



# Final Evaluation Report

## Implementation of the Civil Society Development Strategy 2012-2015

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## Disclaimer

The evaluator made efforts to assure that the evaluation and the information presented in this report is full and accurate. However, any errors that may appear in this report are non-deliberate, although the evaluator is responsible for them. This report reflects the evaluator's point of view based on the evaluation findings and it does not necessarily represent the opinions of USAID or of the European Center for Non-for-profit Law (ECNL) and/or of the constituents consulted during the evaluation.

## Glossary

- AP – Action Plan
- CPA – Central Public Authorities
- CReDO – Human Rights Resource Center
- CSDS – Civil Society Development Strategy
- CSOs – Civil Society Organizations
- ECNL – European Center for Non-for-Profit Law
- EEF – East European Foundation
- EU – European Union
- LPA – Local Public Authorities
- MLSPF – Ministry of Labor, Social Protection and Family
- MYS – Ministry of Youth and Sports
- NBS – National Bureau of Statistics
- NFE – Non-formal Education
- NGO – Nongovernmental Organization
- NNC – National NGO Council
- NPC – National Participation Council
- NYCM – National Youth Council of Moldova
- RM – Republic of Moldova
- SA – Social Entrepreneurship
- SME – Small and Medium-sized Enterprises
- TDV – NGO "Youth for the Right to Live"
- ToR – Terms of Reference
- USA – United States of America
- USAID – US Agency for International Development

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## SUMMARY

This report represents the conclusions and recommendations resulted from the evaluation of the implementation of the Civil Society Development Strategy (CSDS) for 2012-2015 and of its Action Plan (AP).

The CSDS, accompanied by an Action Plan, comprises 3 areas of intervention each, representing a separate objective with specific objectives and actions: Objective 1: “Strengthening the framework of participation of the civil society in developing and monitoring the implementation of public policies”; Objective 2: “Promotion and strengthening of the financial sustainability of the civil society”; Objective 3: “Development of the active civic spirit and volunteering”

The purpose of the final evaluation was to review the implementation of the CSDS and AP for the period between 2012 and 2015, identify the achievements and gaps in the implementation and make recommendations on how to enhance its relevance and effectiveness.

The evaluation methodology was developed by the evaluator and approved by ECNL, and included the following evaluation techniques and tools: review of documents, online evaluation surveys and semi-structured interviews (individual meetings, focus groups, Skype) with 54 persons, representatives of the civil society, state authorities and donors’ community.

Although there was no formal ex-ante evaluation, the CSDS is based on the findings, conclusions and recommendations of a number of studies, monitoring reports and relevant resolutions that had taken place prior to its development and that cover all the three areas of the CSDS<sup>1</sup>.

The CSDS and AP, as a whole, are consistent and coherent, extremely ambitious, and follow the logic of the intervention, from reviewing the contexts, to making policies, and then to implementing them.

As a result of the final evaluation, one can conclude that the CSDS is relevant for the current context and that the 3 intervention areas included therein reflect the key needs of development of the Moldovan civil society.

In what concerns the implementation of the CSDS, it took place in a political unstable and performance unfavorable environment, although when the CSDS was developed, the national context was relatively stable.

The final evaluation shows that ***a slow progress has been made and there are certain implementation achievements in all the three areas/general objectives of the CSDS. Nonetheless, the main finding and general conclusion is that most of the commitments made under the CSDS were not fully achieved (either were not completed or were not even started).***

More precisely, ***the level of implementation of the actions assumed under the CSDS represents nearly 27%; other 9% of actions are at an advanced level of achievement, and 64% of the commitments made have not been achieved, including 52% of actions were not started.*** Thus, the results of the implementation of the commitments of the CSDS and PA are under the expected level and modest as compared to the results published, although certain progress is visible in the

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<sup>1</sup> They are specified in the report.

achievement of some common initiatives of state authorities and the Moldovan CSOs, as described further in the report.

There were various factors that affected the implementation of the CSDS: political, financial and related to management and coordination. This is an opportunity to learn certain lessons and change certain aspects in the future.

General Objective #1: *Strengthening the framework of participation of the civil society in developing and monitoring the implementation of public policies* registered a better level of achievement of the commitments (36%) as compared to the other CSDS objectives, and two examples of good practices,<sup>2</sup> described in the report. The progress made by the central public authorities regarding “decision-making participation and transparency”, especially at the civil society consultation stage.

Not the same can be said about the achievements at the local level, the publication of the divergence table by the authorities and setting up of a unit responsible for the cooperation with the civil society. These and other actions have not yet been honored and would make the object of future commitments in this sense.

General Objective #2: *Promotion and strengthening of the financial sustainability of the civil society* turned out to be the most sensitive one, which faced much resistance from the central public authorities and, therefore, the progress has been slow and the achievements (19%), as a whole, are much under the expected level, with a failure to develop the mechanism for enforcing the 2% law; the legal framework on social entrepreneurship currently being developed; and a failure to develop social contracting yet, while setting up specialized funds to support the civil society have not even come to be discussed by the CSOs and state public authorities.

The evaluation also found some achievements related to book-keeping and funds management in the noncommercial sector as well as examples described in the report that can be assessed as good practices<sup>3</sup> that should be replicated.

General Objective #3: *Developing the active civic spirit and volunteering*, although it is a little under the level of implementation of CSDS (26%), it has achieved tangible results and a clear progress in regulating and recognizing volunteering as well as applying this provision, such as: accreditation of host organizations, documenting the volunteer status, recognizing volunteering as part of the length of service etc.

Although there were many dissensions, the cooperation between the Ministry of Youth and Sports (MYS) and the Secretariat of the Volunteering Coalition is an example of integration of volunteering in the legal regulations and that can be assigned to good practices and replicated in the future. However, there are many AP actions under this objective that have not been achieved and are described in the report, e.g. creation of a school for coordinators of volunteers, creation of a National Volunteering Center etc.

The cost-efficiency evaluation of the CSDS is problematic because relevant data on the funds allocated and consumed in the implementation of the CSDS are missing. The costs planned for the

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<sup>2</sup> 1) The joint training course for the representatives of state authorities and CSOs within the Military Academy of Armed Forces “Alexandru cel Bun” and 2) the Advisory Board in making policies, set up by the Ministry of Economy and made up of representatives of the ME, and the private and associative sectors.

<sup>3</sup> E.g. the Working Group for the Social Entrepreneurship set up under the MoE and the amendments made by it to the Moldovan legal framework.

implementation of the CSDS have been only partially implemented<sup>4</sup> (34 of 88 actions) with the total amount of MDL 4,190,000. Due to lack of information, it was not possible to establish the effective budget used in the implementation of the CSDS and, hence, the relation between the resources allocated and the results obtained cannot be reviewed either as a whole or per each general objective in part. There are various reasons for that and they are described in the report.

As a whole, the evaluation finds that CSDS actions have been supported by: USAID via FHI 360, Swedish Government/SIDA via the East-European Foundation; MYS (small grant program) from the state budget; UN Population Fund; Pontis Foundation; FERSO and RITA organizations from Poland.

The sustainability of achievements at the level of public policies developed and results of interventions at public policy level can be found in all three components/general objectives of CSDS, which have materialized in amendments made to the exiting legal framework e.g. the Law on Transparency in Decision-Making, Law on Volunteering etc. and the mechanisms (developed or currently being completed) for enforcing various laws e.g. the 2% Law, the Volunteering Law etc. The sustainability of such interventions and results is assured via their integration in the legal framework of Moldova and the mandatory character of enforcement thereof with this.

As to the institutionalization of the results obtained, the evaluation finds that they are insignificant, one of the exceptions being the setting up of the Commission for the Certification of host institutions for volunteering (Pillar 3). Another institutionalization attempt was the determination of the contact persons in ministries for the implementation of the CSDS. This can be considered a good practice; however, it did not have consistency because those persons had many responsibilities in continuity. Most of the actions envisaged in the CSDS that contained aspects of institutionalization have not been implemented<sup>5</sup> and represent one of the weaknesses in the implementation of the CSDS. The financial sustainability of the results of the implementation of the CSDS greatly depends on their institutionalization and ownership. If the institutionalization of the results of the implementation of the CSDS is non-significant, the aspects of their financial sustainability become irrelevant or, in the best case, minor.

The evaluation found certain conceptual discrepancies between the civil society actors and the governmental structures with regard to the responsibility for implementing the CSDS and the financial commitments. These were obvious and visible, were well felt during the development and implementation of the CSDS, and affected the CSDS ownership and achievements (see the report).

The development and implementation of the CSDS implies the need to learn some detailed lessons in the report.

*First:* when making commitments, account must be taken of the implementation capacity and the available human and financial resources, or the financial commitments to be materialized in the future.

*Secondly:* it is important to realize that implementing complex multi-sector commitments, such as the civil society development ones, implies a much consistent involvement both from the state public

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<sup>4</sup> See PA of the CSDS 2012-2015.

<sup>5</sup> E.g. setting up of a unit responsible for the cooperation with the civil society; setting up of an Ethics Board within the National NGO Council; setting up of a Specialized Fund for supporting the Civil Society; setting up of a National Independent Volunteering Center and of the National Volunteer Coordinators School; developing 3 regional volunteering centers.

authorities, civil society organizations and the donors community (of various rank and level) that interacts with the civil society.

*Third:* the common vision, availability of involvement, commitment and ownership should not be underestimated because during the implementation of the CSDS, these aspects or better to say their lack substantially affected the performance.

*Fourth:* half measures usually do not work and do not generate plausible and sustainable results. E.g. the failure to create the unit responsible for the cooperation with the civil society and the attempt to solve the problem with a focal point that has tens of other tasks in addition to the cooperation with the civil society proved to be unsuccessful and did not work. This is one of the reasons why the cooperation between the civil society and the state public executive authorities was adverse as a whole, with some exceptions that can serve as good practices. Other lessons to be learned are described in the report.

There are also good practices identified during the final evaluation that should be replicated because they proved to be fruitful.

One of the good practices is the redressing of the approach in the Social Entrepreneurship Subcomponent, where initially the draft law was rejected and seemed a blocked initiative but after a number of rounds of debates in 2015 this situation was unblocked and the newly created Working Group on Social Entrepreneurship that works under the coordination of the Ministry of Economy re-launched this subject. This is a positive example that can be attributed to the “good practices” when after the failure to approve an initiative, the mixed working group of CSOs and state authorities managed to identify an acceptable solution to all the stakeholders and is about to be completed and submitted to the Government for endorsement and further submission to the Parliament.

Another example that can be attributed to good practices is the productive cooperation between the Volunteering Coalition Secretariat and the MYS, and the amending of the legal framework on volunteering, recognizing volunteer work as length of service, as well as the inclusion of other provisions. The development of accreditation regulations, setting up of the respective commission and the proper accreditation of about 60 CSOs as host institutions as well as the development of IDs for volunteers is another argument in favor of perceiving this situation as “good practices” worth replicating.

These achievements can be classified as success stories.

The final evaluation makes a range of recommendations that can be grouped into strategic recommendations; conceptual recommendations; and operational recommendations, as follows (and better explained in the report):

*Strategic recommendations:*

1. Develop a new Civil Society Development Strategy for 2017-2020;
2. Keep in the CSDS 2017-2020 the priority areas of the CSDS 2012-2015;
3. Enhance accountability for the implementation of the CSDS.

*Recommendations for the general objectives:*

4. Reformulate and adjust the general objective #1 of the CSDS;
5. Strengthen the efforts on the general objective #2 of the CSDS;
6. Gradually withdraw from the General Objective #3 and refocus efforts on the general objectives #1 and #2 of the CSDS.

