

IDB's Ninth General Capital Increase: Implementation and Results

ove Office of
Evaluation
and Oversight

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BACKGROUND NOTE

IMPLEMENTATION OF THE ACCESS TO INFORMATION POLICY: FINAL REVIEW

January 2018



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ACRONYMS AND ABBREVIATIONS

AIC	Access to Information Committee
ATI	Access to Information
CDC	Country Development Challenges
CS	Country Strategy
EXR	Office of External Relations
ICIM	Independent Consultation and Investigation Mechanism
IDB	Inter-American Development Bank
IDB-9	IDB's Ninth General Capital Increase
IIC	Inter-American Investment Corporation
IT	Information Technology
ITE	Information Technology Department
NSG	Non-sovereign Guaranteed
OVE	Office of Evaluation and Oversight
PEC	Program Evaluation Committee
PIC	Public Information Center
SEC/ATI	Secretariat / Access to Information Section
SG	Sovereign Guaranteed
VPC	Vice-Presidency for Countries
VPS	Vice-Presidency for Sectors and Knowledge
XPSR	Expanded Project Supervision Report

I. BACKGROUND

A. The IDB-9 access to information commitment

- 1.1 **The IDB-9 Agreement committed the Bank to the adoption of a new and more expansive information disclosure policy, in line with those of peer organizations.** It also laid out specific requirements for that policy aimed to increase the overall transparency of the Bank in order to strengthen its governance and development effectiveness.¹
- 1.2 **To meet this commitment, the Bank introduced an Access to Information (ATI) Policy in 2010 that reiterated its prior policy's "presumption of disclosure" principle and introduced several major reforms to better put in practice that principle.** In particular, under the new policy several categories of documentation became eligible to be disclosed for the first time, and many eligible to be disclosed simultaneously with their distribution to the Bank's Board.²

B. OVE's mid-term evaluation findings

- 1.3 **OVE's Mid-Term Evaluation of this commitment found that the new ATI Policy was a major step forward in promoting increased Bank transparency, and that initial progress in policy implementation was substantial.**³ The evaluation highlighted progress in creating a governance structure for implementing and overseeing the application of the policy, establishing a framework of classification and disclosure guidelines, initiating staff training, and setting out a communication plan to increase awareness of the new Policy inside and outside the Bank.
- 1.4 **OVE found, however, that while the Policy generally met the IDB-9 formal requirements and was broadly consistent with reforms in other major international institutions, it lacked clarity and consistency on some key points.** In particular, one of the Policy's disclosure exceptions—for "country-specific information"—was not found in comparable form in peer institutions. This exception states that the Bank "will not disclose information contained within country-specific documents produced by the Bank if it has been identified in writing by countries as confidential or potentially damaging to its relations with the Bank." Finding that this exception undermined the goal of transparency, OVE recommended that the Bank close this loophole by revising the Policy to include both a consultation process with countries that left final decisions on the handling of information to the Bank and a remedy of selective redaction rather than nondisclosure of an entire document. In addition, to be consistent with the IDB-9 mandate to disclose project results, results for non-sovereign guaranteed (NSG)

¹ Notably, information produced or received by the Bank is to be disclosed subject to a list of "narrow and clear exceptions;" information sent to the Bank's Board for information and classified as "Public" under an established classification system is to be disclosed simultaneously with its distribution to the Board; a two-stage review process will provide recourse for requester who are denied access to information.

² Documents eligible for simultaneous disclosure include draft Country Strategies, Sector Strategies, Operational Policies, Loan Proposals, and Technical Cooperation Plans of Operations (involving resources of over \$15 million).

³ Inter-American Development Bank, Office of Evaluation and Oversight [OVE] (December 21, 2012). *Mid-Term Evaluation of IDB-9 Commitments. Background Paper: Access to Information Policy (RE-442-3)*. p. 10. Washington, DC: Inter-American Development Bank.

loans needed to be included in the Policy's expressed list of private sector information to be disclosed (as is done in the International Finance Corporation - IFC), with appropriate redaction of confidential proprietary information.⁴

- 1.5 **Finally, OVE found that for the Policy to become fully effective, the Bank needed to do more to:** 1) strengthen IT systems to support accurate and timely public information disclosure and to monitor policy compliance; 2) improve online access to its public information; 3) considerably expand staff training and build greater external awareness of the Policy's principles and procedures; and 4) develop indicators to measure policy effectiveness.

C. Scope and methodology

- 1.6 **This final assessment of the Bank's progress in meeting the IDB-9 information disclosure commitment seeks to answer two questions:** (i) To what extent has the Access to Information Policy been effectively implemented? (ii) What does available evidence indicate about the effectiveness of the Policy? To answer these questions, this paper focusses on five topics: 1) the evidence on policy effectiveness; 2) the adequacy of the governance and oversight structure and processes; 3) revisions to the policy framework; 4) the strengthening of information disclosure IT systems and processes; and 5) the record of disclosure to-date. It reviews developments from mid-2012 through mid-2017.
- 1.7 The review is based on Bank data, mainly from the Access to Information Section (SEC/ATI), which is responsible for the coordination of the implementation of the ATI Policy, the Office of External Relations (EXR) responsible for operating the Bank's channels for making information available, and the information technology (ITE) department responsible for the development of systems to facilitate the disclosure of information. It also draws on interviews with management and staff across units in the Bank, who are in key policy implementation and governance positions, and on a survey of Bank staff conducted by OVE for its overall final evaluation of the Bank's progress in meeting its IDB-9 commitments. (See a list of persons interviewed in Annex II).

II. EVIDENCE OF POLICY EFFECTIVENESS

- 2.1 **In its Mid-Term Evaluation of the implementation of the ATI Policy, OVE found that it was too "early to reach any final conclusion about the effectiveness of the policy."⁵ Five years later, it is still not possible to say how well the policy is working to enhance Bank transparency.** While the Bank has done much to put in place the basic "scaffolding" needed to implement the policy⁶, specific shortfalls persist that preclude knowing the extent to which the Policy has been adequately implemented and whether the Policy has been effective in ensuring transparency. These shortfalls include: the lack of

⁴ Annex I presents a list of the six recommendations in the OVE Mid-Term Evaluation of IDB-9 Commitments.

⁵ Inter-American Development Bank, Office of Evaluation and Oversight [OVE] (December 21, 2012). *Mid-Term Evaluation of IDB-9 Commitments. Background Paper: Access to Information Policy (RE-442-3)*. p. 10. Washington, DC: Inter-American Development Bank.

⁶ Including the establishment of a governance structure, a regulatory framework of classification and implementation instructions, training of staff, and some IT improvements to support information disclosure and improved access.

mechanisms to monitor the accuracy and the timeliness of the disclosure of Bank information; lack of readily available information on the frequency of use of all but the country-specific exceptions to disclosure and the impact of their use on how documents are written and shared; and the absence of measures of the effectiveness of policy implementation on transparency.

