, i.e., have the planned changes for which the PAR Strategy and Action Plan were adopted been achieved? Provide examples if possible.
- How well did each intervention/measure/activity contribute to achieving the outcomes and goals? Do you consider that the planned activities in the Action Plan were truly appropriate for the problems that needed to be resolved, or were they merely formal steps that could not significantly move the indicators? Provide examples if possible.

Causes of success or failure:

- Specify the areas for which you consider effectiveness to have been high and the reasons that contributed most to high effectiveness (driving forces/success factors)?
- Specify the areas for which you consider effectiveness to have been low and the reasons that contributed to the low effectiveness of stakeholders, explaining the lack of progress (restraining forces, e.g., government turnarounds, reorganisation of state administration, cyberattacks, inadequacy of activities, inadequate indicators, short deadlines, non-implementation, lack of political will, lack of financial resources, external factors, emergence of new problems, etc.)?

Unexpected changes:

- What unexpected positive and negative changes (if any) occurred, including those related to cross-departmental issues, for all five objectives defined in the PAR Strategy 2022–2026?
- Quality and accessibility of public services (primarily for Strategic Objective II, but ask for Strategic Objective I as well due to the protector of citizens and the accessibility of local self-government units):
- To what extent have the accessibility and quality of public service delivery been improved (digitalisation, measuring satisfaction with public services)? Which factors stimulate, and which factors limit the accessibility and quality of public services (e.g., cyberattacks, inadequate inter-institutional cooperation, low trust in institutions)? Provide examples if possible.
- Do you consider that public services correspond to the needs of citizens and the economy?

EFFICIENCY (measures the relationship between achieved effects (results, outcomes, and impacts) and the resources committed to achieving them, i.e., whether and to what extent the resources committed are used economically (funds, expertise, time) and converted into results)

Time to achieve goals and implement activities

- Were the planned activities implemented in the manner envisioned by the PAR Strategy and Action Plan?
- What are the key problems identified in the implementation of the PAR Strategy and Action Plan? What are the causes and consequences of the identified problems?
- Were there delays in the implementation of activities and the achievement of goals compared to the planned deadlines, and why? Have the main factors and causes of the delays been eliminated?
- Were there any unimplemented activities, and why? Is the implementation of existing activities in the Action Plan 2025–2026 uncertain, and why?
- What measures have been taken to better implement the activities of the PAR Strategy and Action Plan in whose implementation you participate? (better coordination, informational, educational, and institutional-managerial activities, digitalisation, etc.)

Availability and efficient use of financial resources

- Are the funds planned for the implementation of activities from the PAR Strategy and Action Plan sufficient to achieve the goals and planned effects (results, outcomes, and impacts)? (especially regarding the digitalisation of public services)
- Are the planned funds spent efficiently to implement the planned activities, i.e., are the costs proportionate to the achieved benefits? Was this a prerequisite for the results achieved so far (results, outcomes, and impacts)?
- Has it been observed that any activities from the PAR Strategy and Action Plan lead to inefficient spending of resources, duplication of competences, undefined roles/competences, or an absence of defined competence?

Capacities for coordination and monitoring:

- Do you think that the existing institutional and organizational structure of PAR coordination is efficient? Why?

- In what way do you assess the coordination of the Strategy and Action Plan execution, implementation monitoring, and reporting before and after the establishment of the Coordination Team?
- How is implementation coordinated within the strategic objective(s) of the PAR Strategy and Action Plan in whose implementation you participate? Has your institution improved the coordination of activity execution, monitoring, and reporting on activity implementation and indicator values in the meantime, since the beginning of the PAR Strategy implementation?
- Are there processes, procedures, or practices related to implementation or implementation coordination that you consider inefficient? Why do you think they are inefficient? Do you have suggestions for improvement?
- How are implementation and achieved results reported?
- What do you think about the indicators in the PAR Strategy and Action Plan? What are the reasons for the observed irregular reporting against each of the indicators (difficulties in data collection, lack of capacity to maintain records, difficulties in assessing target value achievement)?
- Are there processes, procedures, or practices related to reporting and reporting coordination that you consider inefficient? Do you have suggestions for improvement?

IMPACT

- Which target groups and other stakeholders have been influenced by the PAR Strategy and Action Plan since the beginning of their implementation, and in what way?
- In what way has the implementation of the Strategy and Action Plan affected the position of women and the position of men in society?
- What direct and indirect, positive and negative, planned and unplanned impacts of the PAR Strategy and Action Plan have been achieved in practice regarding the target groups and other stakeholders (the administration, the economy, and citizens) and the environment, and to what extent (determine their magnitude, if possible), with special reference to vulnerable social groups and gender equality?