*Conceptual recommendations*

7. Revitalize the National Participation Council;
8. Use findings, conclusions, and eventually the recommendations of various studies in developing and monitoring the implementation of the CSDS;
9. Evaluate CSDS implementation costs and budget them;
10. Map active NGOs and the potential donors and involve them in supporting the implementation of the CSDS.
11. Make grant provision to NGOs transparent.
12. Promote the CSDS more actively, including at the local level and involve more actively local public authorities and local NGOs.
13. Create and interconnect dialog platforms between the civil society and state public authorities.
14. Translate the CSDS, including the AP, and its monitoring and evaluation reports to Russian.

*Operational recommendations*

15. Develop reporting templates and report against updated progress indicators;
16. Carry out an interim evaluation of the CSDS.

## Part 1 BACKGROUND AND INTRODUCTION

### A. BACKGROUND

The Civil Society Development Strategy (CSDS) for 2012–2015 and the Action Plan (AP) for implementing the CSDS were approved by the Moldovan Parliament by Law No. 205 of 28 Sept 2012 that became effective on 4 January 2013 upon its publishing in the Official Gazette. The Moldovan Government, in cooperation with nongovernmental organizations, within 4 months, were to set up the structure responsible for the cooperation with the civil society (made up of representatives of the executive bodies and of the civil society), by coordinating and monitoring the implementation of the CSDS and its AP.

The working group for developing the CSDS and AP (2012–2015) was set up based on the Disposition of the Speaker of the Parliament DD/C-1 no.10 of 9 Feb 2012 and was to monitor the implementation of the CSDS and AP alongside the unit responsible of the cooperation with the civil society.

The CSDS for 2012-2015 continues the efforts of the CSDS for 2009–2011.6. Although the AP of the previous CSDS was not approved, some activities referring to the development of the civil society had been implemented in the previous period. For instance, there were developed and passed amendments to the Law on the Civic Association in the part related to the public benefit. A working group for amending the noncommercial legislation was set up under the Ministry of Justice. The Moldovan Parliament passed the Law on Volunteering, thus starting building an enabling framework for volunteering. It also passed the Law on Social Services that acknowledges civic associations as a social service provider and launched the Grant Program for youth CSOs and the necessary legal framework was also developed.

The CSDS for 2012-2015, accompanied by an Action Plan, contains 3 areas of interventions each, representing a separate objective with specific objectives and actions.

- *Objective I: “Strengthening the framework of participation of the civil society in developing and monitoring the implementation of public policies”;*
- *Objective II: “Promotion and strengthening of the financial sustainability of the civil society”*
- *Objective III: “Developing the active civic spirit and volunteering”*

The AP of the CSDS 2012-2015 details the interventions per each objective assumed (in terms of “activities” and “actions”), specifies the responsible parties and the implementation partners, and contains a section on the funding sources.

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<sup>6</sup> Approved by the Parliament Decision no. 267-XVI of 11 Dec 2008

## **B. INTRODUCTION**

### **1. About the evaluator**

The evaluation of the CSDS and AP for 2012-2015 was conducted by Gheorghe Caraseni, Evaluator and Consultant, Member of the International Program Evaluators Network (IPEN), GOPA Consultants (Germany) and of the Independent Reporting Mechanism (IRM) of the Open Governance Partnership (USA). Gheorghe has national and international experience of over 20 years in strengthening organizational capacities and civil society development, including circa 10 years of experience in evaluating programs, projects and strategies in Moldova and in other eight CIS countries (Ukraine, Georgia, Armenia, Azerbaijan, Belarus, Russia, Kazakhstan and Uzbekistan).

The evaluator was selected by ECNL as a result of an open contest published on the information portal [civic.md](http://civic.md)<sup>7</sup> and on the official website of FHI 360<sup>8</sup>.

### **2. Purpose of the evaluation**

To review the implementation of the CSDS and PA for 2012-2015, identify the achievements and gaps in the implementation and make recommendations for enhancing its relevance and effectiveness.

### **3. Objectives of the evaluation**

The final evaluation in the implementation of the CSDS and PA 2012-2015 has had a number of objectives and aimed to:

- Determine the level of implementation of the AP actions;
- Identify to what extent the CSDS reached its goal to improve the legal framework and the activity context of CSOs in Moldova;
- Review the level of cooperation between state public authorities and the civil society (Government–CSOs and Parliament–CSOs) in the period subject to evaluation 2012-2015;
- Identify and then describe in short 4 or 5 successful achievements and the reasons that contributed to that success;
- Review and present the main gaps in the implementation of the CSDS;
- Determine the level of knowledge about the CSDS among various partners and its relevance for the sector;
- Identify the needs in civil society development that are included in the CSDS 2012-2015;
- Make recommendations for CSOs and state authorities about the next steps in strengthening the civil society in Moldova.

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<sup>7</sup> See <http://www.civic.md/angajari/30805-apel-pentru-candidaturi-evaluarea-implementarii-CSDS-de-dezvoltare-a-societatii-civile-2012-2015.html>

<sup>8</sup> See <http://fhi360.md/index.php/en/newsroom/news-archive/487-apel-pentru-candidaturi-evaluarea-implementrii-CSDS-de-dezvoltare-a-societii-civile-din-r-moldova-20122015.html>

## Part 2 METHODOLOGY OF EVALUATION

### 2.1 Principles of evaluation

The process of evaluation was structured in accordance with the set of variables developed by the evaluator according to the requirements stipulated in the Terms of Reference (TOR). The findings were based on the evidence collected during the evaluation and served as grounds for the respective conclusions. The lessons learned were formulated after a review of the findings and conclusions and the recommendations were structured according to the CSDS areas of intervention.

The evaluator assures the authenticity of all the data collected, analyzed and presented including of the conclusions and recommendations in order to enhance the efforts of development of the civil society in Moldova. The evaluator took as a guide the principles of an impartial and independent evaluation, offering credibility through his expertise as well as by knowing the situation of the civil society in Moldova and having specific evaluation knowledge in the non-for-profit area.

Another principle used as a guide by the evaluator was promptness and accessibility of the data reviewed and of the recommendations made. The evaluator provided a report and an evaluation process that complies with the ToR requirements, observed the deadlines, presented the information in a structured manner, separating the evaluation conclusions from the recommendations.

### 2.2 Evaluation methodology

From a methodological point of view, the evaluator used a mixed approach by applying various methods for collecting and/or verifying/triangling the corresponding information, thus removing the contradictions and assuring trust in the validity of the methodology. The evaluation methods decided upon were not used by accident but in order to be mutually complemented with the other methods and evaluation tools. The evaluation methodology was developed by the evaluator and approved by ECNL–Budapest, and included the following evaluation techniques and tools:

- **Review of the relevant documents** such as: the SDSC for 2012–2015, PA for implementing the SDSC for 2012–2015, the Advisory Opinion to the draft Parliament Decision for approving the CSDS for 2012–2015 and its AP, the reports of the Government and of the civil society on the implementation of the CSDS and AP for 2012-2015, and other relevant documents (See attached the *List of documents consulted*);
- **Evaluation surveys** were developed after studying the documents and included an interview questionnaire and an online survey questionnaire. The online questionnaire, after the evaluation of the implementation of the CSDS for 2012-2015, includes 9 relevant questions for determining the achievements, weaknesses and recommendations related to the CSDS for 2012-2015. The questionnaire was approved by the ECNL and posted together with the announcement on 16 March 2016, on the information portal [www.civic.md](http://www.civic.md)<sup>9</sup>, on the official webpage of the Chisinau CONTACT Center [www.contact.md](http://www.contact.md)<sup>10</sup>, on the official page of FHI

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<sup>9</sup> See <http://www.civic.md/stiri-ong/31847-evaluarea-implementarii-CSDS-de-dezvoltare-a-societatii-civile-2012-2015.html>

<sup>10</sup> <http://contact.md/index.php/ro/toate-noutatile/269-evalueaza-implementarea-CSDS-de-dezvoltare-a-societatii-civile-2012-2015>

360<sup>11</sup> and on the Facebook page of OCT CARASENI<sup>12</sup> (*See announcement and questionnaire attached*).

- ***Semi-structured interviews.*** The opinions of a total number of 54 persons were consulted, including representatives of the civil society (27 persons), state authorities (17 persons) and donors community (10 persons). There were organized 8 individual meetings, 8 focus groups, 5 Skype and telephone interviews and 3 questionnaires were received online (See attached the *List of persons consulted*).

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<sup>11</sup> See <http://www.fhi360.md/index.php/en/component/content/article/494-evalueaz-implementarea-CSDS-de-dezvoltare-a-societii-civile-20122015.html>

<sup>12</sup> See <https://www.facebook.com/caraseni.oct/>

## Part 3 FINDINGS AND CONCLUSIONS

This section of the report comprises information about the findings of the final evaluation of the implementation of the CSDS and AP for 2012-2015. The findings and conclusions are not set forth in the order of their importance but rather structured according to the evaluation questions and variables as provided by the ToR.

The CSDS was developed at the initiative of the civil society with the support of the Moldovan Parliament in a participatory manner within three topical working groups<sup>13</sup> made up of representatives of the civil society and state authorities who conducted in total about 30 working meetings during 2012. Subsequently, the CSDS and AP were approved by the Moldovan Parliament<sup>14</sup>, which represents a democratic, inclusive and open exercise.

Based on the conclusions of the final evaluation, one can conclude that the *CSDS for 2012-2015 is relevant for the current context and the three areas of intervention included in the Strategy* (“Decision-making participation and transparency”, “Financial sustainability of the CSOs” and “Civic activism and volunteering”) and *reflects the key development needs of the Moldovan civil society. The implementation of the CSDS took place in a politically unstable and performance unfavorable environment. The results of the implementation of the commitments made under the CSDS and AP are modest as compared to the results planned, although certain progress is visible in the implementation of common initiatives in all the three areas of the CSDS. Nonetheless, as a whole, the results of implementation of the CSDS are under the expected level, and the factors that affected the implementation of the CSDS are diverse, both political, financial and related to management and coordination. This serves as an opportunity to learn certain lessons and change certain issues in the future.*

The findings of the final evaluation according to the ToR requirement are presented below.

### 3.1 Relevance of the CSDS

#### 3.1.1 Relevance of the CSDS in the national context and for the development needs of the civil society.

After the consultations with all the state and civil society players, of planning documents and study and monitoring reports, *the evaluation confirms that the priorities set in the CSDS text are relevant for the national context and reflect the needs of the Moldovan civil society.*

A strong argument in favor of the CSDS relevance is the fact that the priorities shown in the CSDS included the reforms assumed by the Moldovan authorities and that were already ongoing when the CSDS was developed (e.g. making the decision-making transparent, developing the social contracting mechanism, improving the legal framework for volunteering, tax reforms), with many normative acts having been adopted in the corresponding areas and reflected in the previous civil society development strategy of Moldova (2009-2011) but that required regulations for further application. Of course, the CSDS included new commitments e.g. setting up in the Government of

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<sup>13</sup> O I: “Strengthening of the framework of participation of the civil society in developing and monitoring the implementation of public policies” – led by the NPC; O II: “Promotion and strengthening of the financial sustainability of the civil society” – led by the NGO Council; and O III: “Developing the active civic spirit and volunteering” – led by the Volunteering Alliance.

<sup>14</sup> The CSDS was approved by the Moldovan Parliament by Law No.205 of 28 Sept 2012 and published in the Official Gazette on 4 Jan 2013.

a unit for the cooperation with the OSC, developing a mechanism for public funding from the state budget etc.

