

NATIONAL INTEGRITY SYSTEM
ASSESSMENT
KYRGYZ REPUBLIC

EXECUTIVE

According to the Constitution,¹ executive functions in the Kyrgyz Republic are exercised by the Government, by its subordinate Ministries, State Committees, Administrative Departments and local public administrations. The Government is the highest executive body of the Kyrgyz Republic and is headed by the Prime Minister. The Government consists of the Prime Minister, Vice Prime Ministers, Ministers and Chairpersons of State Committees.

Structure of the Government includes 12 Ministries and 4 State Committees.

Since 1991, the structure of the Kyrgyz Government has changed more than 10 times. Furthermore, the head of the Cabinet has been changed 30 times. On average, a change of Prime Minister took place in the Kyrgyz Republic once in 11 months. If we talk about structures, they can be static only in the event that the Government is stable, and nothing fluctuates.²

Executive branch is not the strongest branch in Kyrgyzstan, even after amendments to the Constitution, where the key message of the changes was the strengthening of functions of the Prime Minister. According to the expert who participated in various studies of the public sector, there is 'uncertainty, confusion, redundancy in the functions of Ministries, State Committees, Services, Agencies, Inspectorates, Foundations and local authorities, which leads to a violation of competence, duplication of powers and creates problems in public administration. Lack of separation of regulatory, control and political functions creates the organizational basis for ineffective governance and performance of public authorities, and emergence of corruption'.³ Kyrgyzstan has extensive integrity rules for executive officials, but lacks the development and functioning of mechanisms for their implementation.

Overall Pillar Score: 51/100

DIMENSION	INDICATORS	LAW	PRACTICE
Capacity 50/100	Resources		50
	Independence	75	25
Governance 54/100	Transparency	75	50
	Accountability	75	50
	Integrity mechanisms	50	25
Role 50/100	Executive Oversight	50	
	Legal reforms	50	
Law and practice average		63	43

RESOURCES (PRACTICE) - 50

To what extent does the executive have adequate resources to effectively carry out its duties?

National Sustainable Development Strategy, developed for the period 2013-2017,⁴ noted that 'human resources capacity of public administration and local governments remains low. Professionalism, competence and moral values of a certain part of civil and municipal servants do not live up to the requirements. In turn, the need was pointed out 'to improve the capacity of the

¹ Constitution of the Kyrgyz Republic dated June 27, 2010, (Section V, Art. 83)

² https://kaktus.media/doc/391846_kak_izmenenie_stryktyry_pravitelstva_vliialo_na_strany_s_1991_goda.html

³ <http://www.center.kg/article/33>, Story by N. Sadykov, Head of the Analytical Center 'Institute for Constitutional Policy'

⁴ KR National Sustainable Development Strategy for 2013-2017, passed by the Decree of the KR President dated January 21, 2013 No. 11, Chapter 2.6.

personnel, create a unified database and a system for stimulating professional growth of personnel of the national and municipal governments, as well as for regulating the mechanism of rotation of managerial personnel at the legislative level in order to exclude manifestations of corruption and tribalism’.

To date, the problem of professional personnel in the executive is topical. According to the officials,⁵ there is a high staff turnover, often due to the low wages, which is Som12,000-14,000 a month on average, and due to the lack of proper working environment. As a result of frequent turnover, the Government does not keep the institutional memory and, in general, the prestige of the civil service is not at a high level.

With regards to technical resources, the provision in central apparatus of the executive is relatively sufficient, which cannot be said about the territorial units, where there is a shortage of some up-to-date equipment required for their activities.⁶

Over the past few years, the amount of financing of the Kyrgyz executive has slightly increased. For example, the 2019 budget of the Office of the Government compared to 2014 has grown by Som26,527.14; the budget of the Ministry of Justice has grown by Som82,423.94; special funds increased by Som2,782.48; the budget of the Ministry of Health Care with special funds included, has grown by Som2,236,318.94; the Ministry of Education noted an increase in the budget by Som12,866,312.8, including special funds.

TITLE OF THE PUBLIC BODY	2014 BUDGET(THOUSAND SOMS)		2019 BUDGET7 (THOUSAND SOMS)	
	BUDGET RESOURCES	SPECIAL FUNDS	BUDGET RESOURCES	SPECIAL FUNDS
Office of the Government	210,203.56		236,730.7	
Ministry of Justice	108,540.36	39,717.52	190,964.3	42,500.0
Ministry of Health Care	2,366, 299.76	704,564.37	4,602,618.7	1,207,800.0
Ministry of Education	13,945,680.11	2,256,638.85	26,811,992.9	4,375,759.6

INDEPENDENCE (LAW) - 75

To what extent is the executive independent by law?

According to the Constitution of the Kyrgyz Republic,⁸ the Government of Kyrgyzstan is accountable to the Parliament and is liable to it to the extent provided by the fundamental law of the country. The Parliament, on the initiative of one third of the total number of the Members of the Parliament, may consider expressing *No Confidence* in the Government. After expressing *No Confidence* in the Government, the President is entitled to decide on the resignation of the Government or to disagree with the decision of the Parliament. In the event that the Parliament, within 3 x months, has confirmed its decision of *No Confidence* in the Government, the President shall dismiss the Government.

⁵ Interviews with officials of various Ministries and KR Government Office

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⁷ KR Law ‘On the 2019 national budget of the Kyrgyz Republic, and forecast for 2020-2021’, dated December 26, 2018 No.112

⁸ Constitution of the Kyrgyz Republic dated June 27, 2010 (Art. 85 p. 1-3, 6, 7)

Faction with more than one half of the parliamentary mandates, or a coalition of factions with its participation, shall nominate a candidate for the post of Prime Minister within 2-5 business days from the day of the first meeting of the Parliament of the new convocation, which introduces the program, structure and composition of the Government to the Parliament. President shall issue a Decree on the appointment of the Prime Minister and other members of the Government within three days.⁹

In the event that the Coalition of Factions loses the status of a parliamentary majority, this entails the resignation of the Government and appointment of the new members.¹⁰

Prime Minister may raise before Parliament the issue of confidence in the Government, but not more than twice a year. In the event that the Parliament refuses to trust the Government, the President, within 5 working days, shall make a decision on the resignation of the Government or call for early Parliamentary Election.¹¹

INDEPENDENCE (PRACTICE) - 25

To what extent is the executive independent in practice?