- 2.2 **Since 2013, the Bank has used three types of indicators to monitor policy implementation:** 1) the staff rate of compliance with the prescribed timeframes for the publication of disclosable information; 2) SEC/ATI's capacity to respond in a timely way to Help Desk requests for assistance; and 3) indicators of external access to Bank information, including number of visits to the IDB website, project page and ATI webpage, as well as number of downloads of documents and public information requests. Management intends to apply a fourth measure—staff accuracy in the classification of documents which would allow it to analyze the extent to which policy exceptions are correctly applied—once an automated spot checking mechanism is developed (as discussed below). Each of these indicators are, however, measures of various dimensions of policy implementation, rather than measures of the effectiveness of the policy itself. Management has acknowledged that “in the medium term, indicators will need to be created to measure the impact of the greater disclosure of information by the Bank on the institution's transparency.”⁷ Management's current aim, subject to available resources, is to commission a study to identify such effectiveness indicators.
- 2.3 **Along with effectiveness indicators, the Bank lacks a policy review process to assess how well application of the Policy is working overtime.** SEC/ATI currently produces an annual “Access to Information Policy Implementation Report,” which reports on progress and remaining challenges to increasing information disclosure and public access to information. Establishment of a periodic policy review process -- based on both quantitative reporting on indicators of effectiveness and qualitative reporting from all relevant departments regarding the impact of applying the policy-- would importantly supplement this annual implementation reporting.
- 2.4 **The juxtaposition of information from two recent OVE exercises makes the value of the qualitative reporting clear.** In OVE's recent IDB staff survey, the majority of staff responding stated that the ATI Policy has had a “neutral” impact on their work--neither improving nor impeding it.⁸ However, the need to regularly capture lessons of experience in the application of the policy is suggested by an OVE Background Note on Programming that finds obstacles posed by limits on the timing of when Country Development Challenges documents (CDC) can be disclosed. “The CDCs have reportedly improved the quality of discussions with country authorities, certain difficulties notwithstanding. Nevertheless, the fact that the CDC is disclosed together with the Country Strategy (CS) --when the latter is distributed to the Board-- limits the prospects for its use in disseminating country knowledge on a timely basis. Moreover, in some cases country authorities have asked that the CDC continue to be kept confidential, even once the CS was disclosed.”

⁷ Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2016 (AI-13)*. p. 3. Washington, DC: Inter-American Development Bank.

⁸ The survey question was: “Considering your day to day work, complying with the Access to Information Policy is easy, neutral or difficult?”

III. GOVERNANCE AND OVERSIGHT

- 3.1 **In its first year of policy implementation the Bank created a governance structure for carrying out the ATI Policy.** This structure distributes responsibilities across the Bank, with oversight the responsibility of a high-level, interdepartmental Access to Information Committee (AIC); implementation coordination centralized in an Access to Information section (SEC/ATI), located in the Office of the Secretary; and classification and disclosure in the hands of departmental staff. In addition, an ATI Work Group and network of 44 focal points representing each Department play roles in implementation.⁹ See Annex III for a full list of the roles and responsibilities of the AIC, SEC/ATI and other units of the Bank.
- 3.2 **To-date, the focus of the attention of SEC/ATI, and the AIC has been on establishing the foundation for policy implementation, including guidelines, training, and IT processes for applying the policy (as discussed below).** There have been no instances where the AIC has had to perform its other role as “the first stage review mechanism for external requesters” whose requests for information were denied by the Bank, nor its role in “reviewing and deciding [positively or negatively] on requests for overrides related to information other than Board records.” Furthermore, it has exercised its role in “interpreting the Policy in accordance with the Policy’s guiding principles” in only one instance involving disclosure of an OVE oversight study¹⁰ in response to a request from the Vice Presidency for Finance and Administration to classify the document as “confidential—for internal use.”
- 3.3 **There been no consideration of the effectiveness of the policy itself---that is assessment of how well the policy is working to meet the commitment of enhanced transparency and where lessons of experience suggest need for policy revisions.** Indeed, experience over the last seven years suggests that the governance structure lacks a definition of who is responsible for ensuring the achievement of policy effectiveness. SEC/ATI has designated responsibilities only for coordinating implementation, not for assessing policy effectiveness, or pursuing changes in the policy itself. Moreover, it is not clear that the AIC’s responsibility for “overseeing the broad implementation of the policy,” is understood to encompass review and promotion of policy effectiveness. As a result, there is no champion with sufficient authority and standing to proactively push for greater Bank transparency.

⁹ There is also an External Review Panel responsible for conducting second-stage reviews of requests from outside parties for information initially denied, which is not discussed here, however, because it has not received a request for its review.

¹⁰ Inter-American Development Bank (October 14, 2016). *An OVE Oversight Study: The Evolution of Administrative Spending in the Inter-American Development Bank* ([RE-499-1](#)). Washington, DC: Inter-American Development Bank.

IV. POLICY IMPLEMENTATION

A. Revisions to the Policy Framework

- 4.1 While there has been consideration but not revision of the ATI Policy since mid-2012, there have been several revisions of the Policy's regulatory framework of classification and disclosure guidelines, initially written in 2010-12.¹¹

1. Consideration of revising the policy

- 4.2 **Revision of the Policy was considered in 2013, by the Board's Program Evaluation Committee (PEC) in its deliberation on the OVE IDB-9 Mid-Term Evaluation, with particular attention to OVE's recommendation for revision of the Policy's treatment of disclosure of country-specific information.** At the time, management agreed with the OVE recommendation to revise the Policy so as to explicitly grant the Bank final decisions on the handling of information of concern to a country. Though the PEC expressed general support for the recommendation and several Executive Directors expressed interest in discussing with management other possible Policy revisions, members were split on the need for a change in the Policy to respond to OVE's specific recommendation. And, in conclusion, the Chair instructed management to analyze and take account of experience with the use of the country-specific exception in a revision of the newly developed Implementation Guidelines.¹² It also instructed management to find ways of reporting NSG project results.
- 4.3 **More recently, in interviews with OVE, management has pointed to implementation experience which suggests other policy features where consideration of policy revisions would seem warranted in the context of the review of the IIC Disclosure of Information Policy.** This includes: a) a need to narrow the scope of the exceptions for deliberative and administrative information to clarify what aspects of this kind of information should not be disclosed because of possible harm to the institution; b) a change from "disclosed upon request" to "automatic disclosure with prior review" for both historical information and information disclosed overtime in accordance with specified time periods; and c) elimination of the "negative override" which has not yet been used and would seem unnecessary given the establishment of clear disclosure instructions and guidelines and the responsibility of the AIC to interpret the Policy.¹³

¹¹ Inter-American Development Bank (December 14, 2010). *The Access to Information Policy Classification and Declassification System and Review Process* ([GN-1831-31](#)). Washington, DC: Inter-American Development Bank;

Inter-American Development Bank (February 1, 2013). *Access to Information Policy – Implementation Guidelines, Revised version* ([GN-1831-36](#)). Washington, DC: Inter-American Development Bank;

Inter-American Development Bank (June 2015). *Departmental Classification Instructions* (IDBDOCS 37458228). Washington, DC: Inter-American Development Bank.

¹² For management's analysis see *Analysis of Information Disclosure and Exceptions to the Access to Information Policy* ([GN-1831-39](#)), which was discussed at the PEC meeting in February 2014. Based on the analysis, revised Implementation Guidelines defined a process for the handling of cases of non-disclosure of information under the country specific information exception.

¹³ According to the Policy, use of the "negative" override would occur when the Bank decides to exclude normally available information from access based on the premise that access would occasion more harm than benefit.

- 4.4 **Currently, as an aspect of the consolidation of the IDB Group's non-sovereign guaranteed activities in the Inter-American Investment Corporation (IIC), the Corporation is preparing a new information policy drawing in part on lessons of experience of the Bank.** This IIC undertaking could present an opportunity to revisit the issue of revising some specific features of the Bank's policy in light of recent experience and to ensure that the two information policies are fully consistent.

