ACCESS TO INFORMATION:

ASSESSING IMPLEMENTATION OF THE LAW ON TRANSPARENCY OF PUBLIC INFORMATION IN MONGOLIA, ENACTED IN 2021.

GLOBE INTERNATIONAL CENTER
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EXECUTIVE SUMMARY

The right to information (RTI) is a fundamental human right that enables access to information held by public authorities. It promotes transparency, strengthens accountability, supports public participation, and reinforces the protection of other human rights. In Mongolia RTI is explicitly recognized in the Mongolian Constitution. Specifically, Article 16.16 and 16.17 guarantee citizens' freedom of opinion, expression, the right to publish, and the right to information. This is further reinforced by laws like the Law on Media Freedom (1998), the Law on Public Radio and Television (2005), and the Law on Information Transparency and the Right to Information (2011).

In 2021, the Parliament of Mongolia adopted amendments to the Law on Public Information Transparency (Law on Information Transparency and the Right to Information). The key changes introduced by the amendments are as follows:

a) Clarification of response timelines and conditions for extension – a response must be provided within 10 working days. If an extension is necessary, they must provide a written explanation with legal justification in a timely manner.

b) Expansion of the scope of institutions subject to disclosure obligations. In addition to government bodies, state-owned and state-involved enterprises, political parties, and non-governmental organizations were brought under the law's scope, obliging them to proactively disclose public information.

c) Refinement of legal grounds for refusing access to information. Any refusal must be provided in writing, citing the specific legal basis and, where relevant, explaining how disclosure would cause harm.

d) Improved oversight and accountability mechanisms. The amendments strengthen provisions for administrative liability in cases of unlawful denial of information, delayed responses, or provision of incomplete or misleading information.

This assessment evaluated the performance of both the central oversight body and 20 public authorities across various sectors, including ministries, aviation authorities, state owned enterprises, the political party, associations, provincial governor offices, and local development funds.

The methodology explores four primary areas: central measures, which focus on the oversight body; institutional measures, which focus on the formal actions taken by authorities to enforce the law, such as appointing and training public information officers; and the two main approaches to information dissemination: proactive disclosure (sharing information without a request) and reactive disclosure (providing information upon request).

The RTI Evaluation methodology allocates colour grades for performance in each area and then the overall average performance. These grades are calculated based on scores which are allocated according formula, which are detailed below in each assessment area. The full methodology is available at: http://www.rti-evaluation.org/wp-content/uploads/2020/02/Methodology.20-02- 17.pdf. The way scores are converted to grades is set out in the table below:

Chart for Converting Scores to Grades

Red	Yellow	Green
0-0.33	0.34-0.66	0.67-1.0

And the final grades earned by Mongolia in the different areas covered by the assessment are reflected in the below graph.

Mongolia's overall "low-yellow" grade reflects systemic weaknesses, particularly in Central Measures and Proactive Measures. Performance in proactive and reactive information dissemination was further undermined by the Central Body's (as defined in Law on Public Information Transparency, Section 8.17) failure to establish structured evaluation mechanisms, implement timely recommendations for transparency improvements, or develop standardized protocols for information request handling.

Critical gaps include (1) reporting deficiencies due to the lack of a systematic reporting framework and public complaint statistics; (2) operational weaknesses from the lack of uniform procedures for request-handling personnel; and (3) structural barriers caused by unclear accountability lines and performance metrics.

While recent legal amendments, Covid-19 pandemic-related legislations (including Government Resolution No. 4) restricting advocacy and training expenses, and post-2024 election reforms (including cabinet restructuring and policy realignments) may partially explain these challenges, sustained intervention remains critical to ensure compliance. Priority actions should address procedural standardization, public accountability mechanisms, and capacity-building for enforcement entities.

The Central Body (a supernumerary Council) should prioritize consolidating its institutional authority by (1) establishing an independent, transparent budgeting mechanism; (2) implementing standardized training programs for staff and members; (3) systematically publishing appeal decisions online; and (4) producing detailed annual reports that open to public. Additionally, the Council must address critical gaps in its performance, including actively promoting public understanding of the Law, conducting mandatory training for public information officers, and providing substantive input on legislation related to information rights.

Granted Mongolia has established formal mechanisms for addressing right to information violations through both administrative and legal frameworks, critical gaps remain in implementation. Most significantly, there is currently no comprehensive system requiring relevant institutions to collect or report disaggregated data on RTI-related complaints, limiting transparency and accountability in the process.

The table below presents the aggregated results by public authority. Two of the 20 authorities received a green grade, namely the National Human Rights Commission (0.7) and the Civil Aviation Authority (0.75). Twelve of the

20 authorities received a yellow grade, while the remaining six scored in the red grade range, with scores as low as 0.08. Bayan Ulgii Aimag Governor's Office reached highest among yellow graders (0.63).

The low scores may partly stem from uneven participation, as at least six out of 20 declined or were unavailable for interviews. While the NHRC (a Central Body member) formally endorsed the assessment process, only 14 of 20 public bodies responded on time or cooperated fully. Furthermore, just 13 out of 20 completed the self-assessment request. These gaps could have affected scoring consistency

Overall Results by Public Authority

Public Authority	Institutional Measures	Proactive Disclosure	Reactive Disclosure	Average	Grade
National Human Rights Commission	N/A	0.52	0.87	0.70	🟩
Ministry of Family, Labour and Social Protection	0.59	0.49	0.37	0.48	🟨
Ministry of Justice and Home Affairs	N/A	0.65	0.44	0.55	🟨
Communications Regulatory Commission	0.56	0.71	0.59	0.62	🟨
General Election Commission	0.62	0.45	0.56	0.54	🟨
The Civil Aviation Authority	N/A	0.84	0.70	0.77	🟩
The State General Prosecutor Office	N/A	0.39	0.74	0.58	🟨
Supreme Court	0.62	0.54	0.41	0.52	🟨
The Capital City Housing Corporation	0.56	0.24	0.41	0.40	🟨
Judicial General Council	0.56	0.43	0.59	0.53	🟨
Mongolian Tax Administration	0.5	0.61	0.70	0.60	🟨
Mongolian National Public Radio and Television	N/A	0.13	0.30	0.22	🟥
Mongolian People's Party	N/A	0.10	0.19	0.15	🟥
Mongolian Television Association	N/A	0.05	0.11	0.08	🟥
Tavan Tolgoi Tulsh LLC	N/A	0.13	0.19	0.16	🟥
Orkhon Aimag Governor's Office	0.56	0.45	0.30	0.44	🟨
Khovd Aimag Governor's Office	0.44	0.45	0.30	0.40	🟥
Bayan Ulgii Aimag Governor's Office	0.69	0.50	0.70	0.63	🟨
Bulgan Aimag Rashaan soum Local Development Fund	N/A	0.09	0.11	0.10	🟥
Tuv Aimag Bayankhangai soum Local Development Fund	N/A	0.16	0.11	0.14	🟥

Public authorities—including state-owned enterprises, soum-level development funds, sector associations, and political parties—demonstrated the weakest performance across all four assessment categories of the assessment.

Six non-responsive bodies were omitted from the assessment of Institutional Measures. This approach was necessary as these bodies failed to submit self-assessments, leaving no alternative data. Three other public bodies (Aviation, Prosecutor, Justice) did provide self-assessments, demonstrating potential full or partial compliance on Questions 1, 2, 6, 7, 10, 11, and 16. While these bodies expressed willingness for interviews, time constraints prevented their inclusion in the assessment. As a result, they also were omitted from the assessment. The NHRC was not included in Institutional Measures as they are part of the assistance process for the evaluation team.