In Kyrgyzstan, over 26 years of political independence, 30 Prime Ministers have been replaced. The 31st Prime Minister M. Abylgaziev held the post from April 20, 2018 - until June 2020. Over the past few years, the resignations of Prime Ministers have been occurring most frequently. After the 2010 Revolution, the country switched to a Parliamentary form of ruling. There were times when the Prime Minister, in the best case, kept the job for one year, while there was even shorter period in office.

Unfortunately, 'the government of Kyrgyzstan is not sustainable. Regular resignations, an endless string of Prime Ministers, change of names of Ministries and Departments are the hallmarks of the Kyrgyz Cabinet. Frequent changes of senior officials in the Cabinet undermine the continuity of programs and reduce public confidence in the Government'.¹² For example, in the past five years, the heads of the Ministry of Economy have been changed five times. The speed of replacement of Ministers of Justice and Ministers of Transport and Roads was almost similar.¹³

From the point of view of the Honored Lawyer M. Ukushov,¹⁴ according to the Constitution,¹⁵ the key role in the formation of both the Government and the executive is given to the Prime Minister due to which it can be assumed 'that he 'unilaterally' appoints the heads of the Ministries, Departments, heads of local public administrations, etc., which creates the illusion that the functions and powers of the head of state have been reduced'. In fact, analysis of the powers of the President provided by the fundamental law, shows, that 'none of the powers of the head of state have been transferred to the Prime Minister or to the Jogorku Kenesh'. In the event that the Parliamentary Majority is headed by a Faction of the political party of the President, then the maximum possible political power under the Constitution is concentrated in the hands of the head of state, therefore, the Parliament, the Prime Minister and the Government 'lose' their 'strength' and independence. In the event that the head of state does not have the 'own' influential parliamentary faction, or in the event that his party does not have seats in the Parliament, he 'loses' his power. In this case, the Prime Minister, who has his 'own' influential parliamentary party in the Parliament will dominate in public administration'.¹⁶

⁹ Constitution of the Kyrgyz Republic dated June 27, 2010(Art. 84 p. 1, 5)

¹⁰ Constitution of the Kyrgyz Republic dated June 27, 2010(Art. 84 p. 7)

¹¹ Constitution of the Kyrgyz Republic dated June 27, 2010(Art. 86 p. 1)

¹² <https://kloop.kg/blog/2019/05/30/hotite-rabotat-v-pravitelstve-stanovites-ministrom-chrezvychajnyh-situatsij-vosem-neizvestnyh-faktov-o-smenah-kabmina-kyrgyzstana/>

¹³ <https://ru.sputnik.kg/infographics/20200217/1047094739/kyrgyzstan-ministerstvo-perestanovka-rukovodstvo-vlast.html>

¹⁴ <http://center.kg/article/146> - M.Ukushov, Honored Lawyer of the Kyrgyz Republic

¹⁵ Constitution of the Kyrgyz Republic dated June 27, 2010(Art. 84 p. 1-4)

¹⁶ <http://center.kg/article/146> -M.Ukushov, Honored Lawyer of the Kyrgyz Republic

To what extent are there regulations in place to ensure transparency in relevant activities of the executive?

Legislative legal mechanisms to ensure transparency of the government budget, of the assets of executive officials, and government meetings are quite adequate.

Law¹⁷ requires the provision of official information through its publication on the website of a government agency or local government or on some other websites. Additionally, other ways of accessing official information may be provided. The following shall be published subject to proper procedure and timing of publication: regulatory legal acts; information on current decisions and official events of public authorities and local governments; informational clarifications on adopted socially significant decisions, including legal acts, imposing new responsibilities on citizens and legal entities, establishing or enhancing responsibility; annual performance reports of public authorities and local governments; annual reports of public authorities and local governments on the results of monitoring and evaluation of the effectiveness and efficiency of the legal acts, as well as reports on the implementation of governmental programs; texts of judicial acts issued in the established form on the merits of the case; and other information materials.

According to the Constitutional Law 'On the Government of the Kyrgyz Republic',¹⁸ the Government shall inform the citizens through mass media about the issues to be discussed at their meetings and about the decisions made by them. Video and audio recording of open meetings of the Government should be published in full, without any reduction, on the official website of the Government or on the public video portals with the mandatory references to the official website of the Government within 2 working days after the meeting. If it is not possible to publish video or audio recordings of the Government meeting on time, the Office of the Government shall provide information on the period during which the recording will be published. Records of closed meetings shall be kept by the Government in observance of the secrecy mode. President has the right to attend meetings of the Government.

In accordance with the Law 'On regulatory legal acts of the Kyrgyz Republic',¹⁹ the Government is a rule-making body vested with the right to adopt and issue normative legal acts in the form of Decrees on the basis of and in fulfillment of normative legal acts having higher legal force. According to the hierarchy of regulatory legal acts, Decrees of the Government rank seventh. In order to ensure the legality of the Decrees of the Government, in addition to their mandatory registration with the Office of the Government, the established order of their acceptance should be observed. The Decrees should be officially published and, within 7 working days from the date of publication, should be entered in the State Register of Regulatory Legal Acts, which is maintained by the Ministry of Justice, and then distribute for free via Internet.

Executive officials shall submit, in the manner prescribed by the Law on Declaration of Income, Expenses, Obligations and Property of Persons Acting As or Holding Governmental and Municipal Positions',²⁰ the declarations containing information about incomes, expenses, property and liabilities owned by them and their close relatives. Starting from 2018, the Declarations shall be submitted to the State Tax Service (STS).²¹

In turn, the Code of Conduct for civil and municipal servants²² provides that civil and municipal servants are required to submit Declarations in the manner prescribed by law. In the event that

¹⁷ KR Law 'On access to information held by public authorities and local authorities of the Kyrgyz Republic', dated December 28, 2006 N 213 (Art. 16)

¹⁸ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85 (Art. 14 p. 8, 8-1, Art. 30 p. 1)

¹⁹ KR Law 'On regulatory legal acts of the Kyrgyz Republic', dated July 20, 2009N 241 (Art. 4 p. 1, 5-7, 27-28), KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012N 85 (Art. 17)

²⁰ KR Law 'On the declaration of incomes, expenses, liabilities and property of persons acting as or holding civil and municipal posts', dated August 2, 2017, N 164 (Art. 1, 3, 4 p. 1)

²¹ KR Law 'On the declaration of incomes, expenses, liabilities and property of persons acting or holding civil and municipal posts', dated August N 164 (Art. 6 p. 1 p. 3)

²² Code of Conduct for Civil and Municipal Servants of the Kyrgyz Republic, dated August 19, 2016 N 43 (Art. 9)

serious discrepancies in the information in the Declaration with the actual material situation of the officials have been revealed, sanctions shall be applied to them in accordance with the law.