2. Adjustments to guidelines and instructions

- 4.5 **Development of the framework of implementation guidelines and departmental classification instructions has been a continuing effort, involving repeated revisions to take account of implementation experience, and to adapt to changes in the Bank's document and project management IT systems which are described below.**

- The Implementation Guidelines were revised in 2012 and 2014, in part provoked by OVE's Mid-Term Evaluation. Among other things, the revisions add or clarify procedures for: 1) the declassification of historical information and declassification of information to be "disclosed over time;" 2) the handling of cases of non-disclosure of information under the country-specific exception of the Policy, including the redacting of information, informing the public of a redaction, as well as informing the Board of the information to be redacted in a public document; 3) classification for NSG documents, notably to improve access to information on results of NSG operations. A further revision (not available to OVE at the time of this review) was drafted in 2016. The AIC is only now reviewing it, so it has not yet been approved by IDB management and sent for information to the Board.

- 4.6 Departmental classifications instructions were written in 2013 to serve as an additional staff support tool. Early experience had showed that theses detailed instructions were needed to alleviate early confusion on the part of staff on how to apply the Policy's three information classification categories (public, confidential and disclosed overtime) to documents produced by their departments. Subsequently, the Instructions have been continually updated, with a fifth version updated in 2015 and a sixth version expected to go into effect in early 2018, mainly to take account of changes in disclosure procedures under the new Bank file management system, ezShare, (discussed below). **Overall, updates to the regulatory framework have addressed specific challenges encountered to ensuring correct classification and timely disclosure of the Bank's information.** However, the newest proposed revisions of the Guidelines need to be approved and implemented and the ongoing work on the Classification Instructions needs to be completed before it will be possible to know the adequacy of these changes. Moreover, OVE remains of the view that a revision of the Policy is required in regard to the Policy's exception on the handling of country-specific information. Even though the procedures written into the Implementation Guidelines are now being used, revision of the Policy is needed since policy—not guidelines—is mandatory.

B. Developing IT systems and expanding knowledge of the Policy

- 4.7 **Since mid-2012, implementation efforts have continued to focus heavily on the development of IT tools in support of information disclosure and accessibility, and on building internal and external awareness of the Policy's**

principles and procedures awareness through training and outreach. While significant progress has been made in several of these areas, more work continues to be needed -- most urgently in building the IT tools needed to facilitate accurate and timely disclosure of public information.

1. Strengthening IT systems in support of information disclosure and access

- 4.8 **Efforts to develop the use of IT in support of information disclosure have primarily involved:** 1) the creation of ezShare and Convergence as the Bank's new document and project management systems; 2) the establishment of an Information Request Management System, and 3) website improvements for enhanced internal and external access to disclosed information, carried out on an annual basis. Though it has taken more time than initially planned, the on-line request system and website improvements are now in place (as described in Box 4.1).

Box 4.1: Improved internet systems have made access to information easier

A new Information Request Management System has systematized receipt of requests for information, so requests can be answered in a timely manner. This has involved creation of an on-line request form and an automated information request monitoring system. Moreover, as of early 2018, all information requests from the public—both at HQ and country offices---will be processed through one centralized system.

A new IDB project website was launched in 2015 aimed to make significant improvements to the project pages, thereby making it easier to find information on operations.

Changes have been made to the ATI website to improve information search functions, create ways for the public to access all information the Bank discloses, add information on policy content, and create links to other knowledge repositories with the aim to make the website serve as a “one-stop shop” for information.

- 4.9 **However, broader IT systems development in support of information disclosure remains an area of significant unfinished business.** This situation is due in large part to the recent introduction, and need for a well-working integration, of two new systems: 1) ezShare, the new repository and document management system for all Bank information that replaced IDBDOCs and 2) Convergence, the new platform for managing operations. According to procedures established under the ATI Implementation Guidelines, the process for disclosing information requires that employees (“Authors”) classify all documents produced or received in Bank IT systems under one of the Access to Information classification categories (Public, Confidential or Disclosed Over Time). The documents should be uploaded in ezShare, - or into Convergence if they pertain to operations. Authorized employees (“Publishers”) review the profile metadata of documents that have been classified as Public and authorize (disclose) them to be published on the Bank's website. Both ezShare and Convergence have built-in functionalities to facilitate this “ATI workflow” and are integrated so all documents uploaded in Convergence are automatically saved in ezShare and, if public, are disclosed from there. An email-based notification is sent to the appropriate “Authorized Staff” when a public document triggers the ATI workflow and Authors also get notifications once their documents are disclosed by the Publishers.¹⁴

¹⁴

This email alert is a measure that was called for in OVE's Mid-Term Evaluation.

- 4.10 **Challenges encountered in the introduction and integration of these systems have, however, prolonged the policy implementation process in several ways.** First, considerable time has been spent on transitioning documents from the prior document management system (IDBDOCs), finding documents “lost” in the process, and dealing with a backlog of documents pending Publisher authorization (due to incomplete profiles of documents previously stored in IDBDOCs). Second, some work beginning in 2013 within IDBDOCs to support implementation of the ATI Policy has had to be re-configured within ezShare, and specific functionalities introduced into Convergence to support disclosure of operational documents in the project life cycle. Third, multiple technical glitches have arisen that have slowed/complicated the work of the systems’ “users,” especially staff responsible for either classifying or publishing documents, and many continue to require solution.¹⁵ Fourth, under the new document management system internal access to Bank information is more restrictive than it was under IDBDOCs, as staff can only access documents located in folders for which they have been granted specific access authorization.
- 4.11 **The many challenges to the introduction of the new IT systems have also delayed implementation of two automated monitoring mechanisms which have been in the ATI action plans for several years.** One, an automated publication compliance system, was first developed in 2012 to generate reports on compliance with the timelines for document publication and initially deployed in 2013 using IDBDOCs. Subsequently, work has been required to develop and update the system in line with Convergence and ezShare. Therefore, the level of compliance with publication timeframes for key documents continues to be verified by manual review, and as a result compliance reporting is currently limited to just three key operational documents—notably project profiles and loan proposals (as discussed further below) as well as country strategies.¹⁶ A second monitoring mechanism -- for spot checking the accuracy of the classification of documents-- does not yet exist, though it has been a SEC/ATI request to ITE for a couple of years and recommended in mid-2012 by OVE. To create this classification spot-checking mechanism would require, among other things, that classification instructions and identification of the specific exceptions applied to confidential documents be integrated into the ATI workflow processes of both Convergence and ezShare.
- 4.12 **In November ITE stopped work on the construction of system improvements while it formed a Task Force to analyze the full scope of IT solutions needed for improved document management at the Bank, including access to information requirements.** Although ITE expects the Task Force’s work to be completed by the end of 2017, the work stoppage introduces a further prolongation of the ATI policy implementation process.

2. Training staff and building awareness of the policy

- 4.13 **In its Mid-Term Evaluation, OVE found that internal and external stakeholders’ awareness and knowledge of the new policy was limited.**

¹⁵ Examples of problems encountered by users include: email from system alerting publisher to disclose document not received; author not able to undisclose a document to replace it in the system; publisher “denied access” to document needing to be disclosed.

¹⁶ According to Management, the automated publication compliance system is currently being finalized by ITE, in coordination with SEC/ATI.

Notably a Knowledge and Learning Sector (KNL) survey of about 200 staff members responsible for policy implementation revealed a lack of knowledge regarding some details of the policy. Also, an OVE survey found that of those that responded 54% of regular civil society partners were not aware of the existence of the new policy; 33% of authorized Bank staff had not been exposed to any sort of specific training related to the policy they were expected to enforce; and 40% of all operational staff claimed they had not received any training related to the policy. Recognizing the importance of this issue for the effective implementation of the Policy, management has done much to train staff and build external awareness of the policy.

