Background Document for the Open Public Consultation on the Thematic Evaluation of EU Support to Public Administration Reform (PAR)

The global objective of this external thematic evaluation is to contribute to better design, programming and implementation of EU assistance to PAR over the remainder of the period 2014-2020, and beyond. Its specific objectives are to: (i) Assess the performance of PAR related assistance to beneficiaries¹ funded under the IPA I and in selected Neighbourhood countries under the European Neighbourhood and Partnership Instrument (ENPI) over the period of 2007-2013; (ii) Assess whether the support provided would credibly achieve the results sought under PAR related assistance foreseen under IPA II and under ENI² in selected Neighbourhood countries; and (iii) Draw lessons from these past and on-going experiences and provide recommendations for the EC to improve its policy and financing instruments on how further improve integration of PAR as a priority, including cross-fertilisation between IPA and ENI programmes.

This background document has been prepared by external consultants and represents the authors’ points of view which are not necessarily shared by the European Commission or by the authorities of countries involved. Two mutually reinforcing considerations underpin EU support to PAR and explain its priority for the beneficiaries. First, IPA II beneficiaries aim to meet the requirements of the acquis, which include areas covered by PAR. Similarly, neighbourhood countries wish to adopt international good practices, as reflected by EU norms. Second, as middle-income beneficiaries in transition improved public administration is expected to enhance their socio-economic outcomes.

The evaluation covers a sample of fourteen beneficiaries composed of seven candidates or potential candidates of enlargement (Turkey; Serbia; Albania; Bosnia and Herzegovina; Montenegro; the former Yugoslav Republic of Macedonia; and Kosovo³) and seven neighbourhood ones (Jordan; Georgia; Armenia; Ukraine; Moldova; Tunisia; and Morocco).

PAR is a fundamental requirement of the EU, reflected in the “acquis”⁴ and is a key priority under its enlargement strategy⁵ in order to ensure the development of well-functioning democratic institutions. The evaluation covers the “horizontal” aspects of PAR through the six PAR core areas, as outlined in the Enlargement strategy 2014-15. They are defined in detail by the Principles of Public Administration, developed by the OECD/SIGMA⁶ in cooperation with the Commission in 2014 for the EU candidates and potential candidates. The six core areas are the following: (i) strategic framework for public administration reform; (ii) policy development and coordination; (iii) public service and human resources management; (iv) accountability; (v) service delivery; and (vi) Public Financial Management (PFM). This framework supports a new more integrated PAR approach whereby the design of EU assistance and policy dialogue are more closely inter-linked than before. Since 2016 the same PAR policy framework applies to the Neighbourhood countries and the Principles of Public Administration have been adapted to the neighbourhood context. In the case of IPA II beneficiaries, the steering of PAR is further helped by annual high level policy dialogue,

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¹ Croatia was an IPA I beneficiary, but joined the EU in 2013. The Icelandic government has decided to put the EU accession negotiations on hold. In this context, the European Commission, in agreement with the Icelandic government, has suspended preparatory work on IPA for the period 2014-2020. As a consequence neither will be covered by this evaluation.
² http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ%3AL%3A2014%3A077%3A0027%3A0043%3AEN%3APDF
³ This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.
⁶ http://sigmaweb.org/
known as PAR Special Groups, between the Commission and the national authorities, and biannual SIGMA baseline studies which provide a roadmap consisting of detailed short and medium-term actions. Annual assessments by the Commission of progress on PAR (inter alia) and recommendations are also provided in the annual country reports, collectively known as the “Enlargement package.” Upon request, SIGMA assessments are also carried out in neighbourhood countries while policy dialogue is usually through donors’ committees. EU support prior to the adoption of the PAR policy framework tended to be more fragmented but still covered some of the same areas, notably PFM and Civil Service Reform.

“Vertical” or sectoral aspects related to service delivery and outcome in specific sectors (e.g.; education and health) are not covered here, even though PAR should contribute to their efficiency and effectiveness. For instance, new civil service laws and regulations may apply to civil servants working for local governments, as may PFM rules.

EU support can be thought of as being composed of policy dialogue, explained above, and complemented by financial assistance. Financial assistance includes Technical Assistance (TA), including SIGMA, Twinning, TAIEX and consultants recruited through tenders, as well as projects and budget support. The latter has been extended to some IPA beneficiaries quite recently.