According to the Budget Code,²³ the authorized public authority shall be obliged to post budget documents on its official website within 15 days after they were passed (approval) in the prescribed manner, provided that the accessibility shall be ensured in accordance with the Law 'On access to information held by public authorities and local governments of the Kyrgyz Republic'.²⁴ The following is the subject to publication: key areas of fiscal policy; draft national budget; civil budget; National Budget Law; semi-annual review of the implementation of the national budget; Report of the Chamber of Accounts on the audit of the execution of the national budget; approved annual report on the implementation of the national budget; monthly budget execution reports. Information on the current state of the Public Debt of the Kyrgyz Republic is open and shall be posted on the official website of the authorized public body. Budget execution reports approved in the established manner are subject to publication within a month after their approval.

At the end of each year, the national budget for the next year is to be approved, regulated by a special law. Thus, in December 2018, the Law 'On the national budget of the Kyrgyz Republic for 2019 and the forecast for 2020-2021' was adopted²⁵.

TRANSPARENCY (PRACTICE) - 50

To what extent is there transparency in relevant activities of the executive in practice?

The year 2019 in Kyrgyzstan has been called the Year of Regional Development and Digitalization.²⁶ In our view, the Kaktus.media conducted an interesting study on effectiveness of the performance of the Government on digitalization, and whether the Government has really become more open or not. Kaktus.media studied the official websites of ministries and departments, plenipotentiary representative of the Government in the Oblasts, as well as of the other public agencies (43 entities in total), in order to understand how well they provide information about their activities and services. It turned out that websites are not available in the six regions (Chui, Jalal-Abad, Talas, Osh, Batken and Issyk-Kul Oblasts). Out of all 37 websites reviewed, only 18 websites tend to update the content on a regular basis. Analysis of the visits to the governmental websites shows that they are not popular among the population. Many Kyrgyz websites are not adapted for mobile devices at all. The Kaktus.media editors failed to find any data on how much public funds are spent directly for the websites. However, over the two years (2017-2018), Som91.23 million of the public budget funds were spent on information technology. Thus, the vast majority of government websites are not in demand and 'the majority of the websites of government agencies, which, in theory, should be an effective tool for information dissemination and communication with the public, does not perform their functions'.²⁷

According to journalists²⁸ who directly cover the work of the Government, the procedures and regulations of the Government and practically not translated into simplified language and are difficult to be understood by ordinary people. Official documents are large in volume, contain many obscure, 'officialese' wordings. If we talk about amounts of government loans, about draft budget of the country and other numbers posted on the websites of ministries and departments in the form of tables, then even the personnel of the ministries have admitted that these numbers were difficult to understand. Data on public debt is published with 2 months of delay, linking this with the

²³ KR Budget Code, dated May 16, 2016, N 59 (Art. 125 p. 1, 5, 6)

²⁴ Law on Access to Information Held by National and Local Governments of the Kyrgyz Republic, dated December 28, 2006, N 213

²⁵ KR Law 'On the National Budget of the Kyrgyz Republic for 2019 and Forecast for 2020-2021', dated December 26, 2018 No. 112

²⁶ Decree of the KR President 'On declaring 2019 the Year of the Development of Regions and Digitalization of the Country', dated January 11, 2019 UP No. 1

²⁷

https://kaktus.media/doc/401809_cifrovizaciia_kyrgyzstana_ojidanie_i_realnost_sayty_kotorye_nikomy_ne_nyiny.html

²⁸ Interviews with journalists

peculiarities of the calculation, where the numbers are given without comparing the dynamics in the direction of increasing or decreasing the public debt, which is uninformative for ordinary citizens.

The budget of the Government is published on the 'Open Budget' portal,²⁹ which is an automated system for providing online data on revenues and expenses of the national and local budgets. The data presented is broken down by ministries and departments, by territorial divisions and by individual recipients. OECD Report³⁰ notes that the portal is automatically updated online, by means of extracting the data from the information system to the Central Treasury of the KR Ministry of Finance. The website of the Ministry of Finance contains detailed information on the national budget, including information on the budget of the Government.³¹ However, the media pointed out numerous gaps in the 'Open Budget' portal, such as outdated information, deletion of open data on budget execution, and difficult search for aggregated data on the website of the Ministry of Finance.³² Kyrgyz Ministry of Finance commented that the 'Open Budget' portal is integrated with the Treasury system, and therefore the portal's data are not updated, while in mid-August 2019, due to server overloads, the official website of the Ministry of Finance temporarily ceased to function fully. Ministry of Finance assured that the key budget documents have been fully restored.³³ However, having studied these websites, we can say that at present, the 'Open Budget' website has not changed the infographics for the KR Debt, it dates back to June 2018. Several departments were randomly checked on the expenses incurred and the revenues obtained in 2019, but there is no published information, and an error is generated by the system. Clarification of the information on expenses or revenues directly on the website of the Central Treasury of the KR Ministry of Finance³⁴ is impossible due to the fact that when connecting to the website it gives an error. Furthermore, in the framework of our project, the TI Kyrgyzstan, when using the 'Open Budget' portal and the website of the Ministry of Finance repeatedly, saw the multiple changes in the budgets of various sectors, and therefore, we repeatedly rewrote the budget figures in our Survey, which created confusion and uncertainty.