Although no ex-ante evaluation has been conducted, the CSDS is based on the findings, conclusions and recommendations of many studies, monitoring reports and relevant resolutions that took place prior to developing it and that cover the three areas of intervention of the CSDS, e.g.: the study “*NGO Sustainability Indicator*” (USAID 2010 and 2011), the study “*Transparency and Financial Sustainability of Moldovan Nongovernmental Organizations*” (Contact 2011), the study on the *Development of Moldovan Nongovernmental Organizations* (UNDP, 2007), Final report on the *Monitoring of the Observance of Transparency in Decision-Making* (ADEPT, 2011), the report on *Monitoring and Evaluation of the Implementation of the Reform of the Central Public Administration* (ADEPT, 2010), *NGO Forum resolutions* (2008, 2011), the report on the “*Financial Strengthening of the Civil Society by Introducing the Mechanism of Designating a Part of the Income Tax to Public Benefit Noncommercial Organizations*” (CREDO, 2011), the study “*Infrastructure of corporate volunteering in Moldova: Potential and a Way to Follow*” (TDV, 2012), the report “*Evaluation of the impact of legislative amendments to public benefit on civil associations*” CREDO (2010) etc.

The CSDS and AP, as a whole, are consistent and coherent and follow the logic of intervention from reviewing the contexts to making public policies and then to implementing them. The State Chancellery requested a repeated endorsement of the CSDS and AP prior to approving it, invoking errors and making recommendations related to the legislative techniques, conceptual, technical and division of responsibilities, as well as noting that the opinions of the representatives of ministries were not taken into account during the working meetings. In the evaluator’s opinion, the feedback of the State Chancellery, as a whole, targets the operational level and does not change considerably the CSDS three topical areas of intervention but rectifies certain issues mentioned above. The feedback of the State Chancellery is not found in the CSDS or in the AP for 2012-2015, which later generated involvement and ownership deficiencies (described below), confirmed by the persons consulted during strategy evaluation.

### **3.1.2 Relevance of the players involved in developing and implementing the CSDS**

The evaluation found that the CSDS was developed by the relevant players.

Thus, the CSDS was developed by the key players, active CSOs with expertise from the civil society associated in councils and alliances (the NGO Council, the National Participation Council, the Volunteering Alliance) and executive state public authorities (State Chancellery and line ministries) with the support of the Moldovan Parliament that took over the initiative and assured that the process was appropriately organized and coordinated. The Parliament hosted a number of working group meetings chaired by Ms. Liliana Palihovici, Deputy Speaker. The representatives of ministries and of the State Chancellery were involved in all the working group meetings during the development of the CSDS and AP.

The ECNL (Budapest) made recommendations during the development of the CSDS through its international expertise, most of which were incorporated in the CSDS and AP texts.

USAID via FHI 360, the Swedish Government via the East-European Foundation, as well as other donors mentioned in the report, supported various initiatives of many Moldovan CSOs in the implementation of the CSDS.

The state authorities were appointed responsible for the implementation of the CSDS (the State Chancellery, line ministries, Academy of Public Administration, the National Bureau of Statistics, local public authorities) and CSOs, e.g.: CREDO, NPC, NGO Council, ACAP, Expert Grup.

Only civil society organizations are found as partners (see those mentioned above as well as the National Youth Council of Moldova and the Volunteering Coalition. For some actions, given their universal character (valid for all the players), it is simply specified “state public authorities” and “NGOs”.

### 3.2 CSDS Effectiveness

This section of the evaluation report presents the achievements in the implementation of the CSDS.

The findings of the final evaluation show that *slow progress has been made and that there are certain implementation achievements in the three areas/general objectives of the CSDS. Still, the main finding and general conclusion is that most of the commitments made under the CSDS have not been fully implemented (either have not been completed or have not been started). Hence, the level of implementation of the CSDS is modest, i.e. under the expected level.*

In the evaluator’s view, there is a number of key factors that have affected the implementation of the CSDS for 2012-2015, and namely:

- 1) Lack of a structure responsible for the cooperation with the civil society that would bring together representatives from the executive and the civil society, and the weak coordination of the efforts of the state players and of the civil society in the implementation of the CSDS.
- 2) Disagreements between the executive state authorities and the CSOs as well as the mutual allegations of insufficient involvement (see the reports of the Government and of CSOs).
- 3) Insufficient funds and lack of financial commitments from the state budget for the implementation of the CSDS (except for the grants program of the MYS).
- 4) The national context and political instability in Moldova between 2012 and 2015 affected some achievements at the policy level; however, for most of the commitments, the persons responsible for the implementation were the same and not appointed on political criteria<sup>15</sup>

The achievements of the implementation of the CSDS per each general objective are presented below.

#### **General objective #1: Strengthening the framework of participation of the civil society in developing and implementing public policies.**

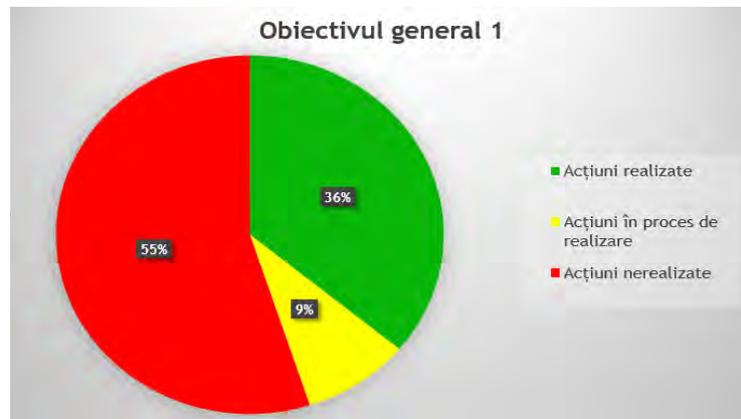
Achieving this objective implied a number of initiatives, including developing institutional mechanisms of cooperation between the public authorities and the civil society by setting up a unit responsible for the cooperation with the civil society in view of strengthening the relation between the Government and the CSOs and by amending the concept of cooperation between the Parliament and the civil society in view of strengthening the cooperation between the legislative authority and CSOs.

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<sup>15</sup> See the list of persons from the central public administration authorities and State Chancery responsible for coordinating the implementation of the CSDS.

The table below shows the achievements under this general objective of the CSDS, which indicates that circa 36% of the actions planned have been implemented, other 9% are in process of implementation, and 55% of actions have not been implemented.

*Table 1: Chart of achievements of General Objective #1 of CSDS 2012-2015 –Strengthening the framework of participation of the civil society in developing and monitoring the implementation of public policies.*



According to the Action Plan, a feasibility study was supposed to be carried out in 2012 on setting up a structure for the cooperation with the civil society, which was to be followed by the setting up of the unit as such. The State Chancellery was made responsible for implementing this action.

The evaluation found that the study had not been developed and the unit responsible for the cooperation with the civil society has not been set up. In this sense, a number of meetings and debates took place but the main argument invoked by the state public authorities was the lack of funds to cover the costs.

Subsequently, after a number of rounds of meetings between the NGO Council and the State Chancellery, it was decided that a focal point (one person) from the State Chancellery be made responsible for this cooperation with the CSOs. The focal point in his job description indicated many other responsibilities and tasks in the area of transparency in decision-making and is not able to assure an efficient cooperation with the CSOs, which is confirmed by many representatives of the civil society and of the state public authorities consulted during the evaluation. His involvement implied receiving the information from the state public bodies for preparing the activity report, sending out some information to ministries about certain events and eventually organizing some of them, e.g. the working group on the draft 2% law and training of some civil servants.

The Parliament, via the Information Analytical Division, started consultations in 2013 with the Moldovan civil society. The Secretariat of the NGO Council involved active CSOs that made recommendations for improving the Cooperation Concept. ECNL also provided recommendations for enhancing the cooperation between the Parliament and the civil society. And yet, the Concept of Cooperation between the Parliament and the civil society has not been adjusted and the recommendations made have not been incorporated as provided by the PA of the CSDS 2012-2015.

Neither the study of the efficiency of the cooperation between the Parliament and the civil society, provided in the PA of the CSDS was conducted.

The Parliament periodically organized various consultations with the civil society as well as annual conferences “The Parliament and the civil society,” including the recent meeting of 27 April 2016

that reviewed the achievements of the CSDS based on the reports submitted to the Government and CSOs as well as the perspectives of cooperation between the Parliament and the civil society.

The central public authorities periodically and systematically cooperate with the CSOs in decision-making and public policy making by setting up various topical working groups, advisory meetings, debates<sup>16</sup> with the participation of the representatives of CSOs. Also, consultations take place and online publications are produced ([www.particip.gov.md](http://www.particip.gov.md)). Many representatives of the civil society consulted during the evaluation and implementation of the CSDS stated that sometimes the publication of draft policies by the authorities took place a few hours before the meetings and the public consultations, and that practically it was impossible to study them.

Each ministry has its own database of key CSOs that are consulted but the lists of the respective organizations are not published and it is not clear if they are updated. The recommendations received from the civil society as well as from various ministries are introduced into divergences tables as provided by the legal framework of transparency in decision-making and indicate: the recommendation – the author of the recommendation – the decision on accepting or not accepting the public authority and the respective arguments.

The evaluation finds that, on the one hand, in most cases, the state public authorities do not publish the divergences tables and, on the other hand, the CSOs consulted during the evaluation do not have the possibility to follow which of their recommendations have been accepted and which ones have not and why. As a result, it is not clear to what extent the opinion of the civil voice is incorporated in making policies, in other words, the public authorities consult with the civil society but do not publish their decisions. The existing legal framework does not expressly require the authorities to publish the table of divergences in addition to the other documents in policy making.

No training curricula for participation and transparency in decision making was developed but they acted based on the current regulation., i.e. state orders were placed from the State Chancellery to the Public Administration (as it happens every year) for the training only of those civil servants who are students at the Academy. Hence, the Academy of Public Administration did not hold any common trainings for the representatives of the state authorities and of the civil society but only for the students of the Academy, civil servants, who benefited from trainings in the area of transparency in decision-making and involvement of citizens in decision-making: public policy making and assessment; legal drafting and coordination; project development and management; management and strategic planning.

On the other hand, a positive example and a good practice that, in the opinion of the evaluator could be replicated by other education institutions is the joint training of the representatives of state authorities and CSOs<sup>17</sup> in a graduate training course for security and national defense specialists. The course was organized in 2014 by the Military Academy of Armed Forces “Alexandru cel Bun”.

During 2012, a number of CSOs, such as ADEPT or “Acces-info”, developed various studies on improving the normative framework on transparency in decision-making. In June 2014, the

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<sup>16</sup> E.g. Public consultations of the draft National Action Plan for implementing the Association Agreement; NPC consultations on the draft Public Administration Reform Strategy for 2014–2020; the Civil Society Forum of the Eastern Partnership; the National Health Forum; Public debates on the draft National Strategy for Agricultural and Rural Development for 2014–2020; Public consultations on the creation of the Civil Society Platform under article 442 of the Association Agreement; the Action Plan for an Open Governance for 2014-2015 (prepared only for 2014) etc.

<sup>17</sup> Promo-Lex; the Association for supporting the security and military art; Center for Analysis and Prevention of Corruption; and the NATO Information and Documentation Center.

Moldovan Parliament approved amendments to the Law no.239/2008 on Transparency in Decision-Making that aimed at remedying the gaps found in the implementation of the law and for which the NPC came with a number of proposals that were partially taken into account.

As to the creation of national innovation mechanisms for promoting the participation of CSOs in decision-making, the achievements are insignificant. Exception from this is the Ministry of Economy that set up a new platform for promoting the participation of the civil society in decision-making – the Advisory Council, made up of representatives of the private sector and NGOs (mainly of mutual benefit from the economic sector).