INTRODUCTION

Access to public information constitutes a fundamental right that protects expression, enables democratic governance, reinforces human rights, and drives progress toward the Sustainable Development Goals.

Mongolia's Right to Information (RTI) framework has undergone significant evolution since the early 2000s, primarily driven by civil society advocacy efforts - most notably through the work of the Globe International Center (GIC). The foundational 2011 Law on Information Transparency and Right to Information established comprehensive coverage across government bodies, courts, and state-owned enterprises. Subsequent reforms, particularly the 2021 Public Information Transparency Law[1] (that is an updated and expanded version of the 2011 law), substantially strengthened the framework by mandating proactive digital disclosure of public information. This was further reinforced in 2022 through amendments that expanded by 68[2] the categories of information subject to mandatory publication requirements.

Despite this progress, several challenges persist. Over 1,700 types of information remain restricted, and vague definitions under the Law on State and Official Secrets[3] continue to undermine transparency efforts.

Enforcement remains a significant challenge. Although Mongolia ranks 65th in the 2024 Global RTI Rating[4]— recognizing its legal framework—the rating does not account for practical implementation, where Mongolia continues to face difficulties. Monitoring efforts by the Independent Research Institute of Mongolia (IRIM), through its annual Digital Transparency Index (DTI)[5], have highlighted similar issues. Following the 2022 law, IRIM updated its methodology to align with the new requirements, evaluating 97 institutions in 2024 and finding persistent gaps in proactive disclosure and data accessibility.

Mongolia's participation in the Open Government Partnership (OGP) since 2013 has provided a platform for promoting transparency reforms. However, independent reviews of Mongolia's OGP Action Plans (2021–2023 and 2023–2027)[6] have consistently found limited implementation and oversight.

Despite Mongolia's comprehensive right-to-information laws, enforcement gaps persist due to overlapping secrecy provisions, weak compliance systems, bureaucratic inefficiencies, and low public awareness of rights.

Oversight institutions, including the National Human Rights Commission of Mongolia (NHRC) and the Independent Authority Against Corruption (IAAC), offer formal channels for RTI-related complaints. However, enforcement effectiveness is limited by a lack of disaggregated reporting, procedural complexity, and low public awareness. For

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[1] https://legalinfo.mn/mn/detail?lawId=16390263044601
[2] Article 8, the Law on Public Information Transparency https://legalinfo.mn/mn/detail?lawId=16390263044601
[3] https://legalinfo.mn/mn/detail?lawId=12408
[4] https://countryeconomy.com/government/global-right-information-rating/mongolia
[5] https://www.irim.mn/p/42
[6] https://www.opengovpartnership.org/documents/mongolia-action-plan-review-2023-2027/

example, the NHRC processes approximately 280[7] complaints annually but does not publish specific data on RTI violations, reducing accountability and transparency.

Mongolia's RTI framework establishes a clear three-tier appeals process for denied information requests - beginning with an administrative complaint, escalating to higher-level appeal, and culminating in judicial review - while mandating comprehensive annual disclosure of request statistics, denials, and complaint outcomes. Despite these provisions, the system's effectiveness is compromised by exclusive reliance on internal oversight and judicial review (without an independent commission), coupled with persistent implementation challenges including weak enforcement, lengthy resolution processes, and broad exemptions for state secrets, national security, and personal privacy protections.

METHODOLOGY

While Right to Information (RTI) laws have existed for decades in many countries, standardized frameworks to evaluate them emerged only recently. The 2011 RTI Rating marked a significant advancement by providing a robust tool to assess the strength of legal frameworks. However, comprehensive methodologies to measure practical implementation gained traction only after the 2015 Sustainable Development Goals (SDGs) established Indicator 16.10.2, which explicitly calls for the adoption and enforcement of RTI laws. This momentum led, in November 2019, to the Centre for Law and Democracy (CLD)[8] unveiling its comprehensive methodology for evaluating RTI implementation quality at the Paris Peace Forum.

The assessment's primary objective is to systematically identify strengths and weaknesses in the implementation of Mongolia's Law on Public Information Transparency, with the ultimate goal of informing corrective measures to address gaps. This methodology specifically evaluates compliance by central authorities and obligated public bodies, measuring their adherence to legal requirements and the law's practical effectiveness.

Designed as an analytical framework rather than a simplified rating system, this comprehensive assessment tool empowers oversight bodies, government agencies, and public institutions to systematically evaluate and compare performance across institutions, operational domains, and external jurisdictions.

SELECTION OF PUBLIC AUTHORITIES

The RTI Evaluation methodology employs a targeted sampling approach rather than attempting comprehensive assessment of all public authorities - a logistically impractical undertaking given the vast number of institutions involved. Instead, it mandates evaluation of a representative sample comprising at least ten diverse authorities plus the relevant oversight body to ensure meaningful, actionable results while maintaining feasibility. For this exercise, the performance of 20 different public authorities was reviewed: National Human Rights Commission (NHRC), Ministry of Family, Labour and Social Protection (MLSP), Ministry of Justice and Home Affairs (Justice), Communications Regulatory Commission (CRC), General Election Commission (Election), The Civil Aviation Authority (Aviation), The State General Prosecutor Office (Prosecutor), Supreme Court (Supreme), The Capital City

Housing Corporation (NOSK), Judicial General Council (JGC), Mongolian Tax Administration (MTA), Mongolian National Public Radio and Television (MNB), Mongolian People's Party (MPP), Mongolian Television Association (MTX), Tavan Tolgoi Tulsh LLC (TTT), Orkhon Aimag Governor's Office (Orkhon), Khovd Aimag Governor's Office (Khovd), Bayan Ulgii Aimag Governor's Office (BU), Bulgan Aimag Rashaan soum Local Development Fund (Bulgan), Tuv Aimag Bayankhangai soum Local Development Fund (Tuv).

The authorities were selected based on two primary criteria to ensure comprehensive representation:

1. Geographical Diversity: Five provincial and soum-level authorities were included to guarantee regional coverage.

2. Institutional Variety: A deliberate cross-section of public bodies bound by transparency obligations (Ministries and regulatory agencies; State-owned enterprises and public funds; Local governors' offices; Public associations and political parties)

GRADING

The methodology employs a comprehensive system to assign grades for each assessment area, as well as overall scores for the country and each public authority. The criteria used for grading are outlined in detail in the each of the below Methodology areas. Scores were assigned on a scale of 0 to 1 and then converted into colour grades based on the following chart.

Chart for Converting Scores to Grades

Red	Yellow	Green
0-0.33	0.34-0.66	0.67-1.0

The colour scores denote the following:

Colour Score	Description
Red Score	Performance in the relevant area is significantly below what the law requires or better practice as manifested in other countries, suggesting a need for major improvements to be introduced in terms of practice – *considered as weak*.
Yellow Score	Performance in the relevant area is adequate in terms of what the law requires or better practice in other countries, but there remain important areas for improvement to be introduced to meet fully what is required – *considered as average*.
Green Score	Performance in the relevant area is strong, and the requirements of the law and better practice standards are largely being met. At the same time, depending on where exactly on the green spectrum performance lies, there is still room for further improvement to reach truly best practice in the area – *considered as effective.*

ASSESSMENT TOOLS

The RTI Evaluation methodology outlines seven assessment tools to evaluate performance across four key areas. These tools include: a literature review; a desk review of proactive disclosure (by the assessed public authorities); a desk review of appeal decisions (by the oversight body); key informant interviews (with various individuals such as public information officers, oversight staff, and frequent requesters); self-assessments (by both the oversight body and the public authorities); office visits (to the assessed authorities); and blind information requests (made to the assessed public authorities). For this assessment, five of these seven tools were used, as detailed below.