According to the results of the assessment of the International Budget Partnership (IBP), the Open Budget Index of the Kyrgyz Republic in 2017 amounted to 55 points out of 100, which 'means that the government system does not yet provide enough budget information to citizens and provides public with limited information about the budget. Information on expenses and 'the country's revenues are not yet detailed enough for citizens to consciously participate in the budget process'.³⁵ Nevertheless, since 2008, the dynamics of growth of the budget transparency index has been traced, from 8 points in 2008 to 55 points in 2017. With this indicator, the country was ranked 38th out of 115 countries.³⁶

According to interviews with Government officials, budget hearings are held annually, the civil sector is invited. Furthermore, there is an Inter-Ministerial Committee for incentive grants to local authorities with participation of the representatives of civil society to ensure avoidance of corruption risks. However, in their opinion, there are complaints on the performance at the regional level. Nevertheless, according to the Open Budget Index, the indicator 'Public Participation' was given 31 points out of 100, which indicates that the public has little chance of participating in the budget

²⁹ <https://budget.okmot.kg/ru/>

³⁰ OECD Report 'Anti-corruption Reforms in Kyrgyzstan', 4th Round of Monitoring of the Istanbul Plan of Anti-corruption Actions (p. 134)

³¹ <http://minfin.kg/ru/novosti/novosti/odobreny-osnovnye-napravleniya-fiskalnoy-politiki-.html>,
<http://minfin.kg/ru/novosti/novosti/2018-zhyldyn-byudzhedinin-dolbooru-ortocho-aylyk-a.html>,
<http://minfin.kg/ru/novosti/novosti/2018-zhylqa-respublikalyk-byudzheti-zhana-2019-202.html>,
<http://minfin.kg/ru/novosti/otchet-y-po-ispolneniyu-byudzheta/polugodovoy-obzor--ispolneniya-byudzheta.html>,
<http://minfin.kg/ru/novosti/novosti/v-minfine-kr-proshli-obschestvennye-slushaniya-po-.html>,
<http://minfin.kg/ru/novosti/godovoy-otchet-ob-ispolnenii-byudzheta.html>

³² <https://knews.kg/2019/09/05/pochemu-stremyatsya-udalit-otkrytye-dannye-po-byudzhetu-kyrgyzstana-v-god-tsfrovizatsii/>

³³ <https://knews.kg/2019/09/09/v-minfine-kyrgyzstana-otvetili-pochemu-ischezayut-dannye-s-portala-otkrytyj-byudzhet/>

³⁴ www.kazna.gov.kg

³⁵ <http://precedentinfo.kg/2018/01/31/obyavlen-indeks-byudzhetnoj-prozrachnosti/>

³⁶ <https://24.kg/ekonomika/74991/kyrgyzstan-uluchshil-dostup-kbyudjetnoj-informatsii/>

process. As regards the provision of opportunities for public participation by the executive, this indicator was 33 points.³⁷

Government meetings and other events are announced through various media, but the video and audio recordings of public meetings of the Government in full, without reduction, are not actually published. On the website of the Office of the Government there are short video clips of the Prime Minister's speech,³⁸ although information is published in the form of press releases, some of them are presented with a short video.³⁹ On this occasion, the officials⁴⁰ explained that the government website requires modernization and is not powerful enough to broadcast meetings in full, in connection, with which they post them on the 'YouTube'. It should be noted that the official website does not provide any links to 'YouTube', where they would be able to find the information about various Government meetings, but there are links to the social media 'Odnoklassniki', 'VKontakte', 'Twitter', 'Facebook', 'Telegram', and 'WhatsApp'.

Civil servants shall submit income declarations to the State Tax Service – (STS) - the Unified Tax Declaration (UTD). (See the section "Public Service" for more details).

ACCOUNTABILITY (LAW) - 75

To what extent are there provisions in place to ensure that members of the executive have to report and be answerable for their actions?

Basic rules governing the supervision of the executive branch are laid down in the Constitution⁴¹ and in the Constitutional Law 'On the Government of the Kyrgyz Republic'.⁴²

The Government is accountable to the Parliament and is liable to it to the extent of the stipulated by the Constitution and by the Constitutional Law.⁴³ Prime Minister administers the Government and is personally accountable for its performance to the Parliament.⁴⁴ Prime Minister annually, no later than 15th of May, shall submit a previous year Government Performance Report to the Parliament in the framework of the implementation of the Government program, including execution of the national budget.⁴⁵ The Government, the Ministries, State Committees and Administrative Departments to which the requests of the Members of Parliament are addressed shall provide the response within the time period established by law.⁴⁶

In turn, the Government has a permanent representative in the Parliament, who is personally responsible for ensuring the implementation of constitutional powers of the Government in the Parliament through regular interaction with it. Permanent representative is appointed and dismissed by the Prime Minister and exercises the authorities under his direct supervision.⁴⁷

In order to ensure interaction with civil society, the Government should carry out public discussions of the draft laws and other normative legal acts affecting the rights and freedoms of man and citizen, ensuring their publication on the official web portal of the Government, before forwarding them to the

³⁷ <https://www.internationalbudget.org/wp-content/uploads/kyrgyz-republic-open-budget-survey-2017-summary-russian.pdf>

³⁸ <https://www.gov.kg/ky/post/s/kyrgyz-okmtnn-apta-ichindegi-maanil-ish-charalary-video>, <https://www.gov.kg/ru/post/s/premer-ministr-too-ken-zhana-energetika-tarmaktary-zhergilikt-ekonomikanyn-sshnd-maanil-rol-oynoyt>, <http://www.gov.kg/?p=52922&lang=ru>, <http://www.gov.kg/?p=41299&lang=ru>

³⁹ <http://www.gov.kg/?cat=16&lang=ru>

⁴⁰ Interviews with officials of various departments and the KR Government Office

⁴¹ Constitution of the Kyrgyz Republic dated June 27, 2010, Section V

⁴² KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85

⁴³ Constitution of the Kyrgyz Republic dated June 27, 2010 (Art. 85 p. 1-3, Art. 89), KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N N 85 (Art. 12 p. 1)

⁴⁴ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85 (Art. 18 p. 2)

⁴⁵ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N N 85 (Art. 12 p. 2, Art. 32 p. 4)

⁴⁶ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85 (Art. 32 p. 6)

⁴⁷ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N N 85 (Art. 32 p. 2)

Parliament.⁴⁸ The Government is obliged to hold meetings with representatives of civil society and other stakeholders in order to discuss and develop recommendations aimed at ensuring the rights and freedoms of man and citizen, as well as to promote representatives of civil society that provide monitoring of the performance of the Government and its subordinate executive bodies on these issues.

According to the Law 'On regulatory legal acts of the Kyrgyz Republic',⁴⁹ in the event that the draft laws of the Government directly affect the interests of citizens and legal entities, and regulate business activities, these draft laws shall be a subject to public discussion by posting them on the official website⁵⁰ of the rule-making body, or by publishing them in the media. The Government is obliged, however, to disclose all information relevant to the subject of discussion. Time period for public discussion of draft regulatory legal acts shall be at least one month.

Budget Code⁵¹ also provides for public budget hearings for studying the public opinion, obtaining proposals, recommendations and making decisions in a view of the interests of people. Materials for the public budget hearings should be published on the official website 10 days before the public budget hearings. On the day of the hearing, the executive body shall ensure the registration of participants, media representatives (if necessary), taking minutes and preparation of final documents. Executive body shall summarize the proposals obtained from the participants of public budget hearings, and provide them with the response about the decisions taken as a result of the review of their proposals.