SUSTAINABILITY (whether and to what extent the benefits of the PAR Strategy and Action Plan exist and continue to exist after the expiration of these two documents)

Financial sustainability and future interventions

- Given that a large portion of the reform activities (such as the EU4PFM project or CEF support) is financed from donor funds, to what extent are the budgets of your institutions

ready to take over the costs of maintenance and further upgrade of the established IT systems and their networking, as well as the digitalisation of public services, and other achievements after external funding ends? Provide examples if possible.

- Do you consider that the Sector Budget Support (SBS) mechanism motivated your institution to permanently change its way of working, or was the fulfillment of indicators viewed merely as a one-time condition for withdrawing fund tranches?

Sustainability of capacities

- Do resources (information technologies, material assets, human resources with the necessary knowledge and skills) exist in your institution for the further, full implementation of the PAR Strategy and Action Plan activities as envisioned, and for maintaining the achievements of the Strategy after its implementation deadline passes?
- Has participation in the implementation of the strategy improved the capacities of your institution or not, and in what way?
- Which factors influence the sustainability of capacities in your institutions (e.g., the reorganisation of state administration bodies, the departure of civil servants to the private sector or other authorities, the possibility of recruiting scarce professional staff such as IT experts)?
- Does the local level possess adequate capacities for the sustainability of the Strategy's achievements?

Consequences of suspending or withdrawing actions

- Do you think that the full implementation of activities from the PAR Strategy and Action Plan related to digitalisation and greater use of IT infrastructure and tools contributes to the sustainability of the public administration reform? In your opinion, what would be the greatest risks to your portfolio if the digital transformation process were stopped now?
- If control mechanisms such as RIA analyses or evaluations of strategic documents were withdrawn, how would that affect the policy-making process?
- What would be the key change in the way of working that would ensure that the results achieved last for years beyond 2026?

Annex 2.

Evaluation criteria, detailed evaluation questions, and evaluation methods

Evaluation Criteria	Evaluation Questions	Evaluation Methods
Relevance	○ To what extent are the planned objectives of the Public Administration Reform Strategy 2022–2026 and the activities in its Action Plans for the periods 2022–2024 and 2025–2026 still relevant to priority needs, including cross-departmental needs? ○ To what extent did they correspond to the implementation capacities in Montenegro?	○ Stakeholder mapping, focus groups with representatives of institutions participating in the implementation, and discussions with representatives of the Ministry of Public Administration responsible for coordination, monitoring, and reporting, and SIGMA representatives; ○ Systematic review and analysis of available documentation, reports, and pre-existing analyses.
Coherence	○ To what extent is there synergy and interrelation between the strategic document and other documents implemented by the Government? ○ Is there alignment of the strategic document with relevant international norms and standards?	○ Focus groups with representatives of institutions participating in the implementation, and discussions with representatives of the Ministry of Public Administration (MPA) and SIGMA representatives; ○ Systematic documentation review using structural tools; ○ Analysis of performance data from the monitoring and reporting system for the Strategy and Action Plans; ○ Analysis of data on national indicators.
Effectiveness	○ To what extent have the strategic objectives of the Strategy been achieved? Has and how well has each intervention/measure contributed to achieving the results? ○ What unexpected positive and negative changes (if any) occurred, including those related to cross-departmental issues, for all five objectives defined in the Strategy? ○ In areas where effectiveness was high, which stakeholder measures contributed most to high effectiveness (driving forces/success factors)? In areas where effectiveness was low, which stakeholder measures explain the lack of progress (restraining forces)? ○ To what extent have the accessibility and quality of service delivery been achieved? How does Montenegro rank in terms of service delivery digitalisation compared to the best	○ Focus groups with representatives of institutions participating in the implementation, and discussions with representatives of the Ministry of Public Administration responsible for coordination, monitoring, and reporting, and SIGMA representatives; ○ Structured analysis of available documentation and analyses; ○ Analysis of performance data from the monitoring and reporting system for the Strategy and Action Plans; ○ Mapping of identified risk analyses/applied mitigation measures; ○ Online questionnaires with specific questions regarding the indicators; ○ Contribution analysis to determine progress against intended results and created pathways.