This external evaluation uses a mixed methodology whereby documentary reviews are complemented by interviews with EU Staff, Government counterparts, donors, representatives of the civil society, and field visits to Montenegro, Serbia, Albania, Georgia and Morocco. While documentation related to programming and its results tend to be readily available from public sources, very few completed operations have been evaluated through an external process. This approach aims to provide qualitative and quantitative answers covering 10 broad evaluation criteria, discussed in more detail below, through 24 Evaluation Questions (EQ). Each evaluation question is answered on the basis of judgement criteria (JC) and indicators developed by the consultants as part of the methodology and approved by the EU. The evaluation is on-going, and preliminary findings are presented to seek responses from the public. Detailed answers according to criteria/EQ/JC and indicators with full references to evidence will be provided in the final report.

II. Evaluation Criteria and Questions (EQ) with preliminary findings

This section is based on work in progress, findings are preliminary and are solely the responsibility of the contractor. The findings in some areas (e.g.; relevance) are based on a fairly complete review of documentation, while others (e.g.; impact) are tentative. The preliminary findings below consolidate the experience as understood by the evaluators in the 14 beneficiaries reviewed. For some specific issues, the beneficiaries’ experience is quite similar, notwithstanding that some countries are more advanced in PAR than others or have a different Public Administration culture and starting point. In other cases, there is a broader range of experience which is briefly summarized in the preliminary findings.

1.a. Relevance – Objectives

EQ 1: What is the relevance of EU intervention to accession? Enlargement countries only
EQ 2: Is there good alignment between EU strategies and action plans of the relevant periods?
EQ 3: Is there good alignment with national strategies?

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7 The purpose of these dialogue structures, in the framework of the Stabilisation and Association Agreement, to initiate a regular policy dialogue between the Commission and Governments in order to discuss the reform of the public administration based on six key areas.
8 https://ec.europa.eu/neighbourhood-enlargement/tenders/twinning_en
9 https://ec.europa.eu/neighbourhood-enlargement/tenders/taix_en
Interviews, carried out so far, with Government officials confirm that in their opinion EU interventions are deemed highly relevant to accession and are also seen as such by Governments. Furthermore, the goal of convergence towards the relevant acquis chapters (i.e.: 5, 16 and 32) is regularly mentioned in EU documents. Similarly, counterparts in neighbourhood countries have emphasised that convergence towards EU norms would help strengthen their socio-economic outcomes.

During the 2000s and early 2010s EU support to PAR strategies and action-plans formulated by beneficiaries were mainly focused on PFM and CSR. The approach has very recently become broader, in line with the six core areas – even if based on interviews it seems that not all stakeholders have yet fully internalised the new approach. Some stakeholders have stated that delays in implementing the action plans may cause some misalignment with Governments’ updated objectives. Also, in some cases the chain of logic embedded in EU support and their links in documents to stated strategic objectives seems partial.

EU activities are generally aligned with national strategies. However, the ownership of these may be uneven and volatile during changes of Government. Also, the absence of a single national PAR strategy and effective coordination mechanisms has been a constraint in the past. This is being alleviated as various strategies are being consolidated into a single overarching one by most governments, which may in turn facilitate improved coordination.

**1.b. Relevance – Design**

EQ 4: Is there adequate consideration of national capacity?

EQ 5: What is the extent of stakeholder participation in design?

EQ 6: To what extent is there a correspondence between the outputs and results to the objectives and what is the quality of the intervention logic in terms of steps towards the ultimate objective?

EQ 7: Has there been good integration of past and ongoing lessons learnt under IPA/ENPI assistance, and from EU and other donors’ assistance in other regions?

There appears to be adequate consideration of national capacity at both strategic and operational level. This is discussed in general terms in strategic documents and policy dialogue is seen as an effective way to strengthen this area. To alleviate capacity constraints measures are built into operations’ design. For instance, TA is built-into programmes, projects and budget support.\(^\text{10}\)

A potential weakness noted by some stakeholders is that the sequencing of capacity building activities can result in misalignment. For example, TA is sometimes secured only after a certain policy action should have been completed to meet a requirement of EU for disbursement of budget support.\(^\text{11}\) In other cases, encountered quite frequently, delays in mobilising the TA have led to some of the actions identified as part of a planned TA being financed ad-hoc by Government.

EU planning, programming and operational documents indicate that stakeholders are consulted, and informed of strategies and operations design. Furthermore, these consultations appear quite broad, including the Government, the civil society and donors. By and large, stakeholders interviewed consider that their feedback has been given adequate consideration.