According to the 'Law on Civil Service and Municipal Service',⁵² civil servants shall bear disciplinary, administrative, material and criminal liability in cases of establishment or confirmation of a disciplinary offense, for which an official investigation shall be conducted.

In accordance with the 'Anti-corruption Law'⁵³ civil and municipal servants, including those holding political, special and senior administrative posts of civil and municipal service, are subjects of corruption offenses

Furthermore, in the Penal Code,⁵⁴ an entire Chapter with 13 criminals Articles is devoted to misconduct, including corruption.

According to the Budget Code,⁵⁵ the Government shall be exclusively liable for obligations arising from the imbalance of the certain budget. The heads of public bodies shall be responsible for ensuring compliance with the requirements of the KR budget legislation. Furthermore, officials of public bodies responsible for the timely flow of resources in the budget revenue and their spending, in the event of violations of financial discipline and non-performance of official duties shall be liable under the KR legislation. In the event that the facts of violation of financial discipline have been revealed, the Chamber of Accounts, as well as the authorized public body, shall submit proposals to the President, to the Parliament and to the Government on the dismissal of those public officials who committed the violations.

The Government has the right to submit proposals to the Chamber of Accounts on the need for audits in public and other bodies. Decisions of the Chamber of Accounts based on the results of audits shall be submitted to the Government.⁵⁶

Constitutional Chamber of the Supreme Court has the right to declare unconstitutional laws and other normative legal acts of executive authorities, in case of their contradiction to the Constitution.

⁴⁸ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85 (Art. 40 p. 2)

⁴⁹ KR Law 'On regulatory legal acts of the Kyrgyz Republic' dated July 20, 2009 N 241 (Art. 22, 23)

⁵⁰ Official website of the Government of the Kyrgyz Republic www.gov.kg

⁵¹ KR Budget Code, dated May 16, 2016, N 59 (Art. 127)

⁵² KR Law 'On Civil Service and Municipal Service', dated May 30, 2016 N 75 (Art. 33 p. 1, 3, 8, Art. 34-37)

⁵³ KR Anti-Corruption Law, dated August 8, 2012 N 153 (Art. 4)

⁵⁴ Penal Code of the Kyrgyz Republic dated February 2, 2017 (Chapter 44, Art. 319-331),

⁵⁵ KR Budget Code, dated May 16, 2016, N 59 (Art. 130 p. 1-3)

⁵⁶ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N N 85 (Art. 36)

Establishment by the Constitutional Chamber of the unconstitutionality of laws and other normative legal acts or their provisions obliges the relevant public bodies and officials to bring the issued by them legal acts in line with the Constitution and with the Acts of Constitutional Chamber.⁵⁷

In accordance with the Law,⁵⁸ the draft normative legal act, introduced by the Government to the subject shall be attached, among other documents, with the Certificate-Justification, which should contain the goals and objectives that are expected to be met or solved as a result of adoption of the certain normative legal act. Furthermore, the Government, as a rule-making body, shall, on a regular basis, carry out the monitoring⁵⁹ and evaluation of the adopted by it regulatory legal acts in order to identify the effectiveness and efficiency of its performance, for which independent experts and representatives of civil society shall be involved.

ACCOUNTABILITY (PRACTICE) - 50

To what extent is there effective oversight of executive activities in practice?

Executive in the person of Prime Minister shall annually provide a Government Performance Report to the Parliament, in accordance with the requirements of the Law.⁶⁰ Furthermore, almost weekly, the Members of the Government are called to Parliament for various meetings of Committees and Factions, which sometimes greatly interferes with their main work.

Audit of the executive is carried out by the Chamber of Accounts, which is an auditor of public and municipal enterprises, organizations of the Kyrgyz Republic and institutions, annually submitting to the Parliament the Performance Report on implementation of the national and local budgets⁶¹ as well as the Chamber Performance Report,⁶² as required by law.⁶³ Results of the audit activities of the Chamber of Accounts shall be posted on the official website.⁶⁴ However, the accuracy and the ultimate impact of the audits may be limited due to a shortage of skilled personnel in the Chamber of Accounts, and due to a lack of political independence (see. Chapter 'Chamber of Accounts' for more information).

With regard to regular audits of executive bodies, the Chamber of Accounts holds the audit in the following frequency: key ministries and agencies - once a year; local governments - once every two years. In relation to other public bodies, the audits are carried out according to annual and quarterly plans, approved at a meeting of the Board of the Chamber of Accounts, Resolutions of the law enforcement agencies, on the basis of letters of ministries and administrative departments, requests and complaints of citizens, taking into account the instructions of the President and of the Parliament, as well as the suggestions of the Chamber of Accounts Chair, of the auditors, heads of departments of the Headquarters and heads of territorial divisions.⁶⁵

According to journalists and civil society, there are almost no public hearings at the initiative of executive authorities, although the Government's official website has a section called 'Public Discussion of the Legal Acts', where people can familiarize themselves with the draft laws, Decrees and Orders of the Government and it is possible to make any proposals only by the indicated e-

⁵⁷ KR Constitutional Law 'On Constitutional Chamber of Supreme Court of the Kyrgyz Republic', dated 13 June 2011 N 37 N 37 (Art. 4, 51, 52 p. 2, Art. 53)

⁵⁸ KR Law 'On regulatory legal acts of the Kyrgyz Republic' dated July 20, 2009 N 241 (Art. 24-25, 31, 33-1)

⁵⁹ Decree of the KR Government dated March 23, 2015 N 139 'On approval of the Procedure for monitoring and evaluation of the effectiveness of regulatory legal acts of the KR Government' (p. 10-15)

⁶⁰ <http://www.gov.kg/?m=20180614&lang=ru>, <http://www.gov.kg/?p=115287&lang=ru>, <http://www.kenesh.kg/ru/news/show/2915/zhogorku-keesh-okmottun-2016-zhildagi-atkargan-ishi-zhonundo-otchetu-kanaattandirarlik-dep-tapti>

⁶¹ <http://esep.kg/images/docs/2018/01/otchet-rb-sa-2016.pdf>

⁶² Report of the Performance of the Chamber of Accounts, 2017,

http://esep.kg/index.php?option=com_content&view=category&layout=blog&id=29&Itemid=139&lang=ru

⁶³ KR Law 'On the Chamber of Accounts', dated August 13, 2004 N117 (Art. 3, 4, 31-39)

⁶⁴ http://esep.kg/index.php?option=com_content&view=category&layout=blog&id=26&Itemid=136&lang=ru

⁶⁵ E.Turgunbekova, Expert on public audit. General Guide 'On the Procedure for Auditing of the KR Chamber of Accounts and its territorial divisions', passed by the Resolution of the KR Chamber of Accounts Board, dated July

mails of the relevant government agencies. Decree and Orders of the Government tend to be posted rather late, and search for the required documents is very time consuming.