1. A Desk Review of Proactive Disclosure

Ultimately, proactive publication ensures that information is accessible, making it essential to test whether assessors can access that information as a key measure of success in this area. The proactive disclosure practices of all 20 of the assessed public authorities were reviewed as part of this assessment exercise. The main approach here was to review the websites of these authorities to assess whether they proactively published the documents as required by Article 8 (8.2;8.3;8.4;8.5;8.6) of the RTI law of Mongolia. This includes: the data subject's functions, operational strategies, organizational structure, human resources, budget, financial status, procurement, and public services. Information not legally restricted must remain transparent. This covers organizational details, citizen participation procedures, bid advertisements, procurement contracts, financial reports, guidelines for information requests, domestic and international agreements, policies, strategies, and relevant plans. It also includes information categories, details of public information officers, and the annual report in accordance with the Law.

2. Key Informant Interviews

Key informant interviews were successfully conducted with representatives from 10 out of the 20 selected public authorities, as well as with 8 stakeholders from various relevant groups, ensuring a diversity of perspectives in the evaluation process. At least six out of 20 declined or were unavailable for interviews while the NHRC (a Central Body member) formally endorsed the assessment process.

Key Informant Interviews

Group	Number
1. Officials	10
2. Media	3
3. Civil society	4
4. Complainants	1
5. Oversight body	0
Total	**18**

A full list of those interviewed at both public authorities and from the different groups can be found, respectively, in Annex 1. The questionnaires used in these interviews are available as annexes to the full methodology.[9]

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[9] The full methodology is available at: https://www.rti-evaluation.org/wp-content/uploads/2024/06/Complete-Methodology.pdff.

3. Office visits

This assessment tool is designed primarily to evaluate whether information is being proactively published in physical forms at the office, such as on information boards/bulletins. The assessment team visited all 20 public authorities in person and took photos of the information boards, which are required by Article 8.12 of the Law.

4. Self-Assessments

The methodology incorporates two distinct self-evaluation instruments:

- **Self-Assessment 1**: Designed for completion by the oversight body (the Council), including both members and staff
- **Self-Assessment 2**: To be completed individually by each assessed public authority

Implementation notes:

1. The Council's participation was limited to one civil society representative. This individual participated in both the interview (recorded in the key informant interview table) and completed the Self-Assessment 1 questionnaire.
2. Public authority respondents for Self-Assessment 2 are identified in the accompanying table, including:

Self-Assessment 1 Respondents

Organization name	Position
Administrative New Initiatives NGO	Head (a member of the Council)

Self-Assessment 2 Respondents

Organization name	Position
MLSP	Public relations officer
CRC	Officer in charge of Closed and Confidential information
Election	Officer in charge of Closed and Confidential information
MTA	Taxation Senior Inspector
Supreme	Public Relations Officer, Criminal Chamber of the Supreme Court
Aviation	Director of the Department of Administration, Management, and Legal Affairs
NOSK	Information Officer
Prosecutor	Head of Public relations Department, senior prosecutor
JGC	HR specialist
Justice	Senior Specialist, Department of Public Administration and Management
Orkhon	Public relations officer
Khovd	Public relations officer
BU	Public relations officer

The six that failed to respond to the numerous letters, emails and phone requests are: Mongolian National Public Radio and Television (MNB), Mongolian People's Party (MPP), Mongolian Television Association (MTX), Tavan Tolgoi Tulsh LLC (TTT), Bulgan Aimag Rashaan soum Local Development Fund (Bulgan), Tuv Aimag Bayankhangai soum Local Development Fund (Tuv).

5. **RTI Requests**

The RTI Requests assessment component involved submitting blind information requests to each of the 20 assessed public authorities through multiple channels - including formal letters, emails, and phone calls - guided by a detailed protocol that evaluated both procedural compliance (including response timeliness and fee appropriateness) and substantive outcomes (such as information provision, reasoned refusals, or unreasoned denials). Three requests were made to each authority through these various communication methods, representing NGOs, media organizations, and civilian individuals, with the full list of submitted questions provided in Annex 2.

ASSESSMENT AREAS

The RTI Evaluation methodology assessed four key thematic areas, commencing with **Central Measures** - an evaluation of the Access to Information Council's (Central Body) performance. This assessment utilized multiple methodologies, including document review, key informant interviews (including experiences with complaints), on-site observations, and stakeholder self-assessments. However, participation was limited, with only one completed self-assessment submitted by an NGO representative serving on the Council.

The **Institutional Measures** component evaluates the systemic actions implemented by public authorities to ensure effective compliance with the Law. This assessment primarily utilized two key methodologies: (1) in-depth interviews with responsible officials and (2) comprehensive self-assessment evaluations conducted by the relevant authorities. The assessment revealed significant gaps in participation, with only 10 out of 20 authorities providing interviews and 13 submitting self-assessment evaluations. This partial engagement potentially limited the comprehensiveness of the Institutional Measures evaluation.

The next two areas, **Proactive Disclosure** and **Reactive Disclosure**, assess the actual performance of public authorities in disseminating information. **Proactive Disclosure** is primarily assessed through a desk review of the availability of information online, supplemented by key informant interviews and self-assessments. **Reactive Disclosure**, which involves the release of information in response to requests, is mainly evaluated through the RTI testing methodology, involving blind requests for information submitted to each public authority. This is also supplemented by key informant interviews and self-assessments.

CENTRAL MEASURES

A non-standing (supernumerary) oversight council operates under Mongolia's central legal administration (Ministry of Justice and Home Affairs) on a part-time basis, comprising representatives from the Anti-Corruption Agency, National Human Rights Commission, e-governance authorities, and civil society organizations. This periodic

advisory body will convene as needed to coordinate transparency initiatives, evaluate open information implementation, and provide non-binding policy recommendations to improve public access to government data.

The Mongolian Government order No. 352 of 2022 approved the "Procedure for ensuring transparency of public information and evaluating against transparency criteria/indicators" and according to its section 4.1 all ministries should compile affiliated reports of their sectors on open information transparency implementation. On 21 January 2025, the Ministry of Justice and Internal Affairs issued Official Letter No. 3/383 to all ministries regarding this matter.

According to Section 2.7 of the Operating Procedures of the Council established under Annex 1 of Joint Order No. A/268 and A/48 of 2022 by the Minister of Justice and Internal Affairs and the Minister of Digital Development and Communications, the Council is mandated to monitor the implementation of open information transparency and provide recommendations when necessary to information holders regarding their compliance with open information requirements.

The evaluation particularly focused on 11 questions relevant to grading, which are listed below and was based on information gathered through interviews with key informants, document analysis, records of complaints, and their resolutions, among others. The standard CLD methodology contains questions on the timeliness of appeals and due process rights on appeals. The Council does not itself has a mandate to adjudicate appeals, and these could not be assessed in relation to the existing administrative appeal system in Mongolia due to insufficient data, so these factors were therefore excluded from the scoring. The scoring was based on five objective questions, which allowed for scores of either 0 (no compliance) or 1 (full compliance), as well as six qualitative questions which also allowed for scores of partial credit (.5). The final score consisted of an average of all eleven questions which was then converted into a colour grade based upon the chart found in the grading section above. The results are summarised below.