The experience is varied but there are a number of instances where the chain of logic is either unclear or weak. For instance, some ENI and IPA programming documents failed to include any significant results attributable to PAR even if this area is cited as a priority in the text. At

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\(^{10}\) Extended to only few of the beneficiaries covered in this evaluation.

\(^{11}\) [https://ec.europa.eu/europeaid/budget-support-0_en](https://ec.europa.eu/europeaid/budget-support-0_en)
the operational level, the logical or results frameworks are at times left out of documents or not well defined – this issue also relates to Monitoring and Evaluation (M&E) taken-up below.

SIGMA support appears to be an example where support is built on previous lessons. Also some ENI and IPA programming documents advise that future support take account of lessons learnt. Otherwise, integration of lessons learnt by the EU seems uneven, especially at the level of operations. This is in part because at times there seems to be inadequate or partial follow-up to evaluations and Results Oriented Monitoring (ROM) reports. Furthermore, there are only few examples cited of cross-learning (from one beneficiary to another) for instance on successful approaches that could be adapted to another context. Similarly, there is limited evidence that lessons learnt by other donors with similar experience in the country or comparable circumstances are considered.

2. Effectiveness

EQ 8: Have the objectives been met? What factors have hindered or supported achievement?

EQ 9: What results have been achieved by budget support operations and what were the determining factors?

The evidence reviewed so far pertains more to completed activities typically approved during the earlier period of this evaluation. Most intended outputs are generally achieved, for instance such as laws and regulations prepared, adopted and promulgated. However, there is limited evidence, yet, of institutional outcomes being achieved in areas such as civil service restructuring, and effective first steps towards de-politicisation – even though recent experience is more encouraging. A problem encountered by the evaluators concerns the lack of information on attainment of the ultimate objectives, outcomes and impact. A further hindering factor is that at times the log-frame and its related indicators are weak and do not provide a good measure of impact and outcome.

In the case of budget support, there is very limited experience under IPA, where the design of policy actions benefits from being aligned with SIGMA principles. There is more experience with budget support under ENI. In general, disbursement triggers (or indicators) are attained, some late. Many interviewees felt that this instrument helps prioritize and accelerate certain reforms that would have been otherwise difficult to implement. There is less clarity on the achievement of specific and overall objectives, in part due to shortcomings in the Logframe. Nevertheless, in the case of ENI, it appears that in the past PFM results have mostly been attained while civil service reform often seems to fall short of expectations – there was limited support to other PAR principles during much of the evaluation period. Facilitating factors to attaining results, based on analysis so far, include upstream analytical work (e.g.; PEFA assessments in the past and SIGMA studies more recently), effective policy dialogue, and good quality technical assistance. Hindering factors cited in reports or by stakeholders include optimistic assumptions concerning timing of approval of a critical law (such as the finance law) by Parliament, which in turn delays the whole programme, different understandings of how a specific prior action is to be fulfilled, or a delay in TA that causes a complex reform not to be prepared in time.

3. Coherence

EQ 10: Is there coherence between EU support to PAR and those supported by EU national and regional programmes, and considering other donors’ activities?

EQ 11: Does the EU assistance in targeting PAR promote effective cooperation and coordination between stakeholders?

The EU approach formulated for country specific and regional assistance is generally quite comprehensive and covers a full range of instruments and approaches. The various instruments, notably SIGMA for IPA II beneficiaries and some ENI beneficiaries are used effectively through appropriate up-front needs assessments, and technical assistance. There is synergy in the use of various instruments for instance in the case of budget support where depending on the needs TAIEX, SIGMA, or Twining provides short, medium or long-term support to the formulation and implementation of PAR reforms. While not an EU instrument, the Regional school of public administration (ReSPA 13, covering the Western Balkans), which benefits from EU funding, provides complementary capacity building support in form of training, study tours etc. According to counterparts interviewed to date, it also brings an additional less tangible benefit of providing country and political context to EU activities in the Western Balkans 14.

No internal contradictions between overall PAR objectives and priorities and activities undertaken under operations have been identified so far. For instance, even though some donors agree to pay salary top-ups to civil servants the EU does not engage in such practices that would undermine civil service and human resources management logic by creating distortions in the way public servants are remunerated. Similarly, the evaluators so far did not find any evidence of significant duplication of activities with other donors.