- 4.14 **Efforts to train staff have been extensive.** Notably, management has conducted training sessions for staff across the Bank on the policy requirements and especially the procedures for disclosing information. It has held workshops with departments on classification instructions--revised repeatedly as noted above in response to lessons of experience on the need for clarifications. Also, in late 2016 management introduced a process of certifying authorized staff to ensure their knowledge of classification and disclosure procedures before being able to authorize publication of document on the Bank's public website. A new OVE survey indicates that the training efforts are paying off, as only 8% of the VPS (Vice-Presidency for Sectors and Knowledge) respondents, and 6% of the VPC (Vice-Presidency for Countries) respondents, consider that complying with the Access to Information Policy is difficult.
- 4.15 **In addition, to support staff responsible for information disclosure, SEC/ATI created an ATI help desk in 2012.** It also launched an automated consultation tracking system in 2013 to respond to and monitor internal consultations. Demand for technical assistance has increased since it was established; and according to a SEC/ATI survey in January 2017, the help desk was positively viewed by over 96% of respondents.¹⁷
- 4.16 **Moreover, from 2013-mid 2017, management has taken a variety of awareness-building steps to transmit information about the Policy and its procedures both internally and externally.** This effort has included internal and external campaigns using such things as *Infolinks* messages, newsletters, social media posts, and discussions at IDB Civil Society meetings.
- 4.17 Still, until needed advances are made in monitoring compliance and measuring effectiveness, as discussed below, the Bank cannot know if knowledge of the policy is adequate for its successful application.

¹⁷ Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2016 (AI-13)*. p. 10. Washington, DC: Inter-American Development Bank.

V. TRENDS IN DISCLOSURE AND USE OF EXCEPTIONS

A. Limited evidence of improved document disclosure

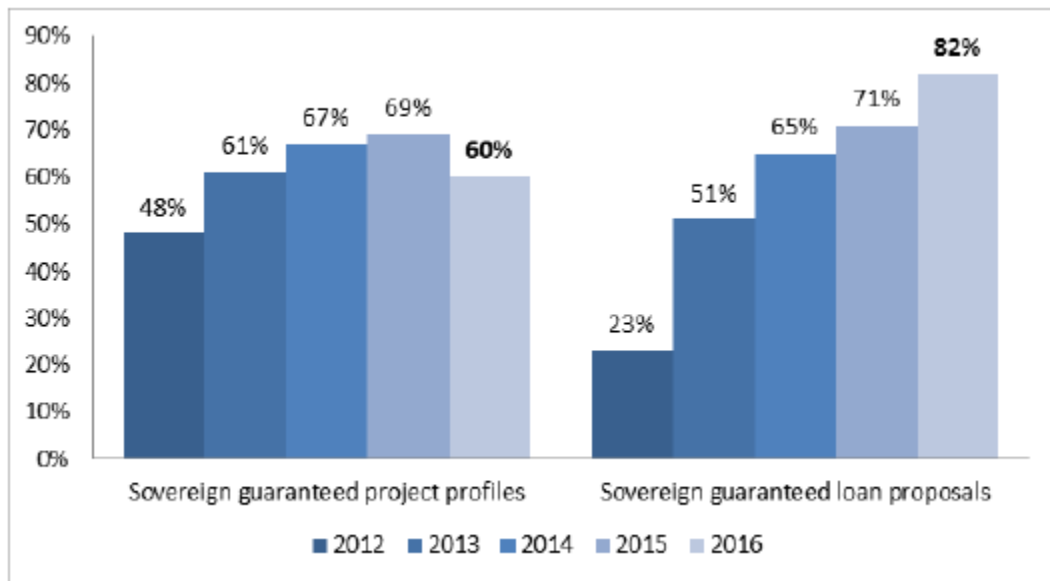
- 5.1 **In its Mid-Term Evaluation, OVE noted that the Bank did not have specific measures or systems to track transparency levels affected by the implementation of the ATI Policy.** Given the limitation, it used two indicators to measure transparency (before and after the adoption of the new ATI policy): 1) the overall share of total IDB-produced documents¹⁸ disclosed to the public and 2) the share of Board-related documents disclosed. What it found was that the impact of the new policy on the share of disclosed documents offered mixed results. On the one hand, the overall number of disclosed IDB documents had slightly decreased under the new policy, while the disclosure of key information—i.e. board-related documents—had significantly increased. This final evaluation was unable to update this information because of insufficient available data for document disclosure in the recent years. The disclosure reporting obstacle is due in large part to the lack of integration of Bank processes and systems that have limited the ability to report on the disclosure of Bank-related documents.
- 5.2 Currently, disclosure data is readily available only for certain key operational documents. For these few documents, there is evidence of a positive trend in recent years. Notably, for the first time, 100% of project profiles and loan proposals corresponding to projects approved by the Bank were disclosed in 2016, and all country strategies approved by the Board in 2016 were disclosed.¹⁹ Management has also reported an increase in the disclosure of historical information, with the number of specific requests for historical information declining (by over 50% from 2015 to 2016) because of increased amounts of historical information disclosed on the website eArchives.
- 5.3 As shown in **Figure 5.1**, there has been improvement in compliance with the publication time frames for two key operational documents tracked by SEC/ATI,²⁰ but since SEC/ATI still has to track information manually (because of IT delays) the full picture on compliance is not known.

¹⁸ These were documents produced and uploaded into IDBDocs.

¹⁹ Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2016* ([AI-13](#)). p. 15. Washington, DC: Inter-American Development Bank.

²⁰ Not shown in the figure, while all country strategies were disclosed in 2016, the rate of compliance with the designated time frame for country strategies was only 60% in 2016. Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2016* ([AI-13](#)). p. 15. Washington, DC: Inter-American Development Bank.

Figure 5.1. Compliance with Publication Time Frames



Source: ATI Policy Implementation Report 2016, p. 16

- 5.4 **However, in 2016 there was a slight drop in the rate of compliance with the publication time frame for project profiles; and for country strategies, which are not included in the figure, the rate of compliance with the time frame in 2016 was only 60%.** According to management, these most recent findings can be explained largely by changes in the new document and project management systems, particularly the use of Convergence by project teams as the new platform for operations. Management expects that the ongoing work on the new systems will make the objective of achieving full compliance in the disclosure of operational data “attainable in the short term.”²¹ That however requires a quick renewal of work on making the necessary system improvements.
- 5.5 **Three types of information have posed special disclosure issues requiring among other things modification of the guidelines and/or instructions to staff:** 1) information related to NSG operations, 2) environmental and social information required in the context of project preparation and implementation, and 3) various documentation produced by the Bank within the project cycle. In each area, actions are still underway to respond to lessons learned in the course of the early implementation of the Policy.
- Disclosure of information on *NSG operations* is limited in the ATI Policy to a list of specific documents. As noted in the OVE Mid-Term Evaluation, the Bank needed to find a way consistent with the protection of proprietary business information to include disclosure of NSG project by project results (as in NSG Expanded Project Supervision Reports - XPSRs) to that list. This change was needed to meet the principle of transparency and the specific Cancun Declaration requirement for “disclosure of project results” and the adherence to best practice. Revisions to VPP (Office of the Vice-President for Private Sector and Non-Sovereign Guaranteed Operations) departmental classification instructions prior to the private sector merge-out have provided

²¹ Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2015* ([GN-1831-42](#)). p. 19. Washington, DC: Inter-American Development Bank.

for a partial move in this direction.²² Furthermore, as reported by Management, the issue of disclosure of private sector project information is being addressed in the context of the merge-out through which IDB Group's NSG activities were consolidated into the IIC. In particular, a working group formed in 2016 worked to ensure that information on NSG IDB legacy operations that were being transferred for administration by the IIC and had already been made available to the public through the IDB website "would remain available and that project teams would be able to continue making the corresponding updates."²³ Furthermore, disclosure of NSG project information will be addressed in the new IIC information policy.