A counter performance is the suspension of the activity of the NPC that participated actively in policy making and monitoring. The NPC ended its mandate in March 2014 and this affected the implementation of the commitments, especially of the General Objective 1, because the main partner in implementation became inactive, by having its activities suspended. The Government during one year did not take measures to select another composition of the NPC. It is remarkable that in 2014-2015 Moldova had a politically unstable context followed by frequent Government changes and a political crisis. Still, in June 2015, the Government, through the State Chancellery, launched an unsuccessful initiative of selecting new NPC members but it failed due to an insufficient number of applications received. Since then, no other attempts have been made and, at present, there has been set up a working group for developing a number of options for recovering the mechanism for the participation of the civil society in decision-making, which is examining the possibility of creating an advisory structure similar to the NPC. It has been agreed for the working group to provide a set of recommendations on that subject by 5 July 2016.

There is no information available about the achievements under the expected result “*At the local level there are set up mechanisms that enable access to information about draft decisions, synthesis of recommendations and the participation of CSOs in decision-making.*” There is an online platform (Registry) [www.actelocale.md](http://www.actelocale.md) set up in 2011 by the E-Governance Center. Nonetheless, the Registry is not used in a sufficiently functional way and very many local public authorities do not publish their decisions on this platform. Besides, the Registry only allows publishing local acts (one way communication) and does not give the possibility for the civil society to comment or give feedback to the decisions of the local authorities.

The central state authorities, when making public policies, periodically organize various consultation events, working meetings, round tables, seminars and conferences on the topic “Social protection of the persons with disabilities” with disability organizations<sup>18</sup> that made various recommendations. There is no public information available regarding the accepted and non-accepted recommendations.

As a result of the above said, one may conclude that under this objective, some progress has been achieved in fulfilling certain commitments, and three examples of good practices: 1) A joint training course for the representatives of the state authorities and CSOs at the Military Academy of Armed Forces “Alexandru cel Bun” and 2) an Advisory Board, body for consultations in policy making, set up by the Ministry of Economy (MoE), and made up of MoE representatives, the private and associative sectors; and 3) amendments to the legislation on the activity of civic associations made on 12 June 2014 by the Moldovan Parliament that approved the amendments to the Law no.239 of

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<sup>18</sup> Union of Disabled of Moldova; Alliance of the Deaf of Moldova; Society of Blind of Moldova; Association “Motivație”; the Association for the Persons with Intellectual Disabilities “Humanitas”; the Center for Legal Assistance for the Persons with Disabilities.

2008 on transparency in decision-making. The amendments aimed at remedying the gaps discovered in the implementation of the said law.

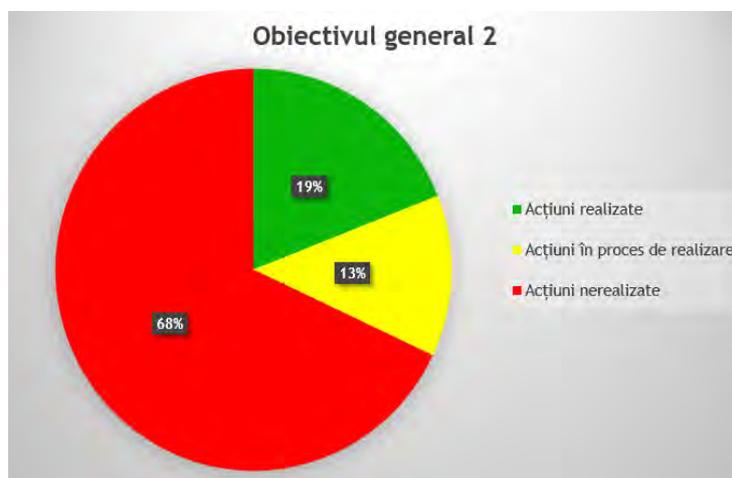
In conclusion, one may say that this general objective has a high level of achievements as compared to the other CSDS objectives, with obvious progress made by the central public authorities regarding “decision-making participation and transparency.” Not the same can be said about the achievements at the local level, the publishing of the table of divergences by the authorities or the setting up of the unit responsible for the cooperation with the civil society. These and other actions have not been honored yet and they are the subject matter of future commitments in this sense.

**General Objective 2: Promotion and strengthening of the financial sustainability of the civil society**

This objective during the implementation of the 2012-2015 CSDS proved to be the most sensitive one, which *faced the biggest resistance from the central public authorities caused by divergent opinions between them and the representatives of the civil society as well as by the lack of their political will. Therefore, the progress is slow and the achievements as a whole are under the expected level, although there are certain examples that can be assessed as good practices and should be replicated.*

The chart below shows the achievements under this general objective of the CSDS, as follows: about 19% of actions have been implemented, other 13% are ongoing, and 68% of actions have not been implemented.

*Table 2: Chart of achievements under General Objective #2 of the 2012-015 CSDS – Promotion and strengthening of the financial sustainability of the civil society*



The progress, findings and key conclusions of the evaluation under this general objective of the CSDS are described below.

An important catalyzing factor of this process that deserves noting is the fact that the development of SMEs and of social entrepreneurship accordingly was included into the priorities and commitments from the Association Agreement between EU and Moldova and in the respective road map, which served as an impetus for fulfilling this commitment.

Initially, in 2013 a working group was set up for preparing a draft law on social entrepreneurship. The association “Motivație”, member of the NGO Council, was the promoter of this initiative. After many rounds of debates and consultations with the civil society and representatives of state authorities, including the Ministry of Economy and with the help of a consultant, a draft law on social entrepreneurship was prepared that was accompanied by the comments of ECNL. The initiative was supported by FHI 360.

The draft law on social entrepreneurship was submitted to the Ministry of Economy that reviewed it and stored it, and then rejected it for several reasons. A reason mentioned by some of the constituents consulted during the evaluation was that the draft law was not cost-efficient and that its text included very many provisions from the law on small- and medium-sized enterprises.

Another reason was the insufficient knowledge about the concept of social entrepreneurship. Some constituents consulted during the evaluation (both representatives of the state authorities and CSOs) said that *“at the beginning we did not even know what social entrepreneurship meant and the resistance and dissensions appeared also due to the lack of knowledge.”* A third reason acknowledged by several persons interviewed was the lack of will of certain decision-makers who caused the delay in this process and the failure of the draft law. Apparently, it was an unsuccessful, blocked initiative.

Later, after many rounds of debates, in November 2015, this situation was unblocked<sup>19</sup> and this subject was re-launched by a newly created working group on social entrepreneurship that works under the coordination of the Minister of Economy. An important catalyzing role in this sense was played by the National Conference on Social Entrepreneurship, organized in Chisinau in October 2015 by the Eco-Razeni Association with the financial support of SOIR Moldova, FHI 360 and other donors<sup>20</sup>. This event put social entrepreneurship back on the agenda and launched the idea of a social entrepreneurship platform of the civil society that continued with the setting up of the said working group. Thus, the working group decided that the social entrepreneurship regulations be developed and integrated in the existing legal framework. About 11 normative acts<sup>21</sup> will be amended through the social entrepreneurship angle. The evaluator believes this is a positive example that can be assigned to the “good practices” when after an initiative was not approved, the mixed working group of CSOs and state authorities managed to identify a solution acceptable to all the players involved and it is about to be finalized by the end of April 2016 and submitted for endorsement to the Government and then to the Parliament.

Hence, this commitment, although not honored by the deadline specified in the PA of the CSDS, is being finalized now by the Government and is to be approved by the Parliament in order to become a law.

The provisions related to the designation of a part of the income tax (2%) of individuals and legal entities to the noncommercial organizations holders of the public benefit status proved to be very disputed during the implementation of the CSDS, the progress is slow and the expected results are being late. In this connection, a feasibility study was conducted and it looked at the Hungarian model of percentage designation and examined its feasibility for Moldova. Based on the findings, the

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<sup>19</sup> Order no.176 of 23 Nov 2015 "On training the Working Group for preparing the draft law for amending and completing legislative/normative acts on social entrepreneurship"

<sup>20</sup> National Conference on Social Entrepreneurship in Moldova, Chisinau, October 2015.

<sup>21</sup> E.g. the Law no.845-XII of 3 Jan 1992 on entrepreneurship and enterprises; Law no.837-XIII of 17 May 1996 on Civic Associations; Law no.58I-XIV of 30 July 1999 on Foundations etc.

argument was that the implementation of the percentage mechanism in Moldova is feasible with the respective recommendations.<sup>22</sup>

The concept of percentage designation has been introduced into the law, and namely, the right of only individuals to designate a part of their income tax, up to 2% to noncommercial public benefit organizations and religious groups and their component parts<sup>23</sup>. The right of legal entities to designate a part of their income was not included in the legislation and this idea is being vehemently rejected by some representatives of the state authorities, including by the Ministry of Finance.

The final evaluation finds that the 2% law was passed but the mechanism for its implementation does not exist, although the cross-sector working group set up in February 2013<sup>24</sup> was required within six months to present the mechanism for approval to the Government. The Ministry of Finance blocked the initiative for a long period of time, failing to approve the inclusion of religious organization as beneficiaries. The representatives of the Ministries of Justice and Finance, of the Tax Inspectorate and CSOs in 2013 benefited from study visits to Slovakia and Hungary that proved to be useful, as one of the representatives of the state authorities mentioned: *“I understood the 2% mechanism only when I traveled to Hungary and Slovakia and saw how it works.”*

Subsequently, a draft law was prepared to amend the Tax Code to introduce the percentage mechanism (for legal entities it was to be implemented as from 1 January 2014 and for individuals, as from 1 January 2015). The draft was consulted with the civil society but its promotion was suspended. Nor is there progress in the implementation of the commitment to enhance the donation deduction mechanism and having it extended to include individuals (Activity 2.1.2).

The evaluation found progress regarding the commitment *“Enhancing access to and civil society participation in the implementation of state policies via social contracting.”*

The NPC, with the financial support of the East-European Foundation and Pontis Foundation, hired a consultant who developed a study on the mechanism for state contracting of social services. The study made useful recommendations in the area.

The Law on Social Services was passed in 2012 and it established the accreditation of social service providers. With the support of the East-European Foundation and of the Pontis Foundation, the representatives of the Ministry of Labor, Social Protection and Family (MLSPF) and CSOs benefited from study visits to Belgium and Slovakia and a study on social contracting was conducted under the FHI 360 program with the involvement of ECNL–Budapest. The visits contributed to developing the capacities of the authorities that implement social contracting.

The mechanism for the social contracting of CSOs was developed by the working group set up under the guidance of the MLSPF and amendments were prepared to the Law on Public Procurements that includes CSOs as potential providers.

The staff of the authorities that implement social contracting and promote the good practices in social contracting has not been trained.

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<sup>22</sup> The report on Percentage designation based on Hungary’s model. Maybe this is what makes the difference in Moldova? Andrei Brighidin. Chisinau 2013. Link: [http://www.fhi360.md/docs/Desemnarea\\_procentuala\\_in\\_baza\\_modelului\\_Ungariei\\_poate\\_acesta\\_face\\_o\\_diferenta\\_in\\_R.Moldova.pdf](http://www.fhi360.md/docs/Desemnarea_procentuala_in_baza_modelului_Ungariei_poate_acesta_face_o_diferenta_in_R.Moldova.pdf)

<sup>23</sup> Law no.158/2014 on Transparency in Decision-Making

<sup>24</sup> Government Decision no.17 of 12 Feb 2013

Some nongovernmental organizations, e.g. the International Center “La Strada” (Chişinău) or the Social-Medical Assistance CASMED (Bălţi) benefit from social contracting for social services, such as a trust telephone line and social-medical assistance. Nonetheless, many NGOs do not know the legal provisions included. But the failure to establish quality standards and, respectively, the non-accreditation of social providers are the most important aspects that generate difficulties in this sense.