Objective Evaluation (Yes = 1; No = 0)		Oversight Body
1	Has funding been allocated?	0
2	Does the body recruit its own staff?	1
3	Are the body's appeals decisions available online?	0
4	Has the body produced and published an annual report for the last two years?	0
5	Has the body published a guide for requesters?	0
	Average (Objective Evaluation)	0.20
Qualitative Evaluation (Strongly = 1; Partially = 0.5; Weakly = 0)		
6	Have the members been appointed?	1
7	Are the members of the body independent and effective?	0
8	Is the funding provided to the body reasonably sufficient for it to discharge its functions?	0
9	Has the body made reasonable efforts to raise public awareness?	0.5
10	How effective are the measures taken to provide training to officials?	0
11	Has the body made a reasonable effort to comment on draft laws that affect the right to information?	0

Average (Qualitative Evaluation)	0.25	
Average	**0.23**	
Overall Grade		

As Table shows, the overall grade of the Council on the assessment is red, and it may be noted that this represents a low red (red is allocated for scores ranging from 0.00 to 0.33).

Despite member appointments (per Question 1), the oversight body suffers from perceived bias, unproven effectiveness, and declining engagement. Annual meetings, once well attended, now see only half the members attending—a trend documented by the council's NGO representative.

The Council's financial transparency remains critically deficient, with members relying solely on unsubstantiated claims about the budget's existence while failing to produce any auditable financial reports. Although partial funding likely supports PIO training and awareness initiatives, the complete absence of dedicated RTI budget lines in both the Council and member authorities' financial records makes expenditure verification impossible and systematically undermines compliance oversight. Stakeholder interviews exposed universal deficiencies in RTI Law awareness - among both civil servants and citizens - due to insufficient outreach and education efforts, severely limiting the law's effectiveness.

No institution—whether the NHRC, prosecutors, courts, or government helplines—currently isolates RTI-related cases in their public reporting, obscuring transparency violations.

Notably, a 2020 case involving delayed disclosure of election expense reports illustrates institutional resistance. Only after the intervention of NHRC (a member of the Council) and Youth Policy Watch NGO (YPW)[10] were the reports eventually released.

During the assessment, anecdotal reports surfaced of one official being disciplined under violation laws related to RTI implementation (the case was allegedly discussed during the Council meeting). However, no verifiable documentation - whether disciplinary records, official reprimands, or corroborating testimony - could be obtained to substantiate this claim. The absence of written evidence leaves this incident unconfirmed despite its potential significance as an enforcement case.

Mongolia has established formal mechanisms for addressing violations of the right to information, anchored in both administrative and legal frameworks. Disaggregated data reporting on RTI-related complaints by all relevant institutions is missing.

Without published appeal decisions, accessible complaint mechanisms, or monitoring of refusals, the law's implementation remains largely theoretical rather than operational, favoring institutional opacity over public accountability.

This case highlights systemic transparency issues: the oversight council under the Justice Ministry exists but operates without visibility (no annual reports, published appeals data, or public activities), while no meaningful measures like trainings or regional outreach programs have been implemented to improve law enforcement. Public awareness remains critically low, creating no pressure for proper implementation.

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[10] https://www.policywatch.mn/

Regarding geographical outreach, interview respondents identified the Communications Regulatory Commission (CRC) – as a Council member – as uniquely positioned to achieve nationwide coverage through its existing infrastructure. However, the Council has failed to leverage this potential, with no nationwide recorded initiatives or systematic efforts to utilize the CRC's capabilities for RTI awareness campaigns or implementation support across Mongolia's regions.

Question 4 examines whether the Council published annual reports in the past two years. The document reviews and desktop reviews of 20 websites results confirm no reports were published: a finding corroborated by stakeholder interviews. Notably, nearly all respondents - including public bodies, media, and civil society representatives - were unaware of the Council's existence or activities, with only one Council (NGO representative) member confirming its existence. While current legislation does not clearly mandate public disclosure of the Council's annual reports, such transparency is critical for strengthening the Central Body's impact on law implementation. The Council should therefore propose legislative amendments to require annual public reporting to ensure consistency.

In response to a formal written request from the assessment team for Council-related documentation, the Ministry of Justice and Internal Affairs provided correspondence with the relevant ministry/ministries, accompanied by attached reports concerning public authorities' transparency. That included:

The official letter (Ref. No 3/1626, dated 28 March 2025), a recommendation from the State Secretary, in their capacity as Council Chair, requests ministers and aimag governors with recommendations on need to compile reports by sector and geographical locations. The Council further recommends updating websites to comply with MNS 6285:2017 standards. Additionally, in line with Mongolia's Government Resolution No. 201, authorities were reminded to implement standardized procedures for digitally publishing open information, including monitoring and evaluation mechanisms.

The official letter (Ref. #3/1627, dated 28 March 2025) from the State Secretary, in their capacity as Council Chair, requests a specific ministry to provide information regarding special funds omitted from their 2024 reports, and update relevant funds data on the www.shilen.dans.mn (Glass Account) platform accordingly. There were attachments to the letter. Supplementary materials included third-party evaluations, notably the Anti-Corruption Agency and Policy Resolution NGO's *Integrity Assessment-2024* assessment. This review covered multiple sectors and governance levels (ministries, agencies, political parties) and all administrative tiers (national, *aimag*/provincial, and district offices). It includes a dedicated **transparency indicator** measuring ongoing compliance with legal implementation.

However, no related responses, reports, or information from the Ministry of Justice and Internal Affairs are publicly available on their website. While this assessment does not dismiss the Council's behind-the-scenes work, data collection, or reporting efforts, the lack of documented evidence and absence of published reports prevent their inclusion in the current evaluation. We hope future assessments will benefit from clearer requirements and greater transparency from the Council in demonstrating its activities.

The table indicates that the Council has not published a requester guide (Q 6) and only partially complied with public awareness efforts. Interview respondents speculated that the decline in advocacy activities may stem from government cost-cutting measures post-pandemic, which classified many transparency initiatives as non-essential. However, without access to historical budget data, these observations remain speculative rather than conclusive.

Interviews with aimag-level officials indicated that the CRC had provided limited guidance on information dissemination matters, communicated exclusively through email correspondence.

The Council demonstrated no measurable effectiveness in training (Q10), as evidenced by its own member's self-assessment confirming zero training initiatives. Despite members being knowledgeable about the RTI Law, the Council conducted no internal training programs for its own membership, let alone broader capacity-building for public authorities. This was corroborated by interviews with information officers, public relations personnel, and department heads across government institutions. Interviews revealed that while some sporadic training activities occurred across various authorities, these were neither regular nor systematic in nature. The trainings identified were primarily focused on sector-specific knowledge and skills, rather than comprehensive RTI implementation or compliance.

The assessment found no evidence of the Council, as a central body, providing formal commentary on legislation or policies affecting the right to information (Q11). However, this does not preclude individual authorities as members (all 15) from potentially engaging with such matters in their own capacities. Neither written reports nor verifiable data exist to confirm or refute such individual-level involvement.