On the websites of some Ministries,⁶⁶ information on the results of monitoring and evaluation of normative legal acts of the Government of the Kyrgyz Republic is available. Unfortunately, according to the interviewed journalists and civil society, according to the reports, it is not clear how effectively the efficiency of the KR Government normative legal acts is monitored and evaluated.

Executive authorities try to respond to requests and appeals of citizens within 14 business days, as indicated in the law, but different ministries and departments react differently. According to journalists, very often ministries and departments respond to requests purely formally and do not respond to the essence of the request.

INTEGRITY MECHANISMS (LAW) - 50

To what extent are there mechanisms in place to ensure the integrity of members of the executive?

Legal framework of Kyrgyzstan contains certain rules to ensure the integrity of officials of the executive branch, but the mechanisms for implementation of these rules are not sufficient.

Integrity mechanisms for government officials, including members of executive branch, are set out in the Law on the Civil Service and Municipal Service,⁶⁷ in the Anti-Corruption Law,⁶⁸ in the law on the Conflict of interest and in the Code of Conduct for Civil and Municipal Servants of the Kyrgyz Republic.⁶⁹ The first one establishes the general rules of behavior, whereas the provisions of the latter are more detailed. (See the section “Public Service” for more details).

Code of Conduct obliges civil and municipal servants not to go beyond the scope of official authority, to prevent the predominance of personal and party interests over the interests of the society and of the state, as well as to immediately inform the management and relevant authorities about violations of the legislation of the Kyrgyz Republic that have become known to them.⁷⁰

Personnel is required to facilitate prevention of corruption at work.⁷¹ In cases when a civil servant becomes aware of facts of corruption committed by other servants, he is obliged to immediately notify in writing his management and the relevant anti-corruption law enforcement authorities. At the same time, the management shall be obliged to ensure the protection of the staff who reported the facts of corruption, up to the appeal to law enforcement agencies.

Behavior of officials with regards to compliance with ethical standards and rules of conduct is assessed by the Ethics Committee.⁷² Compliance with the principles and norms of conduct is a prerequisite for performance of the officials and is taken into account in relation to their promotion, performance evaluation and formation of the human resources reserve.⁷³

Anti-Corruption Law⁷⁴ establishes guarantees of government protection for persons assisting in the fight against corruption. For example, information about the person assisting in the fight against corruption is a state secret and shall be presented only at the written requests of the authorized anti-corruption government bodies, or of court in the manner established by the KR legislation. This law

⁶⁶ <http://mineconom.gov.kg/ru/monitornpa>, <http://www.minfin.kg/ru/novosti/pravovaya-kultura-naseleniya-/5789>, <https://mvd.gov.kg/index.php/rus/explore/normative-base/314-informatsiya-ob-itogakh-provedennogo-podrazdeleniyami-mvd-kyrgyzskoj-respubliki-monitoringa-i-otsenki-effektivnosti-normativnykh-pravovykh-aktov-pravitelstva-kyrgyzskoj-respubliki>

⁶⁷ KR Law ‘On Civil Service and Municipal Service’, dated May 30, 2016 № 75

⁶⁸ Anti-Corruption Law dated August 8, 2012 No. 153

⁶⁹ Code of Conduct for KR Civil and Municipal Servants, dated August 19, 2016 No. 43

⁷⁰ Code of Conduct for KR Civil and Municipal Servants, dated August 19, 2016 No. 43 (Art. 5)

⁷¹ Code of Conduct for KR Civil and Municipal Servants, dated August 19, 2016 No. 43 (Art. 8)

⁷² Code of Conduct for KR Civil and Municipal Servants, dated August 19, 2016 No. 43 (Art. 17)

⁷³ Code of Conduct for KR Civil and Municipal Servants, dated August 19, 2016 No. 43 (Art. 3)

⁷⁴ Anti-Corruption Law, dated August 8, 2012 No. 153 (Art. 10 p. 1)

also⁷⁵ obliges to cover by media the information about corruption-based offenses, and regulates relations in a conflict of interest. Thus, for example, government bodies through the media should inform the public, on the basis of the published information, about the manifestations of corruption.

INTEGRITY MECHANISMS (PRACTICE) - 25

To what extent is the integrity of members of the executive ensured in practice?

Ministry of Health, Ministry of Economic Development and Trade, Ministry of Transport and Communications, Ministry of Industry, Energy and Fuel Resources, Ministry of Youth Affairs⁷⁶ have their own Codes of Conduct for personnel as well as Code of Conduct for KR civil and municipal servants⁷⁷.

The degree of their effectiveness is questionable, since the Code of Honor does not have enough power in our society. Unfortunately, the behavior of officials cannot be regulated only by laws. There are areas of life that are not subject to Penal Code or Codes of Misconduct or Violation, but are, nevertheless, under the scrutiny of citizens. Violation of ethics, morality, decency in cases with public servants should be a sufficient basis for taking action. In this case, the Code would become a real-life tool to keep civil servants in good moral shape.

In the media one can often see a violation of the ethical principles of officials. For example, it is not the ethical behavior of a plenipotentiary representative of the Government in the Chui Oblast over which a scandal erupted, where the plenipotentiary representative responded to the journalist that he would not answer questions because he did not like the appearance.⁷⁸

The effectiveness of legislation in the field of "On the protection of persons reporting corruption offenses", "On conflicts of interest", see more in the section "Public service"

PUBLIC SECTOR MANAGEMENT (LAW AND PRACTICE)- 50

To what extent is the executive committed to and engaged in developing a well-governed public sector?

Kyrgyzstan has a number of legal provisions regarding the administration of the executive branch of public sector, while primarily the Parliament shall be responsible for determining and approving the Action Program of the Government, which is the sovereign public policy in the field of civil service.

According to the law,⁷⁹ the civil service management system is composed of the following: Civil and Municipal Service Board; authorized government body for civil service and municipal service; Permanent Secretaries of governmental organizations; Personnel Management Offices of government bodies or an authorized person for personnel management.