	digitalisation practices of service delivery systems in previously selected EU countries?	
Efficiency	○ Were the capacities for the coordination and monitoring of the implementation of the Strategy and its Action Plans adequate? To what extent did the stakeholder institutions create and incorporate into their plans and systems the necessary feedback loop and monitoring mechanisms that will ensure self-renewal (adaptation) in order to achieve the goals? ○ Were the objectives of the two Action Plans for the Strategy achieved on time, what are the main factors and causes that influenced potential delays, and how were they resolved? ○ Were the financial resources efficiently utilized to support the implementation of the PAR Strategy? Did they lead to an improvement in the PAR Strategy's indicators?	○ Systemic analysis of management and coordination structures; ○ Systemic analysis of the Strategy and accompanying Action Plans; ○ Financial analysis of expenditure per strategy/intervention; Analysis of performance data from the monitoring and reporting system for the Strategy and Action Plans; ○ Focus groups with representatives of institutions participating in the implementation, and discussions with MPA and SIGMA representatives.
Impact	○ To what extent has the general objective of the PAR Strategy been achieved? What actual changes for the better has the Strategy achieved for users (the administration, the economy, and citizens)?	○ Focus groups with representatives of institutions participating in the implementation, and discussions with MPA and SIGMA representatives; ○ Systematic documentation review using structural tools; Analysis of performance data from the monitoring and reporting system for the Strategy and Action Plans; ○ Analysis of data on national indicators; ○ Online questionnaires with specific questions regarding the indicators.
Sustainability	○ To what extent are future PAR interventions sustainable in terms of funding, and to what extent are the capacities of stakeholders for the PAR Action Plans sustainable? ○ What would be the most likely consequences of suspending or withdrawing the current operations of the PAR Strategy?	○ Focus groups with representatives of institutions participating in the implementation, and discussions with MPA and SIGMA representatives; ○ Systematic review and analysis of available documentation, reports, and pre-existing analyses; ○ Online questionnaires with specific questions regarding the indicators.

Annex 3.

Unavailable data on performance indicator values at the level of operational objectives at the end of 2024 and 2025

Table 1. Unavailable data on performance indicator values at the level of operational objectives until the end of 2024

Operational Objective	Indicator	Note
Operational Objective 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	% of institutions in which a reporting system has been established at the level of outcome and goal indicators that would enable monitoring of results achievement with programme budget implementation indicators	Monitored through another indicator
Operational Objective 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	Number of administration bodies over which administrative oversight was conducted by the line ministry	The methodology has not been drafted, and administrative oversights were not conducted
Operational Objective 2.1 More efficient service delivery and introduction of quality management of provided services	Percentage of administrative acts overturned by the Administrative Court	Reason not stated
Operational Objective 3.1 Efficient personnel planning system based on identified needs, depoliticisation and improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system	Number of HR functions where records are kept only through the Human Resources Information System	Reason not stated
Operational Objective 3.2: Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development	Percentage of civil servants who were promoted or rewarded based on their performance evaluation	Reason not stated
Operational Objective 4.3 Improving the reuse of information and increasing the availability of open data	Number of published high-value datasets with API access on the Open Data Portal	Reason not stated
Operational Objective 4.3 Improving the reuse of information and increasing the availability of open data	Share of public authorities proactively publishing information in accordance with the Law on FAI	Due to frequent reorganisations, it is not possible to display the indicator value

Table 2. Unavailable data on performance indicator values at the level of operational objectives for 2025

Operational Objective	Indicator	Note
Operational Objective 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	% of institutions in which a reporting system has been established at the level of outcome and goal indicators that would enable monitoring of results achievement with programme budget implementation indicators	Monitored through another indicator
Operational Objective 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	% of recommendations implemented by public administration bodies based on the Report of the Protector of Human Rights and Freedoms – Ombudsman	The Report of the Protector of Human Rights and Freedoms – Ombudsman was not available at the time of drafting the report
Operational Objective 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	Number of administration bodies over which administrative oversight was conducted by the line ministry	The methodology has not been drafted, and administrative oversights were not conducted
Operational Objective 2.1 More efficient service delivery and introduction of quality management of provided services	Citizen satisfaction with public services (Balkan Barometer)	The Balkan Barometer has changed its methodology
Operational Objective 2.1 More efficient service delivery and introduction of quality management of provided services	Percentage of administrative acts overturned by the Administrative Court	The 2023 and 2024 Report on the Implementation of the Law on Administrative Procedure was not available
Operational Objective 2.2 Full interoperability of information systems and an increase in the number of electronic services at a high level of sophistication	Percentage of electronically submitted applications relative to the total number of applications submitted by users for the use of the pilot service	Data are unavailable because the services are located on different platforms, which prevents their aggregate presentation due to organizational changes
Operational Objective 3.2 Efficient personnel planning system based on identified needs, depoliticisation and improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system	Percentage of civil servants who were promoted or rewarded based on their performance evaluation	It is not stated why a number was provided instead of a percentage
Operational Objective 3.2 Efficient personnel planning system based on identified needs, depoliticisation and	Percentage of state authorities, state administration bodies and	The analysis was not conducted. It will be biennial.

improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system	local self-government units that strategically plan training	
Operational Objective 3.2 Efficient personnel planning system based on identified needs, depoliticisation and improvement of the human resources recruitment procedure and further digitalisation in the field of the civil service system	Percentage of institutions measuring the satisfaction of state and local civil servants	The analysis was not conducted. It will be biennial
Operational Objective 4.3 Improving the reuse of information and increasing the availability of open data	Share of public authorities proactively publishing information in accordance with the Law on FAI	Due to frequent reorganisations, it is not possible to display the indicator value in %.
Operational Objective 5.1 Strengthening the data-based planning system that leads to the creation of sustainable policies and the achievement of Government priorities	Percentage of public policy consultations conducted in accordance with the legal framework and SIGMA principles relative to the number of acts adopted by the Government that are subject to public consultations	The Report on the application of the Decree on the selection of NGO representatives to working bodies of state administration organs and the conduct of public debates in the preparation of laws and strategies for 2025 is planned by the Work Programme of the Government of Montenegro for the second quarter of 2026
Operational Objective 5.3 Increasing the scope and strengthening the capacity for RIA implementation	Percentage of laws for which the Standard Cost Model is applied to RIA	The RIA report has not been drafted
Operational Objective 5.3 Increasing the scope and strengthening the capacity for RIA implementation	Percentage of high-quality RIAs relative to the total number of RIAs submitted to the MoF for opinion	The RIA report has not been drafted

Annex 4.

Activities for which the implementation of planned funds was not reported at the end of 2024

Table 1. Activities from the Action Plan 2022–2024 for which the implementation of planned funds was not reported at the end of 2024

Operational Objective	Number	Activity	Planned Funds
OPERATIONAL OBJECTIVE 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	1.1.20	Drafting an Analysis with recommendations on the duration of administrative-judicial disputes in administrative-public cases	25,000.00 €
OPERATIONAL OBJECTIVE 1.1 Functional public administration with efficient oversight over its work and application of the concept of managerial accountability	1.1.29	Drafting a Communication Plan on public administration that promotes diversity, equality, non-discriminatory policies, and equal opportunities, taking into account a sectoral approach to these topics	30,000.00 €
OPERATIONAL OBJECTIVE 1.3 Strengthening functional and financially independent municipalities to ensure a more balanced development of all local self-government units	1.3.2	Adoption of a Plan with recommendations based on the findings of the Analysis from activity 1.3.1	9,000.00 €
OPERATIONAL OBJECTIVE 1.3 Strengthening functional and financially independent municipalities to ensure a more balanced development of all local self-government units	1.3.5	Drafting an analysis of challenges in the collection of local public revenues and the fiscal capacities of local self-government units	13,000.00 €
OPERATIONAL OBJECTIVE 2.1 More efficient service delivery and introduction of quality management of provided services	2.1.4	Establishing a Quality Management Network in public administration	18,000.00€
OPERATIONAL OBJECTIVE 2.2 Full interoperability of information systems and an increase in the number of electronic services at a high level of sophistication	2.2.1	Realisation of the project „Montenegro Digital“	1,900,000.00 €
OPERATIONAL OBJECTIVE 2.2 Full interoperability of information systems and an increase in the number of electronic services at a high level of sophistication	2.2.4	Analyzing the methods of maintaining and managing registries of state public administration bodies and local self-government units	7,000.00 €