- Disclosure of environmental and social information -- specifically information related to impact assessments and environmental and social analyses-- is addressed in both the Safeguards and ATI policies. Nonetheless, reviews by the Independent Consultation and Investigation Mechanism (ICIM) in recent years have dealt with complaints about access to such information, and in two cases ICIM has issued recommendations to the IDB to: 1) define a procedure to ensure effective disclosure of environmental and social documents on the IDB webpage and 2) include environmental and social disclosure milestones (red flags) in project cycle information. The Bank responded to the first recommendation by clarifying disclosure requirements related to environmental and social safeguards in an April 2017 update of its manual for processing sovereign guaranteed (SG) operations and in instructions on Information Disclosure Requirements for Environmental, Social, Health and Safety (ESHS) Documents. It also responded to the second recommendation by introducing a new module in Convergence that will flag needed environmental and social information in the reporting on key milestones for project preparation-- including, among other things, disclosure of the environmental and social assessments and related documents.²⁴ These are constructive steps, but as they are new it is too soon to know how far they go in meeting needed improvements in this area of information consistent with the Bank's Safeguards as well as ATI policies.
- While actions to support disclosure of information during project preparation has been a priority focus, more project information needs to be disclosed in the implementation stage of projects. In this regard, the Bank is currently promoting measures to enhance disclosure of such documentation as Progress Monitoring Reports and information on financial transaction (i.e., disbursements and reimbursements).²⁵ It is also revising the framework for integrated management and disclosure of the risks of SG projects. Here to, success in achieving accurate and timely disbursement of the publishable information depends heavily on further work on the new IT systems to both facilitate and monitor classification and publication.

²² Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2014* ([AI-12](#)). p. 17. Washington, DC: Inter-American Development Bank.

²³ Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2015* ([GN-1831-42](#)). p. 21. Washington, DC: Inter-American Development Bank.

²⁴ Under the new module, disclosure of the environmental impact assessment and related documents is mandatory prior to analysis mission.

²⁵ Inter-American Development Bank (May 22, 2017). *Access to Information Policy Implementation Report 2016* ([AI-13](#)). p. 3. Washington, DC: Inter-American Development Bank.

B. The use of exceptions

- 5.6 Assessment of the use of the exceptions to disclosure included in the ATI Policy is not possible to date.** Under the ATI Policy, there are ten exceptions for which Bank information is not to be disclosed (as listed in Annex IV). This review intended to assess the frequency with which these exceptions were being invoked, and whether they were being applied in a way that is consistent with the disclosure principle of the ATI policy. However, such an assessment was possible within the scope of this review only for the use of the country-specific exception because it is the only exception currently recorded and tracked. Documents classified as confidential for other reasons are not required to identify the specific exception invoked (either on the written document or in the document management system).
- 5.7 In the case of the country-specific exception, evidence provided by Management and shown in Annex V, indicates a decline in the frequency with which countries have invoked the exception over the last two and a half years --** down from six to eight times in each of the years from 2012 through 2014 to four or less times in the years of 2015 through mid-2017. The information also shows that in most cases restrictions on disclosure are being lifted by countries over brief periods of time. For example, in two cases in 2015 full nondisclosure of each loan proposal was requested temporarily until certain conditions established in the negotiations were met, and once compliance with those conditions was verified, the Bank proceeded to disclose the respective loan proposal.
- 5.8 Management has suggested that this trend in recent practice is due mainly to the fact that the Bank established clear procedures for informing the public and the Board on the use of the exception.** There are other indications, however, that part of the explanation may be that sensitive material is being withheld from Bank documents to avoid a country's recourse to the exception. This practice was described in the survey conducted by OVE as part of its final IDB-9 evaluation, which indicated that roughly 30% of survey respondents reported that they were aware of a case where sensitive material was removed from a document that might "harm country relations" and thus invoke a country's use of the exception.²⁶ The practice was also indicated in interviews with senior staff in both VPC and VPS---though all those interviewed said it was not the ATI Policy alone that was the reason for caution including sensitive information. The institutional culture, shaped by the interest in maintaining good relationships with governments, has created layers of control that can make specialists less inclined to include information that may be flagged as potentially damaging to Bank-country relations.²⁷ How frequent this practice of withholding sensitive information is, and with what impact on the actual transparency and effectiveness of the Bank cannot be known on the basis of the limited monitoring and reporting of how staff have applied the policy.
- 5.9 Regarding the other exceptions, monitoring the extent and the accuracy of their use will not be feasible until staff are required to record the specific exception invoked on the front of documents classified as confidential, and systems are created to enable staff to record exceptions when classified**

²⁶ The survey question was: Are you aware of a case where sensitive material was removed from a document to avoid this exception to the disclosure policy (that is, "harm country relations")?

²⁷ Screening for sensitive information in non-operational documents is routinely performed by sector and region economic advisors.

documents are uploaded into the Bank's document management system. As noted above, this is not yet in the works as part of the SEC/ATI and ITE action plan for ATI related improvements in Convergence and ezShare (though requested by SEC/ATI in 2015 when the document management system was being developed). SEC/ATI has, however, been working with staff in various departments to shore up understanding of how the exceptions should be applied, and in the process, it has concluded that need exists to "narrow the scope" of the administrative and deliberative exceptions as currently defined in the ATI Policy.

VI. CONCLUSIONS AND NEXT STEPS

6.1 Seven years into IDB9, the Bank has taken significant steps to meet its commitment to establish a new Access to Information Policy based on "the presumption of disclosure" and consistent with international best practice.

- Consistent with that commitment, the new ATI Policy was adopted in 2010, to include the presumption of disclosure and the requirement that only documents that contained information meeting a "narrow and clear" list of exceptions were to be held as "confidential" or only "disclosed over time." All other documents were authorized to be disclosed, and many authorized to be disclosed simultaneously with their distribution to the Bank's Board.
- A governance structure has been put in place, with designated responsibilities for policy oversight, coordination of policy implementation, and document classification and disclosure, though leadership responsibilities for ensuring that the policy is working to continuously pursue greater Bank transparency have not been clearly defined.
- A regulatory framework of classification instructions and implementation guidelines has been created, and is still being revised in light of continuous implementation experience.
- There has been extensive training of staff on the requirements of applying the policy and awareness-building efforts to build understanding of the policy's principles and procedures both inside and outside the Bank.
- Some internet tools have been strengthened, though critical work still needs to be done to strengthen key functionalities to support accurate and timely disclosure of information.

6.2 As of the writing of this report, there is limited evidence of increased information disclosure. In addition, there is some evidence of improved compliance in meeting specified timeframes for disclosure—limited however to staff compliance rates for only three key operational documents which have been manually tracked. Based on required reporting to the Board, there is also evidence of a decline in the frequency with which the country-specific exception to disclosure has been invoked, but no readily available way to assess the impact of that exception on the way documents are being written and shared. Also, there is no way to track the frequency and impact of the use of the other exceptions because documents classified as confidential are not required to identify the specific exception invoked either on their cover pages or when they are uploaded into the document management system.