Being often the largest donor with conveying power, the EU typically proactively promotes effective cooperation between stakeholders. Recently (past 1-5 years) established PAR special groups are specific instruments supporting the approach. These groups are formal policy dialogue fora between the Commission and each IPA beneficiary and they are established within the framework of the Stabilisation and Association Agreement 15 with each country. However, usually the main donors in PAR area are invited as observers. Interviews with World Bank staff, Member States, and some other donors, also confirmed that there was effective collaboration on PAR issues. Notwithstanding the overall positive feedback, in one instance a donor expressed concern over some asymmetry in the relationship whereby while the EU’s strength was ensuring that other donors’ approach were coherent with its ENI strategy, the reverse was not always true.

4. Efficiency

EQ 12: Were the national/multi-beneficiary/regional projects, SIGMA, TAIEX, twinning, stand-alone/integrated projects available and used in the best and most cost-effective and coherent way?

EQ 13: Were the outputs and effects achieved at a reasonable cost? Why was this possible? Could the same results have been achieved with less funding?

Generally, various types of EU support were available to the countries (SIGMA’s support to neighbourhood countries being subject to a greater resource constraint) and delivered in a coherent way. Interviews with stakeholders so far revealed that they were quite knowledgeable of these various facilities and called upon them in appropriate ways – for instance considering the nature of the required support and its duration. A benefit also cited

13 http://www.respaweb.eu/
14 An equivalent institution has not been set up for ENI beneficiaries.
concerned the importance of continued working relationship with an entity they had already worked with. Exchanges with the representatives of national authorities so far revealed that most felt that different aid modalities have a positive influence in the evolution of frameworks for policy dialogue and coordinated TA/capacity development initiatives. However, not all agreed on the appropriate mix of instruments. For instance, representatives of most countries explained that budget support was their preferred form of support offered by the EU. In contrast, one felt that budget support entailed implicit conditionality that would undermine country ownership and preferred large TA projects. Finally some stakeholders expressed the view that a realistic timetable needed to be set for completion of policy actions.

Based on documents and interviews conducted the majority of Twinning and TAIEX experts seemed to have been knowledgeable and effective in fulfilling their terms of reference, and transferring knowledge to local counterparts. The latter aspect was seen as being done less effectively by private consultants who would tend to adopt a narrow view of their terms of reference. In terms of cost effectiveness, some officials explained that the cost of private consultants was often higher than that offered by TAIEX or Twinning. However, most government stakeholders interviewed felt that complex EU procedures and delays due to various causes including EU staff being over-extended, even for relatively small procurements imposed additional costs on both EU staff and beneficiaries that were seemingly not commensurate with further benefits.

5. Impact

EQ14: Are the outputs and immediate results delivered by IPA I/ENPI translated into the desired/expected impacts; namely in terms of achieving the strategic PAR related objectives/priorities, and in the case of Enlargement countries linked to accession preparation?

The ultimate impact of EU support to PAR will typically not be visible for many years – for example in the case of IPA II beneficiaries by meeting the requirements of the relevant three chapters of the acquis. The evaluation distinguishes between impact achieved at the EU strategic level, with progress typically reported annually, and at project level – for some of which there may be periodic Results Oriented Monitoring.

Progress at strategic level is typically documented annually in annual project or progress reports, which while not independent evaluations per-se tend to be quite candid and are generally discussed and agreed with the authorities. The overall trend visible for both neighbourhood countries and IPA II beneficiaries seems to be one of steady progress in certain areas while much slower for others – which reappear as pending issues year after year. The most successful programmes or more specific PAR areas appear to be those where there is strong political commitment and ownership by technical staff of ministries concerned. For IPA II beneficiaries, SIGMA baseline and subsequent assessments have provided a very detailed and useful roadmap for implementation of each area of reform, which together with improved and structured dialogue is expected to help accelerate PAR.

Impact at the level of operations is harder to assess, in part due to incomplete information and considering that activities initiated in the last few years are still ongoing. An observation that can be made at this juncture is that EU financial support is increasingly in the form of budget support, complemented by TA. Governments and EU seem to share the expectation that this approach will also contribute to accelerating the reforms and attaining greater impact by focusing on results.

6. Sustainability
EQ 15: What are the risk factors to the sustainability of identified impact and were they mitigated?
EQ 16: Is there ownership by the assistance beneficiaries, especially amongst those with strategic/policy and management responsibility?
EQ 17: Are people trained still typically employed by government in functions they use their skills?
EQ 18: What is the contribution of EU assistance to de-politicisation of the civil service?