The assessment revealed significant institutional confusion among public officials regarding the central oversight body for RTI implementation. Information officers and department heads variously identified multiple entities as potential reporting authorities, including the Ministry of Finance, the Anti-Corruption Agency, the National Audit Office and the State Administration Office. This ambiguity extended to annual reporting requirements.

KEY RECOMMENDATIONS (*The Council requires full participation from all members in implementing improvements. A timebound action plan must be developed to close identified gaps prior to the next assessment cycle.*)

- Enhance M&E Framework
    - ✓ Introduce dedicated indicators to track implementation of the Law in annual assessments
    - ✓ Standardize reporting to capture currently unmeasured transparency efforts

- Secure Budget Independence
    - ✓ Implement transparent allocation procedures protected from political influence
    - ✓ Establish independent oversight of financial management

- Build Institutional Capacity
    - ✓ Mandate accredited training for Council members (including international benchmarking)
    - ✓ Develop certification programs for staff and public information officers

- Strengthen Transparency
    - ✓ Publish detailed annual reports with compliance data and case outcomes
    - ✓ Ensure full online accessibility of decisions and reports

- Expand Outreach
    - ✓ Launch public awareness campaigns on information rights and complaint mechanisms
    - ✓ Train all relevant officials quarterly, with sector-specific modules

- Systematize Legislative Review
  - ✓ Formalize procedures to analyze and comment on draft laws affecting information rights
  - ✓ Publish expert assessments of proposed legislation

INSTITUTIONAL MEASURES

This is the first of the three assessment areas under the Methodology applicable to the 20 selected public authorities, although this particular assessment area was only applied to 10 of these public authorities. The scoring for this area consisted of 10 objective questions for which scores of one (full compliance) or 0 (no compliance were awarded for each public authority, as well as six evaluative questions which also allowed partial credit (scores of .5) to be awarded. The results from this assessment area show all 16 factors or questions that were considered and the scores of each of the 10 public authorities for each question, as well as the average scores achieved both for each question (i.e. across the 10 authorities interviewed and completed self-assessment questionnaires) and for each authority (i.e. across the 16 questions).

Overall, Mongolia's performance in this assessment yielded average results, receiving a yellow-grade classification (the mid-tier). The country's score of 0.57 places it at the above the average threshold of the yellow-grade range (0.3- 0.66), reflecting some sufficient efforts in meeting transparency standards in institutional measures but indicating that improvement is still needed.

Ten of the 20 authorities were excluded from the assessment of institutional measures. Six were non-responsive bodies that failed to meet in response to interview requests or submit self-assessments. Another three were authorities (Aviation, Prosecutor, and Justice) which did provide self-assessments indicating full/partial compliance on Questions 1, 2, 6, 7, 10, 11, and 16, and expressed interview willingness - though time constraints prevented this. Without complete data for validation or cross-institution comparison, these bodies were ultimately excluded from the Institutional Measures scoring. The NHRC also was not included in Institutional Measures as they are part of assistance process for the evaluation team.

All ten public authorities that provided interviews and self-assessment responses - Ministry of Family, Labour, and Social Protection (MLSP), Communication Regulatory Commission (CRC), General Election Commission (Election), Supreme Court (Supreme), The Capital City Housing Corporation (NOSK), Judicial General Council (JGC), Mongolian Tax Administration (MTA), Orkhon Aimag Governor's Office (Orkhon), Khovd Aimag Governor's Office (Khovd), Bayan Ulgii Aimag Governor's Office (BU) – obtained a yellow grade (scoring between 0.44-0.62). The Bauayn Ulgii aimag's Governor's Office showcased the highest score of 0.69 – a green grade.

While nearly all authorities received yellow-grade overall scores, their question-level performance was notably stronger. In the objective evaluation, seven out of ten questions achieved green-grade scores (0.7-1.0), demonstrating high performance. The remaining three questions received yellow-grade classifications. However, in the qualitative evaluation the picture differs radically, as out of 6 questions 3 received red grades, all scoring 0. (Q13, 14,15). Only Q 12 on experiencing any pressure (official or unofficial) that makes it difficult to do the job properly received a green grade, scoring 1.

		MLSP	BU	Khovd	NOSK	Supreme	Election	CRC	Orkhon	JGC	MTA	Criteria Average	Overall Average
1	Has the PIO been appointed?	1	1	1	1	1	1	1	1	1	1	1	
2	Has the PIO formally been given terms of reference or a job description?	1	1	1	1	1	1	0	1	1	1	0.9	
3	Has the PIO been provided with training?	0	1	0	0	0	1	0	0	0	1	0.39	
4	Has an overall implementation plan or set of standard operating procedures (SOPs) been adopted?	1	1	1	0	1	1	1	0	1	1	0.8	
5	Has a set of guidelines for how to process RTI requests been adopted?	1	1	0	0	1	1	1	0	1	1	0.7	
6	Is it possible to lodge requests electronically? Is it easy to obtain an RTI request form?	1	1	1	1	1	1	1	1	1	0	0.9	
7	Has a person who is different from the PIO been appointed to deal with internal complaints?	0	1	0	1	1	1	1	1	1	1	0.8	
8	Did the public authority publish an annual report for the last two years?	1	1	0	1	1	0	1	1	0	0	0.6	
9	Has the public authority conducted awareness-raising activities over the last year?	1	1	1	1	1	0	0	1	1	0	0.7	
10	Has the public authority put in place any system or taken any action to improve its record management?	0	0	0	1	0	1	1	1	0	0	0.4	
	Average (Objective Evaluation)											0.719	
11	Does the PIO have appropriate qualifications for the job and has he or she been allocated time to do the job?	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	

#	Question												
12	Has the PIO come under any pressure (official or unofficial) that makes it difficult to do the job properly?"	1	1	1	1	1	1	1	1	1	1	1	
13	How strong is the overall implementation plan or SOP?	0	0	0	0	0	0	0	0	0	0	0	
14	How strong is the annual report?	0	0	0	0	0	0	0	0	0	0	0	
15	How extensive are the awareness-raising activities?	0	0	0	0	0	0	0	0	0	0	0	
16	How effective are the measures taken to improve records management?	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	
	Average by Authority	0.59	0.69	0.44	0.56	0.62	0.62	0.56	0.56	0.56	0.5	0.57	
	Overall Grade												**0.57**

Interview and self-assessment responses aligned regarding PIO appointments and equipment availability, but diverged on time allocation. While self-assessments indicated sufficient time, interviews revealed cases of rural authorities facing severe staff shortages, forcing substitutes untrained in RTI to handle RTI duties alongside their primary duties without extra pay.

All sources (100 %) confirmed established complaint mechanisms—including dedicated staff, SOPs, and resolution councils—with standardized reporting systems in place. However, a critical implementation gap emerged: despite these formal structures, every assessed authority (100%) failed to produce any documented evidence of actual RTI complaint handling. No authorities provided verifiable complaint records, case numbers, or statistical reports on RTI requests or RTI complaints, suggesting systemic failures in transparency and accountability despite proper institutional frameworks.

Interview responses (Q 3) reveal that existing trainings predominantly cover general public service skills, sector-specific knowledge, and public relations - with negligible focus on RTI-specific competencies like law provisions, request handling, or compliance reporting. This content gap creates fundamental challenges in interpreting officials' training claims, as completion rates cannot be equated with RTI preparedness. This discrepancy, plus the near-total absence of RTI-specific training content, undermines all competency assumptions.