For the actions included under the Specific Objective “*Setting up mechanisms for having CSOs supported by the state,*” the Ministry of Finance requested an extension of the implementation period, based on the level of complexity of the action. Hence, the tax policy has not been revised to provide for VAT payment incentives for the CSOs having the public benefit status.

The commitment “*Introducing additional institutional mechanisms for supporting the CSOs (specialized funds and/or the National Fund for supporting the civil society)*” was not brought in the discussions between the state authorities and the CSOs, nor was the feasibility study conducted. Some CSO representatives consulted during the evaluation think that it was a mistake of the civil society that it insisted too much on the 2% mechanism and overlooked this commitment. The evaluator supports this opinion.

In 2014,<sup>25</sup> the national accounting and reporting standards for CSO activities were adjusted in the context of the requirement for mandatory application of the new accounting standards and new General Chart of Accounts as from 1 Jan 2015. The national accounting and reporting standards reflect the work of CSOs and the methodological guidelines developed are useful.

Activity 2.4.2. “*Introducing a grace period for CSOs regarding the compliance with the accounting standards without being imposed fines or penalties for previous errors*” was not carried out. The donation deduction mechanism was included into art 36 of the Tax Code of Moldova by passing of the law no.71 of 12 April 2015 that reduces the ratio of donations of individuals and legal entities from 10% to 2%. The Ministry of Finance issued an informative note on 14 Jan 2016 that explains these aspects.

FHI 360 held a number of relevant trainings for the NGOs funded by USAID on this topic.

The actions for the promotion of the Code of Ethics and Conduct of Noncommercial Organizations, setting up of an Ethics Board in the National NGO Council, carrying out of a national information campaign for the Code of Ethics and Conduct of Noncommercial Organizations, or the examination of cases and complaints by the Ethics Board have not been carried out.

In view of enhancing the CSO accountability and transparency, a working group was set up at the Ministry of Justice to amend the legislation on assuring CSO transparency and accountability. Meetings and consultations were held and then in 2014 the Government passed amendments but they were not approved by the Parliament.

*In conclusion, the progress made under this objective is modest. Although certain actions have taken place according to the Action Plan, most of the commitments have not been fulfilled, they are either implemented with a delay and are now being implemented, or they were never started.*

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<sup>25</sup> By order of the Ministry of Finance no.188/2014

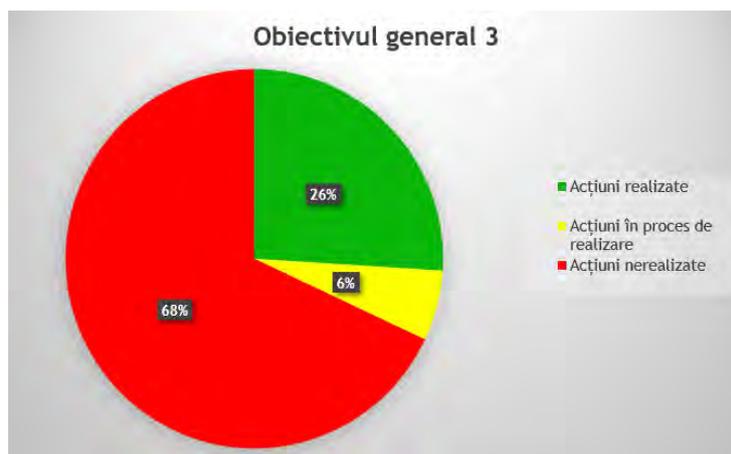
**General objective 3: Developing active civic spirit and volunteering.**

The state authorities assigned responsible for this objective were the MYS, Ministry of Education (ME), and the MLSPF. The Volunteering Coalition was designated the main partner for the implementation of the CSDS.

The evaluation finds that this objective of the 2012-2015 CSDS had a modest level of achievement but there is clear progress in place regarding the regulation and recognition of volunteering. Although there have been dissensions, the cooperation between the MYS and the Secretariat of the Volunteering Coalition is an example of integration of volunteering issues into the legal regulations and that can be assigned to the good practices and replicated in the future. However, there are many actions in the AP that have not been implemented. It is worth noting that this objective has the highest number of detailed commitments assumed.

Below is the chart of achievements under this general objective of the CSDS that shows that about 26% of actions have been implemented, other 6% of actions are ongoing, and 68% of actions have not been implemented i.e. either were abandoned or were never started.

*Table 3: Chart of achievements of General Objective #3 of the 2012-2015 CSDS  
– Developing the active civic spirit and volunteering*



Further on, there is a description and review of the corresponding results and weaknesses under this Objective. The legal framework on volunteering has been amended constantly during the implementation of the CSDS and, as a whole, this can be perceived as a success story. In particular, the Law on Volunteering<sup>26</sup> and the regulations on enforcing the law on Volunteering have been passed e.g. the Regulation on the Operation of the Commission of Certification and Control on the fulfillment of the minimum quality standards by the host institutions.<sup>27</sup> Important regulations were introduced into the legislation regarding acknowledging volunteer work as length of service, which is an important incentive for promoting volunteering.

Also, the regulations on the accreditation of host organizations for volunteering, sample certificates for the host organizations and ID templates for volunteers were developed. The initiatives were

<sup>26</sup> The Law on Volunteering no.121 was approved on 18 June 2010

<sup>27</sup> ORDER of MYS No.525 of 15 July 2014

supported by USAID. Circa 60 CSOs are already accredited, having obtained the status of a volunteering host organization.

After a number of common efforts made by the Ministry of Foreign Affairs and European Integration and by some CSOs, such as AISEC, CNTM, TDV for adjusting the related normative framework in order to set up mechanisms for enabling foreign citizens to provide volunteer work. In this connection, in 2013 the Government approved a draft law on the foreigners required to have a visa and the foreigners exempted from the requirement of having a visa when crossing the state border of Moldova. But this draft law was not examined by the Parliament and did not become effective. The adjustment of the normative framework on the participation of students in European and international volunteering activities and the implementation of volunteering promotion activities among the students did not take place.

The development of mechanisms and statistical forms for reporting on volunteering work for the host institutions did not take place, although progress has been made in the volunteering statistics. The International Labor Organization made efforts to integrate the volunteering statistics in the statistical system of Moldova and to enable the National Bureau of Statistics (NBS). Thus, the NBS has accumulated expertise in the area of measuring volunteer work and conducted the 'Volunteer Work Survey'. Still, the NBS has not included yet into the existing quarterly reports columns about the volunteer work of ten host institutions.<sup>28</sup>

Setting up a structure for developing volunteering and planning increasing their number did not take place due to the fact that the number of host organizations is still insignificant (about 60). In addition, TDV had an attempt to set up a Coordinators School but this was not possible due to lack of funds. The creation of the National Volunteer Center and of regional centers did not take place for the above-mentioned reasons.

Integrating volunteering subjects into the educational system, as it was provided in the CSDS, did not take place, although the Secretariat of the Volunteering Coalition had a number of initiatives in this sense that were not supported. Certifying the training of volunteer coordinators in the national Volunteer Coordinators School is not feasible provided that the school was not created due to the lack of funds.

The National Volunteer Platform ([www.voluntar.md](http://www.voluntar.md)) was created by the Secretariat of the Volunteer Coalition/TDV with the support of the MYS and of the Polish organizations FERSO and RITA after a number of failed attempts of getting financial support.<sup>29</sup> The platform was conceived to promote volunteering in Moldova but is not regularly updated and has not been finalized, many links do not open. It is little likely that it will be connected to other databases of the National Employment Agency and of the MLSPF, as the platform authors supposed. The actions in this sense are not monitored. Nor were there media campaigns organized in view of involving volunteers in various areas.

Adjustment of legal mechanisms and of the normative framework on the exemption of volunteers from the payment of the income tax and reimbursement of costs related to volunteering did not take place, although the Volunteering Coalition made substantial efforts in this sense. Thus, the Coalition prepared a draft Government Decision for completing the Regulation on the delegation of staff of Moldovan entities and on including Moldovan volunteers in addition to the staff. The Ministry of Finance and the Tax Inspectorate were reluctant to do this. The amendments and recommendations

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<sup>28</sup> According to the provisions of the Regulation on Enforcing the Law on Volunteering no.121 of 18 June 2010

<sup>29</sup> TDV unsuccessfully applied to the US and Czech Embassies, NED and the World Bank

prepared by the Secretariat of the Coalition oscillate between the MF and the MYS and have remained unapproved.

The Volunteers Code of Ethics has been developed but has not been approved yet. The drafting of the Code of Good Practices in Volunteering was postponed by the MYS that invoked that the regulations in the area of volunteering became excessive and bureaucratic.

This concern was also expressed by about 30% of CSOs representatives and by the state who think that significant progress has been made in volunteering regulations while overregulating volunteering would create bureaucratic impediments and not incentives for developing volunteering.

The arguments invoked in this sense are that some volunteers e.g. the elderly usually do not need legal incentives for volunteer actions because the reasons for their getting involved are others. While, the youth would truly need sometimes such incentives e.g. to have volunteer work recognized as length as service.

The final evaluation of the CSDS implementation confirms that state public authorities promote and support volunteering and the benefits of this activity. In this sense, there are periodically organized public events for promotion of volunteering, such as the Volunteers Festival, the National Volunteers Week, National Conferences on Volunteering etc. The costs of the initiatives were covered by the MYS, UNFPA, and USAID via FHI 360. However, the lack of a state authority that would manage the development and implementation of volunteering policies was noted by the constituents as one of the factors that affected the development of volunteering in Moldova. The cooperation with the MYS only partly covers this aspect, especially in case of teenagers and youth, while a significant number of volunteers are from the elderly, with the respective policies being managed by the Ministry of Labor, Social Protection and Family. This duality has created confusion in regulating volunteering.

Other deficiencies are related to the studies regarding the input of volunteering in fighting and reducing poverty or in promoting public policies in the area of volunteering, which were not conducted.

Tangible achievements were registered in civic education, supported by the Ministry of Education through the provision of continuous training to teachers. The school curriculum was completed with additional hours for education on gender equality, tolerance, citizen-government relation etc. while the syllabus of the Bălți University included subjects on volunteering for the youth and social work. Still, the curriculum of civic education was not assessed from the prospect of transparency in decision-making and access to information. The study on compliance of school curricula with the principles of democratic participation was not conducted.

Other unimplemented actions are related to the promotion of the involvement of the media in the facilitation of transparency in decision-making and especially the training of journalists in the area of transparency in decision-making; a study on the timeliness of publication by the media of the information about starting consultations on the draft decisions; and promotion of the practice of publication in the media of the information on transparency in decision-making.

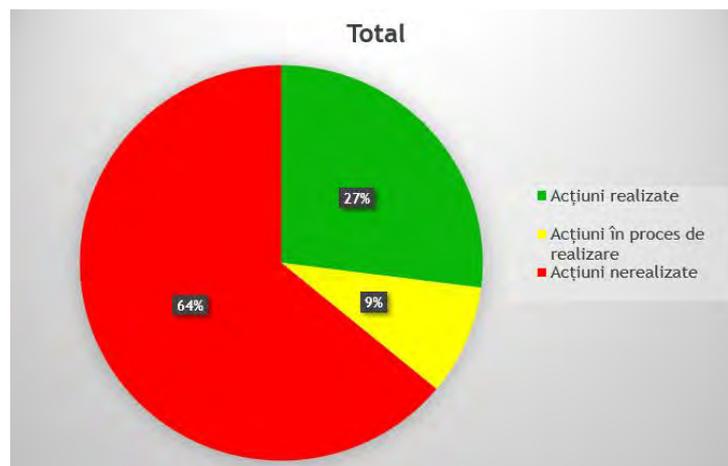
The issues related to establishing a system of acknowledgment and promotion of non-formal education and especially conducting a study on the international practices of recognition of non-formal education; creation of the respective legal framework – were not implemented.