PAR is a continuous long-term process to increase the efficacy of the public administration and in the case of IPA beneficiaries to meet the EU membership requirements. During this period changes in Government have and are likely to continue to occur. By and large, in the past changes in government have often resulted in a temporary slow-down of reforms, but generally with limited policy reversals and the programmes generally go back on track. Accession to the EU is proving to be a strong motivating factor even if some national officials expressed “reform fatigue” and expressed concerns over possible additional delays. Nevertheless, ownership and commitment of those officials remained strong. However, in some cases other risks are present – for instance where the civil service is being overhauled in parallel with major constitutional changes affecting certain foundations of Government.

Another consideration is that EU support initiated in the last few years is still ongoing and its sustainability cannot yet be assessed. The fact that, except for a handful of countries that have experienced political or social turmoil, such support has continued over many years and continues to be requested by Governments, enhances sustainability. Also policy actions may have been initiated but not yet completed – tracking these has been difficult in the past but should become more feasible for countries that have annual SIGMA assessments and reviews. Nevertheless, for the majority of countries there is now greater stability in the Government’s PAR strategic framework, which contributes to sustainability.

The issue of retention of trained staff, which affects sustainability, varies from one country to the next and between Ministries within a country. Many of the high level counterparts interviewed so far had been involved in PAR for a long time and provided evidence of sustainability. Furthermore, certain ministries involved in PAR appear to be able to keep their staff better (e.g.; Ministries of Finance) than others (in some cases turnover was an issue within the ministry responsible for PAR). Overall, the risk of high turnover undermining PAR appears to have been largely mitigated in many countries.

7. Value Added

EQ 19: Is there enhanced visibility of EU support and better appreciation of various aid modalities?
EQ 20: What is the additional EU value resulting from the interventions in the area of PAR, compared to what could be achieved by the beneficiary countries at national and/or regional levels, or with the support of other donors?
EQ 21: How does EU PAR support contribute to more effective policy dialogue?

All operations reviewed up to now included a visibility component in their implementation. The visibility of EU actions in IPA II beneficiaries appears generally greater than in ENI beneficiaries and this has generally contributed to an appreciation and understanding of EU support. Interviews show that most government stakeholders are quite familiar with the EU approach towards PAR and have a clear understanding of instruments used, which they see as generally appropriate. Similarly, civil society organisations that are directly following this area are familiarised with the EU approach towards PAR. However, the extent to which larger pool of civil society is aware and/or familiarised with the approach PAR is harder to
establish and is for individuals probably limited to specific aspects of PAR that are of highest interest to them. It should be noted that some stakeholders questioned the horizontal approach towards PAR, arguing that it should also encompass vertical or sectoral PAR and ultimately the delivery of government services to the population.

In most, if not all of the countries covered, the EU has been the largest financing source for PAR, as well as the most important donor from a political standpoint (with USAID and World Bank being similarly important in a few neighbourhood countries). The EU has, to a certain extent, used its convening power to crowd-in support of other donors. Interviews clearly indicate that for the large majority of countries in the absence of EU support PAR would be delayed for reasons including (i) absence of dialogue currently in place that helps ensure this area receives high priority from Government and (ii) lack of funding for critically needed TA, and (iii) in some cases budget support that helps fill the fiscal gap. Experience (e.g.; in the cases where EU TA is delayed) shows that without EU support some high priority activities may be undertaken by Government. However, these tend to be ad-hoc or partial as many complementary needs would remain unfulfilled.

Political dialogue provides the backbone of the EU accession process as well as association agreements for neighbourhood countries. The establishment of the Special group on PAR has established a better structure to this dialogue. It has highlighted important areas in which results have not been achieved, or are only being achieved slowly, and has paved the way for the discussion and adoption of solutions.

8. Cross-cutting issues: gender

EQ 22: Is there adequate focus on gender in operations?
EQ 23: To what extent did the EU support lead to the consolidation of gender equality as a pillar and recurrent priority of PAR?

With regards to the narrow issue of access of women to civil service positions, many of the countries covered by the evaluation had communist governments during many decades of the 20th century and relative gender equality at most levels of Government in terms of numbers remains a legacy of that system. The situation differs for southern ENI beneficiaries and Turkey.