Question 12's findings reveal unanimous agreement across all data sources - including both interview participants and self-assessment respondents - that no political or institutional pressure interferes with the performance of RTI-related duties. However, the categorical nature of these responses (100% negative) warrants careful interpretation. While potentially indicating robust institutional safeguards, such uniform reporting could also reflect: (1) respondents' limited awareness of subtle pressures, (2) reluctance to disclose sensitive concerns, or (3) methodological limitations in

detecting indirect forms of interference. These factors highlight the need for complementary verification mechanisms beyond self-reported data. Media representatives reported perceived pressure from senior officials, particularly at local levels, where all information releases reportedly require higher-level approval. The lack of detailed standard operating procedures (SOPs) creates ambiguity for information officers in determining whether they are receiving legitimate directives or undue pressure to withhold information.

The data shows strong consensus regarding interdepartmental cooperation in information disclosure processes. Fully 92% of Self-Assessment 2 respondents confirmed active collaboration within their organizations, with 100% acknowledging instances where other staff were engaged to support information release. This suggests robust institutional mechanisms for cross-functional coordination on RTI implementation.

Question	Percentage of Respondents Answering in the Affirmative
1. It is easy to make a request?	100%
2. Can this be done electronically?	92.31%
3. Can this be done in person?	100%
4. Can this be done by post?	92.31%
5. Are the PIO's contacts posted online?	92.31%
6. Are the PIO's contacts available at the office?	100%
7. Do you need to use the form to submit a request?	30.77%
8. Is the form for making requests easily accessible?	84.62%
9. Do you need to prove citizenship to make a request?	38.46%

The E-Academy[11] was launched in January 2022 to digitalize public services, develop core e-government systems and subsystems, and enhance digital literacy for both civil servants and the general public. Aimag officials reported collaborating with the E-Academy, acknowledging its role as the official monitoring and evaluation mechanism for digital initiatives.

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[11] https://ema.gov.mn/eng/

Request submission methods and channels remain fully accessible—citizens may submit information requests through any format without restriction. Persons with disabilities or those facing difficulties in submitting requests receive dedicated assistance. Most institutions have now appointed Public Information Officers with clearly defined job descriptions, marking significant progress.

Although respondents in the Self-Assessment 2 questionnaires reported positively on training for Public Information Officers, no evidence verifies that this training is consistent or standardized across programs. Interview data reveal persistent inconsistencies and inadequacies, with training delivered irregularly and lacking standardized content or curriculum. Current capacity-building efforts are limited to brief morning meeting instructions and ad-hoc email guidance from the Ministry of Digital Development and Communications—falling far short of a structured training framework.

Currently, there is no standardized operating procedure (SOP) detailing how to receive, register, and respond to information requests. Question 13 specifically assessed the strength of implementation plans/SOPs. All responses indicated the current framework is inadequate, resulting in a uniform red-grade score of 0.

Instead of standardized procedures, each organization handles requests through internal procedures, ad-hoc processes, creating inconsistencies and operational challenges. Implementing a mandatory, uniform SOP for all public bodies would not only improve transparency but also significantly reduce opportunities for political pressure—even if such influence remains formally unacknowledged. While PIOs reported no direct pressure from authorities, the absence of whistleblower protections or legal safeguards makes it impossible to confirm whether such influence truly doesn't exist. One interviewee specifically highlighted the need for standardized operating procedures (SOPs) to both shield PIOs from potential pressure and establish formal protection mechanisms—a gap that leaves the system vulnerable to unacknowledged interference.

Together, these findings reveal a paradox: Official denials of pressure contrast sharply with empirical indicators of dysfunction. Without whistleblower laws or SOPs to insulate PIOs, the system's reliance on self-reporting risks obscuring real challenges to information access. In the absence of a standardized operating procedure (SOP), final decisions on releasing information rest solely with senior authority figures.

Government officials' self-assessments and interviews painted a picture of strong transparency, but this stood in stark contrast to civil society groups, journalists, and complainants who reported persistent difficulties in obtaining information. Evidence from other stakeholders paints a concerning picture. Interviews with NGOs and media, coupled with 10 organizations refusing to engage with assessments and a 42% mute refusal rate (25 of 59 RTI requests ignored), point to systemic transparency issues. These patterns persist alongside poor proactive disclosure practices, suggesting structural rather than isolated problems.

While all institutions provide public access to PIO/PR contacts, MLSP stands out by publicly disclosing its full request procedure - a practice reported to substantially improve processing efficiency. While public relations contacts are available, other officials remain inaccessible for direct

communication. Requests can be submitted through multiple channels (written, verbal, electronic) without formal restrictions, but the process lacks transparency beyond initial submission. Requesters are left uninformed—receiving no acknowledgments, progress updates, or clarity on how their requests are processed. This opacity creates a systemic "fog," undermining trust in the system.

Complaints are typically managed by designated officers or specialized Complaint Working Groups within authorities. Channels for submitting complaints include national hotlines (12-12 or 1111)[12], though locals often prefer in-person submissions. Some NGOs have established local cooperation agreements (MIOs) with public bodies, yet officials frequently resist disclosing information—suggesting potential political pressure. In the absence of a standardized operating procedure (SOP), final decisions on releasing information rest solely with senior authority figures.

"Citizens are forced to make costly, time-consuming trips just to file complaints - a system that effectively silences vulnerable populations and discourages legitimate grievances" was noted by a complainant interview. The uncertainty of responses, delays, and vagueness of responses push people to be in person to handle such situations, which is itself creating disproportionate accessibility challenges - particularly for rural residents and working populations.

RTI Law awareness efforts stalled after initial handouts/presentations. Ongoing advocacy, annual reports, and public education are missing. This creates a dangerous gap between legal rights and public knowledge, reducing transparency reforms to mere symbolism.

KEY RECOMMENDATIONS

- Train & Empower Information Officers
  - ✓ Mandate standardized RTI training with certification
  - ✓ Cover in training programs request processing, exemptions, and public communication
- Enforce Compliance
  - ✓ Require all agencies to adopt detailed SOPs with:
    - • Clear response workflows
    - • Defined timelines and appeals processes
- Boost Transparency
  - ✓ Publish annual reports with request/refusal data
  - ✓ Launch public dashboards tracking performance

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[12] https://www.11-11.mn/

- Engage Citizens
  - ✓ Run targeted campaigns (community radio, social media)
  - ✓ Create multilingual request guides
- Modernize Systems
  - ✓ Deploy digital records management for instant retrieval
  - ✓ Automate request tracking

Act Now: Start with training/SOPs (3-6 months), then scale reforms.

PROACTIVE DISCLOSURE

Proactive disclosure refers to the practice of making information publicly available without waiting for a specific request. Fueled largely by advances in technology, public authorities around the world are now proactively disclosing significantly more information—primarily through online platforms—than ever before.

For the purposes of grading proactive disclosure, the 20 public authorities selected for assessment were assigned Substantive Issues scores, which were based on an assessment of their disclosure of five categories of information (covering 68 kinds of information required by the law), with scores ranging from Full (1), Full to Partial (.75), Partial (.5), Partial to None (.25) or None (0). In assigning these scores, consideration given to:

- Whether the available information was complete in the sense of including everything in the relevant category

- How easy the information was to find

- How up to date the information was, taking into account how frequently that type of information changes

A second part of the grading process assigned scores to each public authority of strong (1), partial (.5) or weak (0) compliance for five other issues relevant to proactive disclosure:

1. The extent to which the website is WCAG 2.1 compliant.

2. The extent of the efforts the public authority takes to disseminate information other than simply via its website.

3. The extent to which the public authority makes use of social media and other means to draw the attention of the public to its proactive publications and to disseminate information proactively.