For preparation of proposals related to development of economic sectors or areas of public administration, for development of draft decisions of the Government and for reviewing the disagreements thereon, as well as for the implementation of certain instructions of the Government, the Committees and Working Groups of the Government may be established.⁸⁰ Office of the Government is formed to support the performance of the Government, to ensure coordination,

⁷⁵ Anti-Corruption Law dated August 8, 2012 No. 153 (Art. 15 p. 2)

⁷⁶ <https://online.toktom.kg/Toktom/DocumentList/Page?documentListId=432e81c0-0080-412d-90c9-bda0770ea4d5&page=0&nameFtsExpr=%D1%8D%D1%82%D0%B8%D0%BA%D0%B8%20%D0%B3%D0%BE%D1%81%D1%83%D0%B4%D0%B0%D1%80%D1%81%D1%82%D0%B2%D0%B5%D0%BD%D0%BD>

⁷⁷ KR Code of Conduct for Civil and Municipal Servants, passed by the Decree No. 43 of the Board on Civil Service and Municipal Service, dated August 1943.

⁷⁸ https://24.kg/vlast/119839_vlast_ismi_hamstvo_kak_obrazets_kyrgyzskogo_chinovnika/

⁷⁹ KR Law 'On Civil Service and Municipal Service', dated May 30, 2016 N 75 (Art. 5)

⁸⁰ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85 (Art. 15, 16)

monitoring and control over implementation of its decision, over performance of the executive authorities related to implementation of their goals and objectives.

To carry out a performance assessment and to raise the responsibility of the management of executive public authorities and local governments, the Decree of the KR Government⁸¹ has approved the following: Methodology for evaluating the performance of public authorities and local governments; Regulation on the 'Index of Confidence of the Population' with regards to performance of public authorities and local governments; Model Questionnaire to determine the level of public confidence in the performance of public authorities and local governments of the Kyrgyz Republic.

It is worth noting that according to the 2019 Public Confidence Index,⁸² the six following ministries have a very low confidence index: KR Ministry of Health -17.0; KR Ministry of Economy - 20.6; KR Ministry of Finance - 22.2; KR Ministry of Internal Affairs - 23.0; KR Ministry of Transport and Roads - 24.6; and KR Ministry of Justice - 26.5.⁸³

In accordance with the Constitutional Law⁸⁴, Public Councils may be established under the ministries, State Committees, and administrative departments in order to provide for interaction of government bodies with civil society for the purpose of raising the transparency of decision-making and implementation procedures. Members of Public Councils are representatives of not-for-profit organizations, academia, business associations, professional and industry unions, and expert community members from the areas related to the activities of the relevant government bodies. (See 'Civil Service' for more details).

Constitutional Law⁸⁵ provides for participation of the Government in the implementation of domestic and foreign policies of the country, in the approval of the concept and development of Government programs; in ensuring the implementation of fiscal, price, tariff, investment, foreign economic, tax and customs policies, in the implementation of measures to ensure the legality, the rights and freedoms of citizens, protection of public order, and anticrime activities; in the development and submission to the Parliament of the National budget and ensuring its implementation; in providing the Parliament with a report national budget execution, etc.

LEGAL SYSTEM - 25

To what extent does the executive prioritize public accountability and the fight against corruption as a concern in the country?

In March 2003, for the first time in Kyrgyzstan, the Anticorruption Law was adopted, which became invalid with the introduction of the Anticorruption Law on August 8, 2012 No. 153. A number of anti-corruption Programs and Plans were also adopted. The above regulations were aimed at the identification, prevention and suppression of corruption offenses, at bringing the perpetrators to justice, and at determining the legal and institutional anticorruption frameworks.

In 2005, the KR National Anticorruption Strategy was adopted⁸⁶ which is the anti-corruption policy document that defines its basic principles and approaches. In 2009, the KR National Anti-Corruption Strategy⁸⁷ and the Action Plan for its implementation for the period 2009-2011 were adopted. At

⁸¹ Decree of the KR Government 'On Evaluation of the Performance of the KR Public Executive, Bishkek and Osh City Administrations and their Heads, Plenipotentiaries of the KR Government in the Regions', dated June 17, 2016 No. 329

⁸² <http://www.stat.kg/ru/indeks-doveriya-naseleniya/> mean 2019 Public Confidence Index is 27.8.

⁸³ <http://www.stat.kg/ru/indeks-doveriya-naseleniya/>

⁸⁴ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012 N 85 (Art. 25 p. 6)

⁸⁵ KR Constitutional Law 'On the Government of the Kyrgyz Republic', dated June 18, 2012N 85

(Art. Art. 4, 10, Art. 11)

⁸⁶ Governmental Anti-Corruption Strategy in the KR, passed by the Decree of the Acting KR President dated June 21, 2005 N 251

⁸⁷ National Strategy for combating corruption in the KR approved by the Decree of the President of the KR of March 11, 2009 No. 155

present, the KR State Anti-Corruption Policy Strategy⁸⁸ is in force and departmental anti-corruption action plans have been developed.

In order to implement the Decree⁸⁹ of the President of the Kyrgyz Republic 'On the Government Strategy of Anti-Corruption Policy of the Kyrgyz Republic, and Anti-Corruption Measures', the Government passed the Anti-corruption Action Plan of the governmental bodies of the Kyrgyz Republic for 2019-2021.⁹⁰ However, the State Strategy and the developed Plans for them cause a lot of criticism in terms of formality, poor implementation, which is confirmed by the fact that Kyrgyzstan has not yet achieved a significant reduction in the level of corruption.

Then, in 2012, the new Anti-Corruption Law was adopted,⁹¹ where the KR President defines the key directions of public policy in the anti-corruption field. According to the law, by the decision of the President, the consultative and advisory bodies were formed representing the governmental bodies, the law enforcement agencies and local authorities.

Upon receipt of data on the commission of corruption offenses, the relevant authorities in charge of coordination of the anti-corruption activities should forward them to the relevant public authorities for verification of the information, and to make decisions based on the findings of the audit in the manner prescribed by law.

The Government distributes the main functions and tasks between the executive bodies that carry out the fight against corruption. Prosecutor General and authorized prosecutors, within their powers, shall coordinate the activities of public authorities and public administration bodies in the fight against corruption, collect and analyze information on the state of corruption in the public administration system, evaluate the effectiveness of measures taken, the degree of threats to national security resulting from corruption and, if necessary, submit relevant proposals for consideration to the Secretariat of the KR Security Council.