- 6.3 **Overall, implementation progress has been much slower than initially planned, in part due to unanticipated challenges of designing and redesigning processes and procedures mid-way into the ATI Policy implementation effort in order to take account of the introduction of two new IT systems (for operational and document management).** This prolonged implementation effort has meant that to date management attention has remained focused heavily on developing needed classification and disclosure tools and procedures and on training, leaving largely unaddressed as yet the task of monitoring of the effectiveness of the implementation of the policy and the policy itself.
- 6.4 **The current situation leaves a critical agenda of issues to be addressed over the next several years if enhancing transparency and access to information continues to be a priority of the Bank.** These issues include:
- Resolution of IT issues—as a matter of priority—to speed the creation of needed IT functionalities supportive of accurate document classification, timely information disclosure, and policy compliance monitoring.
 - Closing a “governance gap” in leadership and oversight. While SEC/ATI has been active in implementing the current policy, it lacks the mandate and the authority to bring about enhancements in the policy or to pursue other means to increase disclosure and transparency.
 - Development of meaningful measures of policy effectiveness.
 - Establishment of a policy review process, including reporting requirements for all relevant Departments that would indicate among other things key lessons of experience regarding the impact of the policy on the transparency and work of the Bank.
 - Consideration in the near-term of Policy revisions warranted by policy implementation experience to-date. This would likely include, among other things, change in the country-specific exception to make redaction and notification of any redaction a matter of policy (which experience has shown to be a constructive process) and, if needed, other revisions to make sure the Bank policy and the new IIC information policy are fully aligned and consistent.

ANNEX I. RECOMMENDATIONS FROM OVE MID-TERM EVALUATION OF ACCESS TO INFORMATION POLICY

- Revise the policy to clarify that redaction is the remedy for country objections to disclosure of country-specific information under exception 4.1.i of the policy, and make explicit that the final decision on the handling of information lies with the Bank, as it deems appropriate, after consultation in cases of country concern. This requires a revision of the policy since policy—not guidelines—is mandatory.
- Find a way consistent with the protection of proprietary business information to include disclosure of project-by-project results (as in NSG XPSRs) in the list of disclosed NSG information. This is needed to meet the principle of transparency and the specific Cancun Declaration requirements for the “disclosure of project results” and the adherence to best practice.
- Implement a mechanism for spot-checking the classification of documents. This is needed to promote correct classification of all documents, both public and nonpublic.
- Enhance and launch the planned tracking system for timely disclosure of public information. The new IT system to track timely disclosure of information should allow Management to monitor compliance with the policy. In addition to the planned capabilities, OVE recommends implementing an e-mail-based reminder system to automatically alert authorized staff about the existence of new public documents that are ready to be disclosed.
- Ensure adequate accessibility of information by enhancing the website. Users of IDB information will benefit from the consolidation of IDB’s different (old and new) information repositories, the strengthening of IDB’s internal search functionality, and the improvement of the search engine optimization of the Bank’s web pages for popular search engines.
- Identify indicators of transparency and implement a system to track transparency levels over time. This is needed to ensure that policy implementation is effectively increasing the disclosure and accessibility of information produced by the Bank.

Source: Inter-American Development Bank, Office of Evaluation and Oversight [OVE] (December 21, 2012). *Mid-Term Evaluation of IDB-9 Commitments. Background Paper: Access to Information Policy (RE-442-3)*. p. 10. Washington, DC: Inter-American Development Bank.

ANNEX II. LIST OF PERSONS INTERVIEWED

- | | |
|-----------------------------|---------|
| • E. Marcelo Cerna Gomez | SEC/ATI |
| • Irene Vega Duarte | SEC/ATI |
| • Adrien Kay Lopez | SEC/ATI |
| • Lorena Ramirez Castillo | SEC/ATI |
| • Daysi Andrades | ITE/IPX |
| • Gerasimos Valianatos | ITE/IPX |
| • Paola Jurado | ITE/ITO |
| • Norma Fleytas | ITE/ITO |
| • Victoria Marquez-Mees | MEC/MEC |
| • Maria Aránzazu Villanueva | MEC/MEC |
| • Eva Heiss | MEC/MEC |
| • Sylvia Walker | MEC/MEC |
| • Fabiano Rodrigues Bastos | CSC/CSC |
| • Marta Ruiz Arranz | CAN/CAN |
| • Osmel Enrique Manzano | CID/CID |
| • Tomás Serebrisky | INE/INE |
| • Allen Blackman | CSD/CSD |
| • Philip Keefer | IFD/IFD |

Publishers

- | | |
|----------------------------|---------|
| • Rebeca Ruiz Flaguer | CCB/CCB |
| • Jorge Bazan | SCL/EDN |
| • Gabriela Martinez | IFD/CTI |
| • Blanca Tomico | IFD/CTI |
| • Lara Bersano Calot | INE/INE |
| • Dahiana Perez-Felip | VPC/FMP |
| • Silvia Bachilla Arroyo | INT/INT |
| • Marcela Colmenares Amaya | INT/INT |
| • Ayatima Hernander Royas | CID/CID |

ANNEX III. ATI POLICY IMPLEMENTATION ROLES AND RESPONSIBILITIES

A. IDB Staff:

Bank employees who create or receive Information are responsible for properly classifying and saving the Information in IDBDOCS to ensure that: (1) Information classified as “Public” is visibly displayed on the Bank’s website or may be found via the Bank’s search engine, and (2) Information identified as “Confidential” is properly handled as detailed in paragraphs 3.5-3.9.

Additionally, Bank employees are required to comply with the labeling requirements that accompany the Policy as outlined in Annex I.

B. Unit/Division/Sector/Department/Office Heads:

Unit/division/sector/department/office heads are responsible for ensuring their organizational units are in compliance with the Policy, including authorizing publication of “Public” Information, properly handling Confidential Information as detailed in paragraphs 4.4-4.8 below, and publishing Information within the timeframes provided in these Guidelines as well as applicable Classification Instructions. Unit/division/sector/department/office heads may delegate these responsibilities, but remain accountable for ensuring compliance.

C. Project Team Leaders:

In the case of project implementation related Information, the project team leaders are responsible for ensuring that all Information associated with their respective loans and technical cooperations are entered into IDBDOCS and properly classified within the timeframes provided in these Guidelines as well as applicable Classification Instructions. Team leaders may delegate these responsibilities, but remain accountable for ensuring compliance.

D. Staff Authorized to Publish Information (Authorized Staff):

Each sector/department/office head should authorize no more than three Bank employees to publish Information to the Bank’s website. Authorized Staff will ensure documents are properly labeled and published to the Bank’s website in accordance with these Guidelines as well as any applicable Classification Instructions. The names of the staff authorized by sector/department/office heads to perform this function should be submitted in writing to the Secretary of the AIC, and updated as needed. This list will serve as the basis for granting permissions in IDBDOCS to be able to post to the Bank’s website.