It is important to note that there is a considerable number of elderly volunteers in Moldova<sup>30</sup> who provide various social-medical services on a volunteer basis, being associated in various community CSOs in the entire territory of Moldova. A part of them are found in the network of HelpAge International-Moldova<sup>31</sup> and/or in the Active Aging Platform.<sup>32</sup> The evaluation of the implementation of the CSDS found that the amendments to volunteer regulations under Pillar 3 are less relevant for this category of the population and of volunteers who usually have time and are open to get involved in the active life of their community. In fact, the amendments made to the legislation are not perceived by the elderly as being an important incentive. On the other hand, those considered as giving an impetus to volunteering among the elderly are if volunteer work in some host organizations would provide for an increase (even a minor one) to their pensions. These issues have not been included into the current legal framework on volunteer regulations. The evaluator thinks this is a gap to be tackled in the future.

Based on the findings on the achievement of the general objectives of the 2012-2015 CSDS and AP, one may conclude that the level of implementation of the CSDS as a whole is of about 27% actions implemented, 9% being implemented (ongoing), and 64% of the actions have not been implemented.

The table below shows the findings of the final evaluation on the results of the implementation of the 2012-2015 CSDS, as a whole.

*Table 4: Chart of achievements of the 2012-2015 CSDS*



## Cooperation and partnerships

The partnership and cooperation between CSOs and the executive public authorities represent a mixed picture. During the implementation of the CSDS there can be identified different forms of effective cooperation within public consultations and working groups e.g. the Working Group for drafting the legal framework on social entrepreneurship, coordinated by the Ministry of Economy; the Volunteering Coalition and MYS (in some) etc. This has contributed to the joint development of

<sup>30</sup> There is no official accurate statistics about the number of volunteers among the elderly in Moldova

<sup>31</sup> According to the reports of HelpAge International (HAI) – Moldova, the network HAI-Moldova brings together 14 organizations of the elderly from 10 districts with a total number of about 330 volunteers.

<sup>32</sup> The platform was created in December 2015 with the support of the UNFPA and brings together 16 organizations from the area.

various public policy projects e.g. regulations, amendments to legal acts, mechanisms of implementation of laws etc.

Another form of cooperation was the holding of various common public events (or support with their implementation) of state public authorities and CSOs e.g. national festivals or other types of activities for the promotion of volunteering.

It is worth noting that the state public authorities and CSOs often had the occasion to benefit from simultaneous support in strengthening capacities e.g. during study visits (to Belgium, Slovakia, Hungary etc.) organized for the representatives of the civil society and state public authorities.

The evaluation also finds cases when the cooperation between CSOs and the public authorities (ministries and the State Chancellery) was less efficient and the initiatives got stuck e.g. the mechanism for enforcing the 2% law, the code on good practices in volunteering etc. Both the state authorities and CSOs expressed their cooperation dissatisfaction accusing each other of insufficient involvement in certain initiatives of examination of draft normative acts.<sup>33</sup>

In the evaluator's opinion, the cooperation between the Parliament and the civil society was satisfactory, taking into account the periodicity of monitoring events and the debates in the implementation of the CSDS, public consultations organized by the Parliament and the involvement of CSOs in them.

In the evaluator's opinion, the State Chancellery was insufficiently proactive in coordinating the involvement of the key players in impelling the implementation of initiatives while CSOs not every time reacted to the public consultations initiated by the State Chancellery and did not make a consolidated lobbying in view of implementing the AP activities. Some CSDS actions did not enjoy the attention either of the state authorities or of the CSOs e.g. the actions related to the non-formal education, involvement of the media in the process of facilitation of transparency in decision-making, creation of a specialized fund for supporting the civil society etc.

### 3.3 CSDS Efficiency

The cost-effectiveness evaluation of the CSDS is problematic because there are no relevant data available regarding the funds allocated and consumed during the implementation of the CSDS. The costs planned for implementing the CSDS have been only partially estimated,<sup>34</sup> with 34 actions out of 88, with the total amount of MDL 4,190,000. This amount was fully assigned to "other sources of funding", without any commitments from the state budget (that section reads MDL "0").

The table shows the partial costs planned per each general objective of the AP of the 2012-2015 CSDS.

General objective	Estimative partial budget, MDL	Financially estimate actions	Total actions planned
<i>1. Strengthening the framework of participation of the civil society in developing and monitoring the implementation of public policies.</i>	1.165.000	10	22
<i>2. Promotion and strengthening of the financial sustainability of the civil society.</i>	965.000	19	32

<sup>33</sup> See the reports of the State Chancery/Government and the reports of the NGO Council

<sup>34</sup> See the AP of the CSDS for 2012-2015

3. <i>Developing the active civic spirit and volunteering.</i>	2.060.000	15	34
Total	4.190.000	34	88

Due to the lack of information, the actual budget consumed in the implementation of the CSDS cannot be established; hence, the ratio of resources allocated versus outcomes achieved, either as a whole or per each general objective, cannot be reviewed.

The reasons for this vary. First of all, no monitoring of the resources allocated was conducted and none of the bodies coordinating the implementation of the CSDS has such information, in fact, there is no coordination body in place. Secondly, some of the organizations that provided financial support in the implementation of the CSDS do not have their resources structured by its general objectives. Third, some of the funds were allocated from the state budget e.g. through the small grants program managed by the MYS.

As a whole, the evaluation finds that the CSDS actions were supported by USAID via FHI 360; the Swedish Government/SIDA via the East-European Foundation, DANIDA, the MYS (the small grants program) from the state budget sources, the UNFPA, Pontis Foundation, FERSON and RITA organization of Poland. The National NGO Council's report<sup>35</sup> specifies: *"In organizing the events of the National Volunteering Week "Come join the volunteers' squad!" (Oct 2015) 95 sponsors and donors got involved, most of whom are individuals."* There are no data available about the amount of the support of the donors and sponsors and so, as it was noted above, it is impossible to evaluate the cost-effectiveness of the CSDS.

Another aspect of the efficiency of implementation of the CSDS is the implementation of the actions assumed within the deadlines established. The findings of the evaluation show that 27% of the actions of the AP of the CSDS were implemented within the timeframe established, 9% of actions are implemented with a delay, and 64% of actions were either suspended or were never started.

Another conclusion is that circa 36 of actions or 41% of the actions that have been implemented required funds that were not available, so this issue must be taken into account when drafting a new strategy.

The findings of the final evaluation about the weaknesses in the planning, coordination and reporting of the resource management, as mentioned above in this section, can and should constitute corrections for subsequent commitments.

### 3.4 Sustainability of achievements

The sustainability of the outcomes achieved by the 2012-2015 CSDS can and will be reviewed from the prospect of their sustainability at the level of policies, institutional sustainability and financial sustainability. Another separate aspect that will be examined is the ownership of the commitments made and of the outcomes achieved.

As to the sustainability of the achievements at the level of public policies, this is a consistent one because the CSDS provides for multiple interventions at the level of public policies. The results of the interventions at the level of public policies are found in all the three components/general objectives of the CSDS, materialized through amendments made to the existing legal framework e.g. the Law on Transparency in Decision-Making, the Law on Volunteering etc. and the mechanisms (developed or being finalized) for implementing various laws, e.g. the 2% Law, Volunteer's Law etc. The sustainability of such interventions and results is assured by having them

<sup>35</sup> Reporting period May 2014- April 2015

integrated in the Moldovan legal framework and, with this, the mandatory character of their applicability.

As to the institutionalization of the outcomes achieved, the evaluation finds that they are insignificant, one of the exceptions being the setting up of the Commission for Certifying the status of volunteering host organization (Pillar 3).

Most of the actions set out in the CSDS that contained elements of institutionalization have not been implemented e.g. the setting up of the unit responsible for the cooperation with the civil society (Pillar 1); setting up of an Ethics Board within the National NGO Council (Pillar 2); setting up of a Specialized Fund for supporting the Civil Society (Pillar 2); setting up of an Independent National Volunteer Center and of National Volunteer Coordinators School (Pillar 3); developing three regional volunteer centers (Pillar 3).

Hence, the institutionalization of structures relevant for the development of the civil society represents one of the weaknesses of the CSDS implementation.

The financial sustainability of the results of the implementation of the CSDS greatly depend on their institutionalization and ownership issues. If the institutionalization of the results of the CSDS implementation is insignificant, the issues of their financial sustainability become irrelevant and in the best case, minor.

The CSDS was developed in a participatory manner by consulting the civil society and the Government, and the latter was made responsible for its implementation.

The Government's Action Plan (2012-2015) was adopted by the Government Decision of 7 May 2012 i.e. prior to the adoption of the CSDS 2012-2015 and contains 3 objectives: 1) Creation of a legal framework adequate for developing the civil society as mediator of the citizens' interest and partner of the public authorities in the public policies; 2) Developing the institutional framework for an efficient cooperation between the public authorities and the civil society, and 3) Creation of conditions for assuring the financial sustainability of nongovernmental organizations. A fast analysis shows that, for the most part, the CSDS objectives match the ones from the Government AP, if the first two objectives merged and became Pillar 1, Objective 3 would become second and "Volunteering" would be completed. The PA contains six actions.

1. *Adjust the legal framework regulating the activities of noncommercial organizations to the international norms.*
2. *Institutionalize the participation of CSOs in the formulation, implementation, monitoring and evaluation of public policies, including by setting up clear and efficient mechanisms of consultation and participation in decision-making.*
3. *Complete the legal framework regulating the cooperation between the state and the civil society.*
4. *Reform the legal framework on philanthropy, sponsorship and social entrepreneurship in view of assuring the sustainability of NGOs and the increase in the level of their independence.*
5. *Develop the legal framework necessary for social orders for NGOs in view of producing community interest services and activities.*
6. *Set up an efficient mechanism for the implementation of the national CSDS.*

Practically, all these commitments we found in the CSDS for 2012-2015; however, as it was said, they did not increase the level of implementation of the CSDS, nor did their sustainability prospects excel.

The evaluation found certain conceptual disparities between the civil society players and the governmental structures regarding the responsibility for its implementation and the financial commitments. Thus, about 60% of the representatives of the governmental structures interviewed perceive the CSDS as a product of the civil society and therefore the civil society should be responsible for its implementation and for mobilizing the resources, while CSOs say it is the responsibility of the state to support and to invest in developing the civil society. Such disparities were evident and visible, and were felt during the CSDS development<sup>36</sup> and CSDS implementation,<sup>37</sup> and affected the CSDS ownership and achievements. Regarding ownership, the evaluation found an ambiguous situation. On the one hand, both the state public authorities and CSOs (both on a righteous basis) assume the merits for the outcomes achieved. On the other hand, both invoke the insufficient involvement of the other as one of the reasons for the failure to fulfill the other commitments.

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<sup>36</sup> See the request for the reendorsement of the 2012-2015CSDS and of the AP issued by the State Chancery

<sup>37</sup> See the monitoring and progress reports of the CSOs and of the State Chancery

## Part 4: LESSONS LEARNED and GOOD PRACTICES

The development and implementation of any project, program or strategy represents an excellent opportunity to learn certain lessons from what did not work and to note the good practices that worked and could be replicated in the future.