OPERATIONAL OBJECTIVE 2.2 Full interoperability of information systems and an increase in the number of electronic services at a high level of sophistication	2.2.9	Establishing an efficient audit of information systems (IS) and electronic services in state administration bodies	27,000.00 €
OPERATIONAL OBJECTIVE 2.2 Full interoperability of information systems and an increase in the number of electronic services at a high level of sophistication	2.2.11	Drafting an Analysis of needs and existing tools to support the work of IS audit, with a focus on the use of CAAT software	8,000.00 €
OPERATIONAL OBJECTIVE 3.2 Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development	3.2.11	Promotion of the work of the Human Resources Management Network at the central level	9,000.00 €
OPERATIONAL OBJECTIVE 3.2 Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development	3.2.16	Creating mentorship modules for leadership in public administration	23,000.00 €
OPERATIONAL OBJECTIVE 3.2 Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development	3.2.22	Upgrading missing knowledge in the area of digital skills for future positions of IT engineers in public administration	307,000.00 €
OPERATIONAL OBJECTIVE 3.2 Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development	3.2.30	Upgrading the Employee Satisfaction Measurement System in public administration	22,500.00 €
OPERATIONAL OBJECTIVE 3.2 Public administration an attractive employer – an efficient system of evaluation, promotion and rewarding based on the merit system and continuous professional development	3.2.31	Conducting training sessions for contact persons in human resources management units on the employee satisfaction measurement procedure	22,500.00 €
OPERATIONAL OBJECTIVE 3.3 Optimal administration	3.3.2	Upgrading the regulatory framework governing the public sector salary system	7,000.00 €

OPERATIONAL OBJECTIVE 3.3 Optimal administration	3.3.3	Amending the Labour Law	3,000.00 €
OPERATIONAL OBJECTIVE 3.3 Optimal administration	3.3.4	Establishing an efficient mechanism regarding the conclusion of Service Contracts and Contracts for Temporary and Occasional Work	17,000.00 €
OPERATIONAL OBJECTIVE 3.3 Optimal administration	3.3.6	Coordination of the implementation of recommendations for public administration optimization (including the drafting of functional analyses)	407,000.00 €
OPERATIONAL OBJECTIVE 4.1 Improving the functioning of the legal protection system in the field of FAI and strengthening the capacity of the Agency for Personal Data Protection and Free Access to Information	4.1.4	Upgrading the functioning of the AZLP information system and data publication	87,000.00 €
OPERATIONAL OBJECTIVE 4.2 Improving the application of the Law on FAI by those bound by the law and strengthening the capacity of users of the law, to ensure the adequate exercise of the right to access information	4.2.10	Providing support to authorized persons in public authorities through the formation of a network of authorized persons	2,000.00 €
OPERATIONAL OBJECTIVE 5.1 Strengthening the data-based planning system that leads to the creation of sustainable policies and the achievement of Government priorities	5.1.1	Drafting a supplemented methodology for the medium-term work planning of the Government and ministries	9,800.00 €
OPERATIONAL OBJECTIVE 5.1 Strengthening the data-based planning system that leads to the creation of sustainable policies and the achievement of Government priorities	5.1.11	Drafting a list of standard costs for strategy development	2,400.00 €
OPERATIONAL OBJECTIVE 5.1 Strengthening the data-based planning system that leads to the creation of sustainable policies and the achievement of Government priorities	5.1.18	Upgrading the report on the application of the Decree on the selection of NGO representatives to working bodies of state administration organs and the conduct of public debates in the preparation of laws and strategies	5,000.00 €

Annex 5.

Multi-Criteria Analysis – Calculation

Table 1. Considered options, criteria, weights, and calculated values for each of the considered options

Criteria	Weight	Option 1: Status Quo – No intervention but with further implementation of unfinished activities		Option 2: Drafting a new Strategy and Action Plan		Option 3: Extension of the validity period of the current Strategy and Action Plan alongside the preparation of a dynamic plan for drafting a new Strategy and the accompanying Action Plan		Option 4: Extension of the validity period of the Strategy and Action Plan alongside upgrading the quality of these documents and preparing a dynamic plan for drafting a new Strategy and the accompanying Action Plan	
		Number of points	Weighted value	Number of points	Weighted value	Number of points	Weighted value	Number of points	Weighted value
Effectiveness	0,2	1	0,2	3	0,6	2	0,4	4	0,8
Efficiency (ratio between spent resources and outputs)	0,1	2	0,2	1	0,1	4	0,4	3	0,3
Compliance with EU standards and SIGMA principles	0,15	1	0,15	4	0,6	2	0,3	3	0,45
Sustainability	0,15	1	0,15	3	0,45	2	0,3	4	0,6
Continuity and consistency regarding national strategic planning requirements	0,2	1	0,2	4	0,8	2	0,4	3	0,6
Transparency and inclusiveness	0,1	1	0,1	4	0,4	2	0,2	3	0,3
Feasibility (technical and political)	0,1	4	0,4	1	0,1	3	0,3	2	0,2
Total			1,4		3,05		2,3		3,25