4. The extent to which the public authority makes an effort to create understandable versions of at least the most important documents (such as its budget).

5. The extent to which it is reasonably easy to find specific information from among all of the information that is being published online.

The overall proactive disclosure score for each public authority was tabulated by taking 75 percent of the average score for the public authority across the Substantive Issues and 25 percent of their average score on the Other Issues. The main findings from this part of the assessment are presented in the below table. The table includes average scores for each information category and issue across all authorities, as well as average scores for each authority—broken down by category, by issue, as well as overall scores per authority (calculated according to the above formula). The categories chosen were derived from Article 8 of the Law on Transparency of Public Information specifically details Open information. Article 8.8. states the person responsible for the information shall use the website, bulletin board, and other means of information to provide the public with the information to be kept transparent and open as specified in Sections 8.2, 8.3, 8.4, 8.5, and 8.6 of this law. Sections 8.2, 8.3, 8.4, 8.5, and 8.6 require in total 68 pieces of information to be open to public, starting from the organizational structure, mission, HR information, financial reporting, procurements information, legislations, procedures and other. Article 8.12. specifically states that regardless of the use of other means of information, the organization must operate the website and bulletin board and fully meet the conditions for viewing open information on the website.

The results in this area remain average, with Mongolia receiving an overall yellow grade—though at the lower end of that range, scoring 0.3956 (within the yellow grade band of 0.34 to 0.66). Only two public authorities—the Aviation and CRC—achieved green grades. The performance of the Aviation authority is impressive (the highest in substantive issues, scoring 0.95), likely due to the need to comply with international standards and requirements to operate effectively. Eleven public authorities received a yellow grade, with scores ranging between 0.45 and 0.65. The remaining seven authorities—NOSK, MNB, MPP, MTX, TTT, Bulgan and Tuv —were graded red, with scores ranging between 0.05 and 0.24. Among them, the Mongolian Television Association (MTX) and Bulgan Aimag Rashaan soum Local Development Fund (Bulgan) scored the lowest, each falling between .05 and 0.09, with the Mongolian People's Party (MPP) only slightly ahead, with a score of 0.1.

When focusing specifically on the categories of information published, the overall average across public authorities resulted in a weak yellow grade. This suggests that, while some efforts have been made to disclose key types of information proactively, significant gaps remain in both the consistency and completeness of that disclosure. The result indicates clear room for improvement, particularly in ensuring that all required

categories are regularly updated and easily accessible to the public. Nevertheless, the outcome is moderately respectable, reflecting at least a baseline commitment to transparency in certain areas.

№	Substantive Issues	NHRC	MLSP	Justice	CRC	Election	Aviation	Prosecutor	Supreme	NOSK	JGC	MTA	MNB	MPP	MTX	TTT	Orkhon	Khovd	BU	Bulgan	Tuv	Total average
1	Information about its mandate, strategic activities, and organizational structure (as specified in provisions 8.2.1 to 8.2.10)	0.75	0.75	0.75	0.75	0.5	1	0.5	0.5	0	0.5	0.5	0	0	0	0	0.75	0.75	0.75	0	0	0.44
2	Human resource information (as specified in provisions 8.3.1 to 8.3.6).	1	0.75	0.75	1	0.75	1	0	0.75	0	0.5	1	0	0	0	0	0.5	0	0.75	0	0	0.44
3	Information on budget, finance, and procurement activities (as specified in provisions 8.4.1 to 8.4.27)	0.75	0.5	0.75	0.75	0.75	1	0.75	0.5	0	0.5	0.75	0	0	0	0	0.75	0.5	0.75	0.25	0.25	0.48
4	Information on services provided within the scope of legally mandated functions (as specified in provisions 8.5.1 to 8.5.2)	0	0.25	1	0.75	0	0.75	0	1	0.75	0.5	1	0	0	0	0	0	0.25	0.25	0	0	0.33
5	Other information within the scope of its responsibilities (as specified in provisions 8.6.1 to 8.6.21)	0	0	0.25	0.5	0	1	0.5	0	0	0	0	0	0	0	0	0.5	0.5	0.5	0	0	0.19
	Average Substantive Issues	**0.5**	**0.45**	**0.7**	**0.75**	**0.4**	**0.95**	**0.35**	**0.55**	**0.15**	**0.4**	**0.65**	**0**	**0**	**0**	**0**	**0.5**	**0.4**	**0.6**	**0.05**	**0.05**	**0.37**
	Other issues																					
	Is the website WCAG 2.1 compliant?	0.5	0.5	0.5	0.5	1	0	0.5	0	0	0	0	0	0	0	0	0	0.5	0	0	0	0.20
	Efforts to disseminate information other than simply via its website , for example Information board/ information bulletin	0.5	0.5	0	0.5	0	0.5	0	0.5	0.5	0.5	0.5	0.5	0	0	0.5	0.5	0.5	0	0	0.5	0.33
	Use of social media/smartphone apps to highlight proactive publication (Facebook)	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	0	1	0	0.5	1	0.83
	Understandable versions of the most important documents (e.g. budget)	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.50
	Ease of finding information	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0..5	0.5	0.5	0	0.5	0.48
	Average Other Issues	0.6	0.6	0.5	0.6	0.6	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.4	0.2	0.5	0.3	0.6	0.2	0.2	0.5	0.47
	Total Score by Authority	0.53	0.49	0.65	0.71	0.45	0.84	0.39	0.54	0.24	0.43	0.61	0.13	0.10	0.05	0.13	0.45	0.45	0.50	0.09	0.16	
																						0.40

On average, the 20 assessed organizations published roughly 37% of the 68 legally required types of information. In total, approximately 1,300 individual items were reviewed across their websites. A notable strength was the publication of financial information via dedicated *Glass Account* links, which is a core legal requirement and has significantly contributed to enhancing transparency.

During site visits, information boards were found to be largely ineffective across the 20 organizations assessed. Seven of the organizations had no information boards at all. Among them, the National Broadcasting organization did have a board, but it was completely empty. Of the 13 organizations that did have information boards, the content was largely insufficient. In most cases, only general information required under Article 8.2—such as the organization's mission and strategy—was displayed, along with one or two basic announcements. A few rural organizations posted some financial data, reports, procurement notices, or limited human resource information. However, the presence of an information board alone did not ensure the availability of meaningful or actionable information for public monitoring or transparency purposes. As noted by interview respondents from civil society and the media, most of the information available on websites and information boards is overly general and lacks the detail necessary for effective monitoring. In many cases, the information is either unusable or irrelevant for accountability purposes. Moreover, the reliability of the information provided is not guaranteed, as there are no verification mechanisms in place. This further undermines its usefulness for oversight and public accountability. It was found that the Ministry of Justice, acting as the Oversight Body, had no information board.

Only the Election authority complied with WCAG 2.1 standards, while the remaining public authorities failed to upgrade their websites to meet accessibility requirements—only a few implemented minimal features to assist users with specific needs (zooming option). At the same time the General Election Commission (Election) has discontinued the use of physical information boards, erroneously assuming online availability fulfills all obligations. However, Article 8.12 explicitly requires maintaining both physical and digital information displays.