In this sense, the development and implementation of the CSDS for 2012-2015 requires the need to learn some lessons. First, when making commitments account must be taken of the implementation capacity and the human and financial resources available, at least of the financial commitments, to be specified later. Ambitious commitments are welcome but they must be realistic. In drafting the 2012-2015 CSDS and AP, it was (more or less) clear that state authorities would not make certain financial commitments to support the implementation of the CSDS. As argument can serve the fact that the CSDS text mentioned that the funds would come from various sources, including from the state budget, and the AP, in column “budgetary funding sources” does not show any figure and does not mention anything about when the allocation of resources from the state budget would take place. It was clear from the beginning that the expectations were that such resources would have to come from external sources, although as noted above, some resources had been allocated from the MYS and they represent a good practice worth replicating.

As a representative of the state executive authorities, consulted during the evaluation, mentioned: “...the intention was for us to approve your commitments and to help you implement them while you find the funds and go ahead and implement them.” So, from the beginning it was little likely for many of the actions planned to be honored due to the insufficient financial resources and involvement, especially of state public authorities.

Secondly, it is important to realize that the fulfillment of some complex cross-sector commitments, such as the civil society development ones, imply a more consistent involvement from the state public authorities, CSOs and donors community (of various rank and level) that interacts with the civil society. The evaluator thinks that each of such components could do more and involve more actively in implementing and supporting the initiatives derived from the CSDS. The state authorities and the CSOs could have sensitized and involve more actively the donors community active in Moldova that proved to be insufficiently informed and involved in supporting the development of the civil society, except for USAID, SIDA and some other donors. It was the mission of the state authorities and CSOs to prove commitment, consistency, perseverance, tangible achievements and to request more insistently support from the donors community. It is true that some CSOs tried on their own to mobilize some resources but they often failed and became disappointed, some of them even withdrew from the implementation of the CSDS. It is remarkable that a considerable input came from the projects coordinated by FHI 360 and EEF that can be considered champions. But even so, their support was insufficient because the implementation of the CSDS require a more active involvement of the donors’ community that could have supported various actions approved by the Parliament and the results would have been probably been bigger and more tangible.

The evaluation found that many of the funding organizations that during the years have supported numerous initiatives of CSOs, including their enabling, do not know the content and priorities of the CSDS and when asked by the evaluator to share their opinions about the implementation of the CSDS they admitted not having been informed. Such a finding is a drawback in the right of the authors of the CSDS implementation and to some extent reflects the effects of the insufficient promotion.

Third, the common vision, political will, availability of involvement, commitment and ownership should not be underestimated because during the implementation of the CSDS, such elements or, better to say, their lack substantially affected the performance. The disagreements and conditioning, mutual allegations of noninvolvement or insufficient involvement, invocation of various excuses and/or contexts to veil the insufficient commitment and the poor results only affect the achievements, reduce the credibility and the ownership. As a result, no one has to win, everyone only has to lose, it becomes a “lose-lose” situation. Regarding the political will of the public authorities, shortcomings were found here because some commitments, especially the ones from Pillar 2 have been affected and could be implemented if there had been will. The Parliament could have had a more active involvement by impelling the implementation of the CSDS and by budgeting the necessary resources.

Fourth, half measures usually do not work and do not generate plausible and sustainable results. E.g. the failure to create the unit responsible for the cooperation with the civil society and the attempt to solve the problem with a focal point that has tens of other tasks in addition to the cooperation with the civil society proved to be unsuccessful and did not work. This is one of the reasons why the cooperation between the civil society and the state executive public authorities was adverse as a whole, with some exceptions that can serve as good practices. (See below).

Fifth, the CSDS authors (CSOs and state public authorities) became convinced (if it still was the case) that the biggest debates and resistance, on the one hand, and the fewest actions implemented, on the other hand, happened in Pillar 2 (financial sustainability). Some actions started progressing, after study visits to Hungary and Slovakia etc. that strengthened the capacities both of the state authorities and of the CSOs. Although this pillar has many backlogs yet to deal with, the effects of the study visits cannot be neglected and including certain actions with high likelihood of increased resistance should be duplicated with capacity strengthening.

Finally, a sixth lesson could be the fact that in order to integrate the CSDS achievements at the local level, it is necessary for the local CSOs and local public authorities to be informed and involved in the implementation of the commitments and promotion of CSDS achievements and benefits. Or, this has not happened and so, there was no way for the expected results to be achieved under the corresponding commitments.

As to the good practices identified during the final evaluation, the implementation of the CSDS stressed several good practices that would require replication because they proved to be productive, such as amendments made to some normative acts e.g. to the law on transparency in decision-making or accounting and financial reporting issues.

One of the good practices is the redressing of the approach in the Social Entrepreneurship Subcomponent, where initially the draft law was rejected and seemed a blocked initiative but after a number of rounds of debates in 2015 the situation was unblocked and the newly created Working Group on Social Entrepreneurship that works under the coordination of the Ministry of Economy re-launched the subject. This is a positive example that can be attributed to the “good practices” when after the failure to approve an initiative, the mixed working group of CSOs and state authorities managed to identify a solution acceptable to all the stakeholders and is about to be completed and submitted to the Government for endorsement and further submission to the Parliament.

Another example that can be attributed to good practices is the productive cooperation between the Volunteering Coalition Secretariat and the MYS, and the amending of the legal framework on volunteering, recognizing volunteer work as length of service, as well as the inclusion of other



provisions. The development of accreditation regulations, setting up of the respective commission and the proper accreditation of about 60 CSOs as host institutions as well as the development of IDs for volunteers is another argument in favor of perceiving this situation as “good practices” worth replicating. Such achievements are worth classifying as success stories.

## Part 5: RECOMMENDATIONS

This final section of the report presents the recommendations of the final evaluation of the CSDS implementation as a result of the evaluator's findings and conclusions. The recommendations of the evaluation are shown in the chart below that presents the general framework. They are set out by order of importance.

### 5.1 General framework of recommendations

REC	Recommendations of the final evaluation
<i>Strategic recommendations</i>	
Rec. 01	<i>Develop a new Civil Society Development Strategy for 2017-2020</i>
Rec. 02	<i>Keep in the CSDS 2017-2020 the priority areas of the CSDS 2012-2015.</i>
Rec. 03	<i>Enhance accountability for the implementation of the CSDS.</i>
<i>Recommendations for the general objectives</i>	
Rec. 04	<i>Reformulate and adjust the general objective #1 of the CSDS.</i>
Rec. 05	<i>Strengthen the efforts on the general objective #2 of the CSDS.</i>
Rec.06	<i>Gradually withdraw from the General Objective #3 and refocus efforts on the general objectives #1 and #2 of the CSDS.</i>
<i>Conceptual recommendations</i>	
Rec. 07	<i>Revitalize the National Participation Council.</i>
Rec.08	<i>Use findings, conclusions, and eventually the recommendations of various studies in developing and monitoring the implementation of the CSDS.</i>
Rec.09	<i>Evaluate CSDS implementation costs and budget them.</i>
Rec.10	<i>Map the active NGOs and potential donors and involve them in supporting the implementation of the CSDS.</i>
Rec.11	<i>Make grant provision to NGOs transparent.</i>
Rec.12	<i>Promote the CSDS more actively, including at the local level and involve more actively the local public authorities and the local NGOs.</i>
Rec.13	<i>Create and interconnect a number of dialog platforms between the civil society and the state public authorities.</i>
Rec.14	<i>Translate the CSDS, including the AP, and its monitoring and evaluation reports to Russian.</i>
<i>Operational recommendations</i>	
Rec. 15	<i>Develop reporting templates and report against updated progress indicators.</i>
Rec. 16	<i>Carry out an interim evaluation of the CSDS.</i>

### 5.2 Detailed recommendations

The recommendations of the final evaluation are explained below and they could contribute to enhancing the implementation of the further commitments of civil society development in Moldova. The order of presentation of recommendations does not indicate to their importance but rather serves as a logical framework for expressing and assimilating them.

#### 5.2.1 Strategic recommendations

<b>Rec. 01</b>	<i>Develop a new Civil Society Development Strategy for 2017-2020</i>
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Although this recommendation seems to be obvious and natural, during the evaluation, several representatives of the state authorities and of CSOs suggested that in fact it was not necessary to

develop a new CSDS but to extend the timeframe of the 2012-2015 CSDS and to deal with the existing backlogs under the commitments made in 2012. The evaluator thinks that it is not enough simply to extend the timeframe and automatically transform the backlogs into a new Action Plan. It is recommended that CSOs and state public authorities reflect on the achievements, good practices, shortcomings and the lessons to be learned from the implementation of the 2012-2015 CSDS. Additionally, the pending actions (that were not started or that were started but then abandoned) should again be reviewed, updated and then reassumed.

Also, certain adjustments are necessary regarding the manner of tackling commitments, involving the players, promotion, monitoring and reporting.<sup>38</sup> That is, there are many aspects that require adjustment and if the players decide to act as a result, there some recommendations below that could be useful in this sense.

**Rec. 02** *Keep in the CSDS 2017-2020 the priority areas of the CSDS 2012-2015*

The evaluator thinks that is necessary to keep the priority areas of the 2012-2015 CSDS and integrate them into a new strategy paper. This recommendation is the more so obvious since about 73% of commitments have not been implemented. The general objectives established proved to be truly relevant for the development of the civil society and therefore it is necessary to keep the current objectives in the new strategy, with some adjustments to the activities and actions under all the objectives, and eventually reformulate them.

A generally valid recommendation for the future CSDS is reduce the number of actions and activities, have a deeper approach and a better focus on the primary aspects of the general objectives. In other words, reducing and prioritizing the initiatives and focusing on their full implementation.

A more consistent emphasis is needed on the General Objective #2 (financial sustainability) both due to its importance for the sustainability of the civil society and since this extremely important objective has the most modest and more resistant achievements.

Also, it is recommended to have a gradual *exit strategy* from the General Objective #3. See below some recommendations per each general objective.

**Rec. 03** *Enhance accountability for the implementation of the CSDS.*

This recommendation is important because in the implementation of the 2012-2015 CSDS one of the reasons invoked both by the CSOs and the state authorities was the insufficient accountability assumed by the players involved and in fact the passing of the responsibility by the state authorities to CSOs and vice versa. The evaluator thinks that the annual meetings under the aegis of the Moldovan Parliament and the reporting on the CSDS achievements did not significantly contribute to making the decision-makers more accountable for respecting the commitments made. Therefore, it is necessary to have other accountability strategies that would be more efficient and more rigorous.

The allocation of resources from the state budget would be one of them because it would enhance the accountability of recipients and of the players, also a more rigorous monitoring/based on CSDS

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<sup>38</sup> These may take place during the first meetings of the working groups set up of the representatives of the public authorities and CSOs.

implementation results, requesting explanations with arguments from the responsible bodies, a more active involvement of the State Chancellery etc. could represent solutions for making the players involved more accountable.

The state public authorities (both the Moldovan Parliament and the Government) and the CSOs could develop a more consistent set of measures in this sense.

### 5.2.2. Recommendations for general objectives

**Rec. 04** *Reformulate and adjust the general objective #1 of the CSDS.*

It is recommendable to reformulate the General Objective/Pillar #1 into “*Participation of the civil society in decision-making and in monitoring the implementation of public policies.*”

This implies not only changing the name but (especially) the content. It is important that this Pillar include not only the commitments of participation of the civil society in decision-making but equally in monitoring the implementation of the public policies developed in various areas e.g. enforcement of the legal framework that affects the key elements of the civil society, the use of public funds etc.

In this connection, it is recommendable to have cooperation between the Division for Policy Analysis, Monitoring and Evaluation (DAMEP) and CSOs and common trainings on result-based monitoring.