The operations reviewed as part of this evaluation mention gender and express the ambition to have a focus on this cross-cutting theme, but very few have it in practice. This may be because this was not perceived to be an issue where a seemingly strong gender balance already existed within the civil service or that gender issues were being addressed elsewhere such as in gender action plans. Nevertheless, at a practical level there was rarely monitoring in place to see whether women had adequate access to and participated in EU-funded training. At the strategic level, the EU frequently emphasises gender budgeting as part of its dialogue. However, actual results appear to have been quite limited and no substantial evidence has been found yet to show that specific assistance has been provided to develop the gender pillar within PAR.

9. Monitoring and Evaluation

EQ 24: Was M&E well designed, implemented and utilised to steer operations and monitor results?

M&E of the projects funded by EU follows generally established procedures for monitoring and evaluation of EU interventions. Review of project documentation reveals varying degree of SMARTness (Specific, Measurable, Attainable, Realistic and Timely) of indicators developed for measuring progress of projects. Many projects opt for quantitative indicators,
mainly at output level. Projects follow reporting and monitoring guidelines; however project reports are in most cases predominantly reporting on activities/outputs while reflection on outcomes or impacts of projects is missing.

EU staff are tasked with regular monitoring of projects and are also involved in sector dialogue. In addition, EU commissions ROM reports\textsuperscript{16} as main means of external formal monitoring of interventions, while project evaluations take place only in limited number of cases. EU also commissions strategic or thematic evaluations of assistance. Furthermore, a good M&E, especially in an area such as public administration, cannot simply be based on prior indicators and need to be complemented by assessments such as surveys, tracer studies to track people who have received training etc. In the past, such activities seem neither to have been planned nor implemented. However, the situation has and should improve following the recent introduction of SIGMA surveys, as well as other planned initiatives such as partnership with the regional cooperation council in the Western Balkans to include questions on PAR in their annual surveys.

\textbf{III. Main Preliminary Conclusions}

What follows represents preliminary conclusions based on ongoing work. They will be enhanced and adjusted as the evaluation is completed. Final conclusions will be presented in the final evaluation report scheduled to be issued during the first quarter of 2018.

1. **Relevance of Objectives:** Convergence towards EU norms is generally given appropriate importance at both programme and project levels. EU strategies and action plans are generally well aligned internally and with Government strategies. This area is a strong point of EU support to PAR.

2. **Relevance of Design:** For both strategies and operations, some elements of design such as consideration of national capacity appear to be consistently strong, as is consultation of stakeholders. However, there is room to improve the chain of logic, and better take into account lessons learnt at the operational level.

3. **Effectiveness:** Strategic and operations’ objectives generally tend to be at least partially met as intermediate outcomes are delivered. For operations, budget support tends to generally help accelerate reforms and the specificity of how prior actions are met may also improve their quality. Realistic expectations being set up-front on the timing and scope of reforms and timely availability of TA where needed are seen as keys to a successful operation.

4. **Coherence:** EU activities in the area of PAR benefit from good internal and external coherence. There is also generally a sound division of labour between the EU and other donors.

5. **Efficiency:** EU support is appropriately delivered through a wide range of facilities and projects. In monetary terms, cost effectiveness cannot be fully assessed. Nevertheless, comparison with other service providers suggests that TA delivered by TAIEX, SIGMA or Twining is quite cost effective. The most significant source of inefficiency seems to be related to delays in mobilizing and approving the necessary financial assistance, at which time priorities may have evolved.

6. **Impact:** EU support has had a positive and quantifiable impact at strategic level even if progress has often been uneven and slower than expected. Impact at the level of operations is harder to assess but the move towards increased budget support, while

\textsuperscript{16} \url{https://ec.europa.eu/europeaid/external-independent-review-system_en}
recent, should help give greater visibility to the reforms and accelerate their implementation.

7. Sustainability: PAR is subject to uneven implementation and temporary slow-down and faces various risks that are at times substantial. Nevertheless, many reforms achieved so far appear to have been sustained even if their implementation is work in progress, turnover of staff has been limited in some ministries or mitigated elsewhere, and generally significant reversal has not occurred.

8. Value Added: EU value-added is through its policy dialogue as well as financial support. The former now benefits from being better structured, especially in IPA II beneficiaries thanks to PAR special groups.

9. Cross-cutting: Gender equality within the civil service does not appear to be an issue in terms of numbers for former communist countries, but the issue seems to be present for others. Insufficient attention is paid to ensuring and monitoring whether women amongst targeted beneficiaries have adequate access to training under PAR operations.

10. M&E: M&E has been a weakness in the past at both strategic and operational level. New approaches introduced since 2014 should improve the situation, especially as some key data will be more readily available.