Ministry of Justice, through mass media or through Internet resources should implement the legal advocacy, the expansion and dissemination of knowledge about prevention of corruption in the population. However, this advocacy is taking place in a slow mode. Public authorities and their officials are obliged to inform the prosecution authorities and authorized anti-corruption units about the facts of non-compliance by the civil or municipal servants with the restrictions and prohibitions, with the requirements to prevent or resolve a conflict of interest, or non-performance of duties.

In 2015, by the Decree of the KR Government, the Model Regulation on the Commissioner for Prevention of Corruption in Public Authorities and Local Governments of the Kyrgyz Republic⁹² was passed.

In 2019, the Ministry of Finance⁹³ passed the 2020 Anti-Corruption Action Plan⁹⁴ based on the approved Anti-Corruption Action Plan for Public Authorities of the Kyrgyz Republic for 2019-2021⁹⁵ in accordance with the Decree of the President of the Kyrgyz Republic⁹⁶.

On September 15, 2015, by the Resolution of the Government of the Kyrgyz Republic No. 454-p the Regulation on the Anti-Corruption Board of the Government of the Kyrgyz Republic was passed to

⁸⁸ The State Strategy of anti-corruption policy of the Kyrgyz Republic was approved by the Decree of the President of the Kyrgyz Republic of February 2, 2012 No. 26

⁸⁹ Decree of the KR President 'On the KR Government Anti-Corruption Strategy, and Anti-Corruption Measures', dated February 2, 2012 N 26

⁹⁰ Anti-Corruption Action Plan of the KR Public Authorities for 2019-2021, passed by the Decree of the KR Government on September 13, 2019 No. 474

⁹¹ Anti-Corruption Law, dated August 8, 2012 N 153 (Art. 6 p. 1-6)

⁹² Decree of the KR Government dated September 16, 2015 No. 642 'On approval of the Model Regulation on the Commissioner for Prevention of Corruption in Public Authorities and Local Government Bodies of the Kyrgyz Republic'

⁹³ Order of the Ministry of Finance of the Kyrgyz Republic No. 135 dated December 9, 2019

⁹⁴ <http://www.minfin.kg/ru/novosti/borba-s-korrupsiey/vedomstvennye-plany-v-sfere-protivodeystviya-korru/plan-meropriyatiy-po-protivodeystviyu-korrupsii-m6230 план>

⁹⁵ Anti-Corruption Action Plan of the KR Public Authorities for 2019-2021, passed by the Decree of the KR Government on September 13, 2019 No. 474.

⁹⁶ Decree of the KR President 'On the KR Government Anti-Corruption Strategy, and Anti-Corruption Measures', dated February 2, 2012 N 26

ensure an effective dialogue between public authorities and civil society in combating corruption. Unfortunately, the Board has worked formally, and no information on the activities of the Anti-Corruption Board is available in the public domain. In 2018, by the Resolution of the Government of the Kyrgyz Republic No. 427-p, the updated Regulation on the resumption of the Anti-Corruption Board under the KR Government was passed. In February 2019, the Resolution of the KR Prime Minister No. 81 approved the membership of the Anti-Corruption Board under the Kyrgyz government. It is difficult for us to say how efficiently the updated Board performs, since there is no information in open sources, except for the approval of the membership of the Board.

According to the IRI research,⁹⁷ despite all measures taken to combat corruption, the majority, 66% of the country's population, believes that the Kyrgyz government does not make enough efforts to fight corruption; 25% believes that the government makes enough efforts; and 9% could not answer this question. In 2017, the 74% of the Kyrgyz population considered corruption to be the biggest problem, while in 2018 already 81% of the population believed so.

Recommendations

1. Strengthen the independence and sustainability of the executive branch, as the frequent changes of senior officials in the Cabinet tend to undermine the continuity of programs and reduce public confidence in the government.
2. Analyze the functions of ministries, state committees, services, agencies, inspectorates and foundations, and local authorities to identify problems of duplication of powers, mixing of their functions and redundancy of the functions.
3. Develop mechanisms for the separation of regulatory, control and political functions, which creates the organizational basis for the inefficient performance of public authorities and of the government, and the emergence of corruption.
4. Strengthen the capacity of civil servants by improving competitive selection, the system of incentives for professional growth of civil and municipal servants and for raising their wages.
5. Improve technical resources in the territorial divisions of the executive.
6. Strengthen the technical parameters of governmental websites to enhance transparency, as well as to make them an effective tool for disseminating information and communicating with public. In order to increase the level of awareness and improve access to information for the population, it is necessary to translate official documents, procedures and Regulations of the Government into a simplified language.
7. Strengthen and timely update the Open Budget website.
8. Implement the constitutional law 'On the Government of the Kyrgyz Republic', where the Government should inform citizens through mass media about issues pending consideration at its meetings and decisions taken thereon. Video and audio recordings of the open Government meeting should be published in full, without reduction, on the official website of the Government or on public video portals with the obligatory placement of the links to the official website of the Government within 2 working days after the meeting.
9. Conduct in practice the public hearings at the initiative of executive authorities, which are practically not held. To develop public feedback mechanisms on the official website of the Government under the section 'Public Discussion of the Normative and Legal Acts'. Decisions and Orders of the Government shall be posted in a timely manner, as well as search service shall be improved.

⁹⁷ https://www.iri.org/sites/default/files/february_2019_kyrgyzstan_poll.pdf

10. Improve and make clear the document on the findings of the Monitoring and Evaluation of Normative and Legal Acts of the Kyrgyz Republic Government, which is posted on the website of the Ministries, because it is not clear to ordinary citizens and journalists how effectively the Monitoring and Evaluation of the Normative and Legal Acts of the Kyrgyz Government are carried out.

11. In order to provide the exhaustive information, to eliminate the need for a repeated request by a stakeholder, it is necessary to strengthen in practice the implementation of the following: Paragraph 3 of Article 11 of the Law 'On Access to Information Held by the National and Local Governments of the Kyrgyz Republic'; Paragraph 49 of the Model Office Workflow Procedure of the Kyrgyz Republic.

12. Develop a new effective and feasible National Anti-Corruption Strategy in Kyrgyzstan, because Kyrgyzstan has not achieved a significant reduction in the level of corruption.

13. Ministry of Justice should effectively carry out legal propaganda among the population, expand and disseminate knowledge on corruption prevention through mass media or through Internet resources.