E. Access to Information Section (/SEC/ATI), Office of the Secretary:

The Access to Information Section (SEC/ATI), located within the Office of the Secretary, is charged with the coordination of the implementation of the Access to Information Policy in the course of the Bank’s day-to-day operations. SEC/ATI will be responsible for: (i) establishing the necessary guidelines and protocols for the adequate implementation of the Policy, (ii) coordinating with Bank departments/office in the implementation of the Policy, (iii) developing systems of quality control, monitoring and evaluation to ensure proper classification of documents, (iv) supporting vice-presidencies, departments and units in creating

internal classification procedures, (v) providing support to the Access to Information Committee (AIC) related to policy implementation, (vi) coordinating responses to requests for information, in conjunction with PIC, and (vii) supporting the Office of the Secretary in its role to serve as Secretariat to the Access to Information Committee and the External Review Panel.

F. Office of External Relations (EXR):

The Office of External Relations (EXR) is responsible for operating the Bank's channels for making Information available, namely the website and online request system. EXR will report to the Board annually on implementation of the Policy, including an analysis of issues that may need to be addressed and a status report on the Bank's compliance with the Policy.

G. Public Information Center:

The Public Information Center (PIC), in coordination with SEC/ATI, is charged with acknowledging requests, preparing responses when the Information is readily available on the Bank's website, and in all other cases, channeling requests to other Bank organizational units for preparation of responses. PIC will monitor response times in an effort to ensure the Bank answers requests in a timely manner.

PIC will forward all requests involving Historical² Board records to the Office of the Secretary (SEC) for preparation of a response. All other requests for Historical Information will be forwarded to the Records Management Unit of the Budget and Administrative Services Division (ACP/REC). ACP/REC will locate the Information and forward it, together with the request, to the appropriate Vice President or Bank organizational unit within the strategic core for preparing a response. PIC will forward the prepared responses to the requester.

PIC will receive, acknowledge, and forward to the AIC requests for review of decisions to deny access to Information and public requests for Overrides. PIC will receive, acknowledge, and forward to the External Panel requests for second-stage reviews.

H. Records Management Unit (ACP/REC):

The Bank's Records Management Unit (ACP/REC), in coordination with SEC/ATI, is responsible for locating and making available historical Information within the Bank's Records Management System and eArchives, and forwarding the Information, together with the request, to the relevant VP or Bank organizational unit within the strategic core, so that they may prepare a response.

I. Office of the Secretary (SEC):

The Bank's Office of the Secretary (SEC) is responsible for properly classifying Board Records and making them available in accordance with Annex I, Section G of the Policy, the Classification and Declassification System, and these Guidelines. This includes publishing routinely disclosed documents on the website by saving them in IDBDOCS, responding to requests for Board records, and reviewing Historical Information requested to ensure that it is eligible for Declassification and Disclosure.

SEC will confer with the relevant Bank units to ensure that public versions of the agendas, minutes, summaries of deliberations, statements submitted for voluntary

Disclosure by individual Executive Directors and Committee Chair Reports do not contain Information that falls under the Policy's list of Exceptions (see paragraph 4.1 of the Policy).

SEC posts Board decisions related to Overrides on the Bank's website, and communicates Board decisions to PIC for use in responding to requests.

J. Access to Information Committee (AIC):

The AIC is an administrative body that is chaired by the Chief of Staff of the Office of the Presidency and integrated by the Executive Vice President, the four Vice Presidencies and the EXR Manager. The Legal Department will serve as advisor to the Committee. SEC will serve as the AIC's secretariat. When necessary, the AIC may invite representatives from other relevant units to comment on matters submitted to the Committee's consideration. SEC will participate in all AIC discussions involving Board records.

The AIC is responsible for: (a) overseeing the broad implementation of the Policy; (b) interpreting the Policy in accordance with the Policy's guiding principles; (c) reviewing and deciding on requests for Overrides related to Information other than Board records, both positive and negative; (d) reviewing and deciding on requests for reviews received from external requesters whose requests were denied by the Bank; (e) approving Classification Instructions; (f) updating these Guidelines as needed; and (g) establishing service fees and standards.

On matters of Policy interpretation pertaining to the Board of Executive Directors, the AIC will bring potential issues to the attention of the Board through the Organization, Human Resources and Board Matters Committee.

K. External Panel:

As provided in the Policy, the role of the External Panel is to conduct second-stage reviews and render decisions in response to eligible requests, in accordance with Section IV of the Classification and Declassification System and Review Process document (GN-1831-31) and Section VI of these Guidelines. The Panel, comprised of three members, will be independent of any Bank organizational unit or official. Panel members shall be nominated by the President and appointed by the Board of Executive Directors for a three-year renewable term to a maximum of six years. Each member of the Panel shall render his or her services on an as-needed basis and shall participate in each second-stage review that occurs during his or her term. Panel members will be responsible for preparing for and participating in the sessions of the Panel. Members will meet virtually (and in person as may be required), as necessary.

L. Board of Executive Directors:

The Bank's Board of Executive Directors will render decisions in response to requests from the public, Bank Management, and Board members themselves, for Overrides related to Board records. The Board may consult the AIC in making determinations concerning requests for Overrides or reviews of Management decisions to deny requests for Board records. Decisions of the Board of Executive Directors are not subject to review.

M. Access to Information Implementation Work Group (Work Group):

In order to contribute to the effective coordination and implementation of the Policy, an Access to Information Implementation Work Group was created. The Work Group is responsible for providing support, analysis and proposals to the Access to Information Committee and may consider issues related to Policy implementation. It should provide advice to Management on challenges as they arise. The Work Group is chaired by SEC and includes representatives from EXR, LEG and VPF (REC, ITE). When necessary, the Work Group may be expanded to include representatives of other relevant Bank organizational units. The Work Group should also review and make recommendations to the AIC regarding subjects related to approval of the Classification Instructions.

N. Focal Points:

Focal Points are Bank employees designated by the head of their Department to serve as liaisons between their organizational area and the Access to Information Section (SEC/ATI), the Access to Information Implementation Work Group (Work Group) and the AIC. They are to provide input first to SEC/ATI, which will then coordinate their level of involvement with the Work Group and AIC on the status of implementation, keeping all parties informed of issues and concerns as they develop. They will also keep Bank employees in their organizational units informed of all developments and guidance provided by the Work Group and the AIC related to implementation of the Policy.

Source: Inter-American Development Bank (February 1, 2013). Access to Information Policy – Implementation Guidelines, Revised version (GN-1831-36). Washington, DC: Inter-American Development Bank.

ANNEX IV. LIST OF EXCEPTIONS TO INFORMATION DISCLOSURE

1. Personal information:

The Bank will maintain appropriate safeguards to respect the personal privacy of staff members and protect the confidentiality of personal information about them. However, this shall not limit the provision of information concerning specific staff members which may be released at the request of the staff member, or in accordance with Bank policies such as those intended to assure that staff members will meet their personal legal and financial obligations.

2. Legal, disciplinary or investigative matters:

Legal advice, information subject to attorney-client privilege, matters in legal dispute or under negotiation, and legal documentation pertaining to Bank non-sovereign guaranteed projects will not be accessible to the public. This includes also disciplinary and investigatory information generated in or for the Bank, except documents intended for public release pursuant to the Bank's ICIM. The Bank will not disclose documents, reports or communications in circumstances where disclosure would violate applicable law, or could subject the Bank to undue litigation risk. In the context of litigation, the Bank will require that its privileges and immunities under the Agreement Establishing the Bank be respected.

3. Communications involving Executive Directors:

Communications between and within Executive Directors' offices, between those offices and the member country or countries they represent and between those offices and third parties.

4. Safety and security:

The Bank will not disclose information that could compromise the security or safety of Bank staff and their families, contractual employees and outside contractors; Bank assets; or the national security of member governments.