It is important to set up the unit of cooperation with the civil society that would be funded from the state budget and would coordinate the implementation of the CSDS. It is also important that the unit monitor the implementation of the CSDS and serves as liaison between the state public authorities and the civil society. The European experience of similar units described by the ECNL and studied by the public authorities and CSOs during the study visits should be applied.

The other actions unimplemented from this Objective, reflected in the AP, are to be debated upon in the working group and if their relevance is reasserted, they will be reassumed. It is important that they are realistic from the point of view of human resources, time and likelihood of mobilization of financial resources (if necessary).

**Rec. 05** *Strengthen the efforts on the general objective #2 of the CSDS.*

As mentioned in the evaluation report, this general objective involved the biggest and most sensitive disputes, and also generated the most modest achievements. At the same time, the elements of this objective are of major importance for strengthening and securing the development and sustainability of the civil society, which represents the ‘actual face of things’.

The findings of the final evaluation show that certain aspects of this section never came to be discussed by the representatives of the state authorities and of the civil society.

Hence, it is necessary that the representatives of the state authorities and of the civil society continue the efforts of implementation of the initiatives from the development process e.g. the mechanism for implementing the 2% law, the regulation on the social entrepreneurship and start implementing the actions that were assumed but never started.

Of course, as said above, this should be preceded by a repeated review of the performances and backlogs as well as of the reasons for them.

**Rec. 06**

*Gradually withdraw from the General Objective #3 and refocus efforts on the general objectives #1 and #2 of the CSDS.*

During the implementation of the 2012-2015 CSDS, under this objective, important achievements were obtained related to the integration and regulation of volunteering in Moldova, which was presented by the evaluator as a “thin success story,” given the amendments made, the institutionalization of a specialized accreditation body and the accreditation of host organizations, although as in the case of the previous general objectives, many actions have remained unimplemented/unstarted. The gradual exit of Objective #3 does not imply abandoning it. The prioritization and implementation of some actions lagging behind that are further relevant as well as including incentives to promote volunteering among the elderly e.g. recognizing volunteer work as length of service in calculating any increases, even minor, to their pensions.

The monitoring of the application of the legal framework on volunteering would represent a necessary action that would be compiled with the provisions of the General objective #1 on the monitoring of public policies.

The implementation of the other volunteering initiatives could represent the subject-matter of the Strategic Plan of the Volunteering Coalition and could be supported also by other players additionally to the existing ones e.g. the international organizations Active Aging Platform, the network of HelpAge International etc.

### 5.2.3 Conceptual recommendations

**Rec. ss07**

*Revitalize the National Participation Council.*

It is important for the Government to decide on the National Participation Council. In the evaluator’s view, it is necessary to revise the procedure and the conditions for its creation and functioning. Also, based on the above recommendations, it is necessary to restructure and rename the NPC into NPMC (National Participation and Monitoring Council).

Thus, the NPMC would not only play a consulting role in developing public policies but would also get involved in monitoring them, would present and debate on the monitoring reports and make further recommendations, would eventually take advocacy actions.

The NPC inactivity also affects the implementation of some other international commitments e.g. those related to the Open Governance Partnership (the Moldovan Government did not prepare the 2015-2016 AP mostly due to the lack of the NPC).

**Rec. 08**

*Use findings, conclusions, and eventually the recommendations of various studies in developing and monitoring the implementation of the CSDS.*

This recommendation is related to the use of findings, conclusions and recommendations made to different players, regardless of whether such studies or research had been done prior to the development of the CSDS or during its implementation. For this, it is important that the CSOs and the state public authorities are responsive and flexible.

Such a relevant study could be the CSOs Sustainability Index<sup>39</sup> that examines the general favorable environment for the Moldovan civil society, with emphasis on the legislative framework of CSOs, organizational capacity, financial viability, advocacy, service provision, infrastructure and public image.

The Index supplies important consolidated findings and conclusions in the above-mentioned areas, which represents a vaster range than the subjects set out in the CSDS. However, there are two areas, such as the legislative framework of CSOs and financial viability that are found in both strategy papers and this information from the Index could be useful both in developing and in monitoring the implementation of the CSDS because it reflects the trends and initiatives that take place.

### *The Moldovan CSO Sustainability Index*

#### *Rec. 09 Evaluate CSDS implementation costs and budget them*

This recommendation is valid for several reasons: for evaluating the necessary resources to be mobilized, for identifying the potential sources of funding, the donors, and for estimating the feasibility of the commitments analyzed for being included into the CSDS text. To note that some initiatives of the AP of the 2012-2015 CSDS include a cost estimation and others do not (see the Efficiency section of the report).

It is also important that the CSDS implementation costs are supported by a respective budget, from the state financial resources that would cover at least partially the estimated costs, with the other funds provided from external funding sources.

#### *Rec. 10 Map active NGOs and potential donors and involve them in supporting the implementation of the CSDS.*

As it has been mentioned in the evaluation report, in the evaluator's view, the donors community could have supported the implementation of the 2012-2015 CSDS more actively. In this connection, it is recommendable to have a mapping of the potential donors<sup>40</sup> or of the development partners interested in supporting the development and strengthening of the civil society in Moldova and in their more active involvement in supporting the implementation of the CSDS. Such donors/development partners could be both those who support the development and strengthening of the civil society in Moldova, as a whole, and the organizations/institutions that support certain topics subsections of the associative sector e.g. children, gender, youth, human rights, disabilities, community development etc. The mapping of active NGOs in various areas would provide better knowledge about them and enable more consistent involvement in the making and monitoring of both national and local public policies.

#### *Rec. 11 Make grant provision to NGOs transparent.*

<sup>39</sup> The CSO Sustainability Index is an important analytical tool that has been measuring the progress of the civil society sector from the regions of Central and East Europe and Eurasia and following the development of the civil society sector in 29 countries. The index was developed by USAID in partnership with local organizations of each of the countries analyzed.

<sup>40</sup> By 'donor' I mean any governmental, intergovernmental, nongovernmental or private institution/organization that is available to provide financial or technical support (expertise) in the implementation of the CSDS.

This important aspect fits with making the funding of NGOs transparent and refers especially to the donors community but also to the state public bodies that provide (mini)grants and this was noted both by the state authorities and the NGOs consulted during the evaluation of the strategy implementation. It is remarkable that some donors publish the list of grants provided and of the respective winners, while others, for unknown reasons, still do not do it.

The evaluator thinks that the implementation of this recommendation would enhance both the credibility of NGO funding and the image of donors and grant recipients, and this should not be underestimated because it is a democratic, non-corruptible and public indicator.

**Rec. 12**

*Promote the CSDS more actively, including at the local level, and involve more actively the local public authorities and the local NGOs*

This recommendation comes in response to the final evaluation finding that the 2012-2015 CSDS is very little known (practically unknown) at local level not only to the public at large but also by active local or regional CSOs.

Hence, it is important that the new CSDS is known more by the civil society, especially by the one from outside Chişinău. Therefore, it is important to organize various round tables for promoting and presenting the Strategy as well as its achievements and drawbacks. This is the more so important as the CSDS includes commitments to be implemented at the local level with the involvement of the local public authorities and local organizations. Cooperating with the Local Public Authorities Congress (CALM) would facilitate the implementation of this recommendation and would enhance its efficiency and effectiveness, and this should first of all be in the interest of the CSO representatives who will take active part in developing and implementing the civil society strengthening commitments.

As a result, this would increase not only the representativeness of the commitments, involving a higher number of CSOs but would also impel the necessary changes at the local level i.e. an effect of the waves created from the Chişinău epicenter. Of course, in such conditions, the effects of the amendments to the legal framework or of institutionalizing mechanisms for developing the civil society as well as the achievements and the success stories will appear at the local/community level.

**Rec. 13**

*Create and interconnect a number of dialog platforms between the civil society and the state public authorities.*

*The dialog platforms between the civil society and the state authorities are beneficial because they contribute to reviewing the problems and difficulties in developing the civil society and in identifying the solutions to the respective problems as well as channel the common efforts of state authorities and of NGOs in this sense.*

*Hence, such platforms are welcome and could represent the interconnection with various forums present in Moldova e.g. the Environment Organizations Forum, the Youth Organizations Forum, the Active Ageing Platform etc. Involving such forums, on the one hand, and promoting CSDS subjects, on the other hand, would enhance the visibility, relevance, presence and representativeness in CSDS implementation as well as the ownership of its achievements.*

**Rec. 14**

*Translate the CSDS, including the AP, and its monitoring and evaluation reports to Russian.*

*Moldova is a country with a significant number of ethnical minorities, which account for about 22% of the population, according to the 2004 Census, including two ethnic groups (the Gagauz and the Bulgarians) who live compactly in a number of communities in the south of the country, especially in the Gagauz Yeri Autonomous Region and that traditionally have faced a linguistic barrier since they do not speak Romanian.<sup>41</sup>*

*It is important for the civil society and the public authorities of those communities also to be integrated in the national civil society development process and having the CSDS and its AP, monitoring and evaluation reports translated to Russian, as well as involving them in developing and monitoring the implementation of the CSDS would represent an important step in avoiding their marginalization.*

#### 5.2.4 Operational recommendations

**Rec. 15**

*Develop reporting templates and report against updated progress indicators.*

This recommendation comes as a result of the finding that the narrative reports or the progress/monitoring reports of the CSOs or of the State Chancellery are different both in content and structure, and often include contradictions. There is no template in place that would structure the reporting process.

The State Chancellery reports for the most part are positive but do not follow the structure of the AP, they mainly report on the actions implemented while the unimplemented or unstarted actions usually are less mentioned.<sup>42</sup> It is difficult to use them as basis for a review of things planned versus implemented i.e. it is more difficult to review the progress.

The CSO reports are more structured according to the actions planned, more critical and reflect the logic of the AP intervention, although sometimes they also fail to show the unimplemented actions. Hence, some actions shown in the AP cannot be found in the reports of the State Chancellery or of the CSOs.<sup>43</sup> The CSO reports vary by structure and do not have a single format. Some CSO monitoring reports contain “comments/reactions to the reports of the State Chancellery” and recommendations. Sometimes, the information in the CSO reports is set forth more emotionally.

Both types of reports, of CSO and of the State Chancellery include excuses for the failure to get involved but the most important thing is that neither the State Chancellery nor the CSOs report based on the indicators provided in the AP but based on the activities implemented. Hence, there is no information set out according to the indicators nor was the final evaluation possible based on progress indicators because there are no data available according to the indicators.

<sup>41</sup> The data of the 2014 Census have not yet been processed and published

<sup>42</sup> Except for the report of the State Chancery (March 2014 – February 2015) that contains some of the implementation difficulties

<sup>43</sup> Organization of prize awarding events for CSOs and media that promote the participation/participate in decision making as well as the authorities that progressively assure transparency in decision-making (Act. 1.2.2.1); Setting up the mechanism for notifying NGOs about draft decisions (Act. 1.3.2.2); Setting up an Ethics Board within the National NGO Council (Act 2.4.3.1) etc.

Therefore, the recommendation in this sense would be *to develop single reporting templates and reporting based on progress indicators updated and reflected in the AP.*

**Rec. 16** Carry out an interim evaluation of the CSDS.

An interim independent evaluation would be able to identify sooner the achievements and drawbacks in implementing CSDS actions and would enhance the chances of having it adjusted via the corresponding recommendations, unlike the final evaluation that finds the issues after the planned period has been consumed.

The final evaluation of the CSDS, in addition to the issues set out in this report, would also evaluate how the recommendations of the interim evaluation were implemented.

This would contribute to enhancing the implementation of the commitments made.