5. Information provided in confidence; intellectual property; and business/financial information:

Information provided to the Bank by member countries, private-sector entities or other parties in confidence or with restrictions on disclosure, will not be disclosed without their explicit authorization. Intellectual property of and financial, business or proprietary information belonging to parties outside the Bank, or intellectual property of the Bank will not be disclosed.

6. Corporate administrative information:

Information related to corporate expenses, including real estate, will not be disclosed, except in the case of the Bank's annual budget program document and as referenced in the quarterly business reports.

7. Deliberative information:

Except as provided for explicitly in the policy, information about deliberations between the Bank and its clients or third parties, of the Board of Executive Directors, the Board of Governors and member countries, as well as information pertaining to the Bank's own internal deliberative processes, will not be disclosed.

8. Certain financial information:

Information that may affect the Bank's activities in capital and financial markets or to which such markets may be sensitive.

9. Country-specific information:

The Bank will not disclose information that is contained within country-specific documents produced by the Bank if it has been identified in writing by countries as confidential or potentially damaging to its relations with the Bank.

10. Information relating to non-sovereign guaranteed operations:

Information and documents relating to non-sovereign guaranteed operations or provided to the Bank in connection with such operations, other than: i) information listed in Annex II of this policy and ii) information with respect to which the respective borrower has expressly consented to disclosure.

Source: Inter-American Development Bank (May 11, 2010). *Access to Information Policy* ([GN-1831-28](#)). Washington, DC: Inter-American Development Bank.

ANNEX V. THE USE OF THE COUNTRY-SPECIFIC EXCEPTIONS

YEAR	COUNTRY	TYPE OF DOCUMENT	CONFIDENTIAL INFORMATION	COMMENTS
2012	Venezuela	Loan Proposal: VE-L1036	Electronic links for: - Environmental and Social Management Report - Technical Analysis - Socioeconomic Assessment - Financial Assessment	
2012	Venezuela	Loan Proposal: VE-L1037	Electronic links for: - Environmental and Social Management Report - Technical Analysis - Socioeconomic Assessment - Financial Assessment	
2012	Chile	Loan Proposal and Loan Contract: CH-L1064	Loan Proposal: - Paragraphs 1.21 and 3.6 Loan Contract: - Paragraph 5.03 of Annex document	
2012	Ecuador	Country Strategy: 2012-2017	Entire document (until May 2013)	Published in July 2013, with the exception of the Results Matrix
2012	Ecuador	Loan Proposal: EC-L1111	Entire document (until May 2013)	Published in December 2014
2012	Group of D2 Countries eligible for the FOE (Fund for Special Operations)	Fund for Special Operations: Proposal for the designation of funds in 2013-2014	Annexes I, III and V	Published without the information identified as confidential
2012/2013	Jamaica	Country Strategy: 2013-2014	Entire document (without timeframe)	Published in October 2013, and subsequently replaced by the 2016-2021 Country Strategy
2013	Honduras	Loan Proposal: HO-L1089	Optional electronic links: - Action Plan to Expedite the Execution of the Transportation Portfolio - Historical Analysis of Institutional and Technical Management of the Project - Analysis of Increased Costs	Published without the information identified as confidential
2013	Group of D2 Countries eligible for the FOE (Fund for Special Operations)	Fund for Special Operations: Revision of the Implementation of the Debt Sustainability Framework and Improved Designation System Based on 2011-2012 Performance	Annexes I, III and V	Published without the information identified as confidential, then subsequently replaced by newer versions
2013	Nicaragua	Project Profile and Loan Proposal: NI-L1081	- Entire Project Profile - Entire Loan Proposal, with agreement to publish an alternate document by the Ministry of Health (MINSa), entitled <i>Program to Optimize Human Talent</i>	Both documents published in December 2013
2013	Nicaragua	Project Completion Report (PCR): NI0181	Sizable portion of document	Published without the information identified as confidential

YEAR	COUNTRY	TYPE OF DOCUMENT	CONFIDENTIAL INFORMATION	COMMENTS
2013	Ecuador	Loan Proposal: EC-L1119	Entire document	Summary of document was published; Confidentiality request was withdrawn in 2014
2014	Bolivia	Project Completion Report: BO-L1006	Portion of document (redaction of Chapter IV, Section B)	Published without the information identified as confidential
2014	Peru	Loan Proposal: PE-L1130	Optional electronic links 1, 2 and 4	Published without the information identified as confidential
2014	Ecuador	Project Profile and Loan Proposal: EC-L1120	Entire documents (2)	Summary of documents published; Confidentiality request was withdrawn in December 2014 and documents were subsequently published
2014	Ecuador	Project Profile, Loan Proposal and Loan Contract: EC-L1145	Entire documents (3); a summary of the Loan Proposal was published in place of the document	Confidentiality request withdrawn. documents published in February 2015
2014	Ecuador	Project Profile, Loan Proposal and Loan Contract: EC-L1140	Entire documents (3)	Confidentiality request withdrawn, documents published in January/February 2015
2014	Mexico	Loan Proposal: ME-L1144	- Required electronic link 1 - All optional electronic links - Objection to the simultaneous disclosure of entire document	Published without the information identified as confidential
2014	Mexico	Loan Proposal: ME-L1111	All optional electronic links	Published without the information identified as confidential
2014	Mexico	ICIM Recommendation and Terms of Reference for a Compliance Review: ME-1107	Entire document (until December 31, 2014)	Published January 1, 2015
2015	Honduras	Loan Proposal and Loan Contract: HO-L1108	Entire documents (2) until the creation and operation of the Revenue Administration Service, which is to replace the DEI. A summary of the Loan Proposal was published.	- Summary of Project Profile published, then replaced by published document in September 2015 - Loan Contract published in March 2016
2015	Honduras	Loan Proposal and Loan Contract: HO-L1103	Entire documents (2) until the creation and operation of the Revenue Administration Service, which is to replace the DEI. A summary of the Loan Proposal was published.	- Summary of Project Profile published, then replaced by published document in November 2015 - Loan Contract published in December 2016
2015	Colombia	Loan Proposal: CO-L1156	Optional electronic link 4	Published in November 2015
2016	Jamaica	Loan Proposal: JA-L1055	Portions of electronic links	Published without the information identified as confidential
2016	Colombia	Loan Proposal: CO-L1163	Entire document (until conditions indicated in the negotiation Act are et.	Summary of document published until all conditions were met in April 2017; document was subsequently published
2016	Mexico	Loan Proposal: ME-L1189	- Paragraph 1.24, including footnotes - All optional electronic links - Objection to the simultaneous disclosure of entire document	Published without the information identified as confidential
2016	Mexico	Loan Proposal: ME-L1256	Portions of electronic links 4, 5 and 6: - #4: SENASICA Diagnostic Laboratory Analysis	Published without the information identified as confidential

YEAR	COUNTRY	TYPE OF DOCUMENT	CONFIDENTIAL INFORMATION	COMMENTS
			- #5: SENASICA Laboratory Re-engineering Plan - #6: SENASICA Sustainability Plan of CNRSA	
2017	Trinidad and Tobago	IDBG Country Strategy: 2016-2020	Electronic link <i>Trinidad and Tobago: Country Development Challenges</i>	Published without the information identified as confidential
2017	Bahamas	Loan Proposal: BA-L1033	- Paragraphs 1.14, Section D; 1.27; 1.28 and 1.29 - Redaction of optional electronic links 1, 6, 8 and 9	Published without the information identified as confidential (publication of Spanish version remains pending)

Source: SEC/ATI