Social media is primarily used as a tool for promotion and public relations rather than for meaningful transparency or accountability. Platforms such as Facebook, YouTube, Twitter, and Instagram were commonly mentioned, with content focused mainly on advertising, advocacy, and raising awareness about organizational services. Large display screens—placed in public squares or inside buildings—are often used to show promotional videos, short reels, and informational content aimed at informing the public about institutional activities.

In rural areas, local media such as television and radio remain widely used, while newspapers and specific interview segments are also employed for promotional purposes.

For information dissemination, some printed materials are used. For example, the Ministry of Finance publishes an annual citizen-friendly budget report, and tax authorities have printed a booklet in an accessible format for people with visual impairments. However, many posters and information boards remain overly general and are often difficult for the public to understand or use effectively.

The primary language used across public authority websites is Mongolian. While some websites offer an English version, the content available in English is typically limited to general information, with most detailed or updated content provided only in Mongolian. Some limited information is provided in minority languages such as Uriankhai and Kazakh (Bayan Ulgii aimag), but this is minimal, and the website remains exclusively in Mongolian.

Regarding gender-disaggregated information, it is generally not available on all assessed websites. Gender is occasionally reflected in statistical reports, particularly in some health-related datasets—but there is a lack of substantive information or analysis from a gender perspective.

KEY RECOMMENDATIONS

While the Government of Mongolia has made promising commitments to become a "Digital Nation" over the next five years—including major policy and structural changes such as the launch of the E-Mongolia System and the Government Online Platform in October 2020 (offering over 660 public services from 61 government organizations as of July 2022)—there are still notable challenges in how public authorities share information with the public. Despite the progress in digital service delivery, the use of these tools for meaningful public communication and transparency remains limited. To help strengthen this area, the following recommendations are suggested:

- All public authorities should proactively disclose the full list of information categories outlined in Article 8 of the Law. Particular attention should be given to publicly owned entities, associations, political parties, and local bodies in remote areas—such as soum development funds—in future efforts to strengthen transparency.
- All public authorities should ensure their websites comply with WCAG 2.1 standards to improve accessibility for users and promote inclusive digital access.
- Public authorities should actively use information boards and diversify communication channels to ensure broader access, especially for those without internet. Social media and other tools should be used not just for promotion, but to share practical, relevant information.
- Public authorities should adopt user-friendly and standardized website designs to make information easy to find and navigate. This would help avoid vague content, ensure regular updates, and improve transparency by emphasizing quality and relevance for public monitoring.
- To improve equitable access, the dedicated funding for multilingual content development, mandatory language accessibility standards for all public portals, and targeted support for authorities in linguistically diverse regions is recommended.

REACTIVE DISCLOSURE

Reactive disclosure refers to how public authorities respond to requests for information submitted by the public. This aspect was primarily assessed by submitting three actual information requests to each authority (with the exception of Elections, which received two) and monitoring their responses.

For the purposes of grading, each public authority was assigned a processing score, which was composed of three sub-scores, each evaluated on a binary Yes (1 point) or No (0 points) basis:

- Receipt score: Whether a receipt was provided to the requester.

- Timeliness score: Whether the request was responded to within the 21-day deadline limit, including any extensions that complied with legal rules and were reasonable.

- Fee score: Whether any charged fee adhered to the legal requirements.

The average of these three sub-scores provided the processing score for each request.

The results score evaluated the outcome of the request based on the quality and completeness of the response:

- Full disclosure: Awarded 1 point for valid and complete information disclosure.

- Oral refusals or mute refusals (failure to respond within the deadline) and cases where it was not possible to lodge the RTI request: 0 points (considered never valid).

- Other responses (e.g., written refusal, partial disclosure, referral to another authority, or incomplete answers) were assessed based on their validity:

  - LIKELY valid: 1 point.

  - MAYBE valid: 0.5 points.

  - UNLIKELY valid: 0 points.

The overall score for each request was calculated by adding one-third of the processing score and two-thirds of the result score. The final score for each public authority was determined by averaging the scores across all RTI requests submitted to that authority.

The results of this exercise are presented in the below table which outlines key indicators for each request—such as whether a receipt was issued, whether the response was timely, and whether any fees were charged (i.e. processing-related issues)—along with the overall outcome of each request.

This area of assessment yielded the strong results overall, with Mongolia receiving a solid yellow grade and an average score of 0.55. The highest score is 0.87, which was achieved by the National Human Rights Commission (NHRC). However, it should be mentioned that as the NHRC was involved in the assessment process, it may not have been a truly blind test request exercise for that one public authority. The Prosecutor's Office scored the second highest score, 0.74. Other strong performers—earning green grades—include the Aviation Authority (0.70).

At the other end of the spectrum, eight authorities out of 20 received a red-grade, where Bayankhangai Soum Local Development Fund (Tuv) and Bulgan and MTX received the lowest scores, 0.11, indicating that these authorities largely failed to respond to information requests.

A total of 59 information requests—via letter, email, and phone—were sent to 20 organizations, ranging from simple citizen inquiries to more detailed questions from organizations. All requests concerned non-confidential, public information. Only 16 responses fully answered the questions.

The following table shows the average scores for the four criteria which factored in the grading—timeliness, completeness, acknowledgment of receipt, and whether a fee was charged—as well as the overall grade for Mongolia as a whole. The below table shows the results.

0.43	0.41	1	0.33	0.42
Receipt	Timely	Fee free	Request result	Overall Score

The overall processing score appears strong, largely because **none of the public authorities charged a fee** for responding to requests. However, this is somewhat misleading, as **most did not provide substantive information**—particularly none that would require effort such as retrieving archival materials or compiling data. As a result, the perfect score on this indicator does not reflect the actual quality or completeness of responses. Only 41% of requests received timely responses. While phone acknowledgements and email confirmations were counted as valid receipts, written requests delivered in person did not receive official dated acknowledgements, relying instead on internal journal entries. As such, the receipt data may overstate the actual level of procedural compliance

Public Authority	Question	Date Submitted (D-M-Y)	How filed	Receipt?	Receipt score	Date of response (D-M-Y)	Timely score	Fee Charged	Fee score	Process score	Result	Result score	Final score	Score by authority	Grade by authority
NHRC	Q1	02.20.2025	Hand	Yes	1	20.02.2025	1	0	1	1	Complete	1	1.00	0.87	
	Q2	25.02.2025	Email	Yes	0.5	26.02.2025	1	0	1	0.833	Incomplete	0.5	0.611		
	Q3	21.03.2025	Phone	Yes	1	21.03.2025	1	0	1	1	Complete	1	1.00		
MLSP	Q1	02.20.2025	Hand	Yes	1	03.09.2025	0	0	1	0.667	Complete	1	0.889	0.37	
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		
	Q3	21.03.2025	Phone	No	0		0	0	1	0.333	Mute	0	0.111		
Justice	Q1	01.04.2025	Hand	Yes	1	17.04.2025	0	0	1	0.667	Complete	0	0.222	0.44	
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		
	Q3	21.03.2025	Phone	Yes	1	21.03.2025	1	0	1	1	Complete	1	1.00		
CRC	Q1	02.20.2025	Hand	Yes	1	24.02.2025	1	0	1	1	Incomplete	0.5	0.667	0.59	
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		
	Q3	21.03.2025	Phone	Yes	1	21.03.2025	1	0	1	1	Complete	1	1.00		
Election	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111	0.56	
	Q3	19.03.2025	Phone	Yes	1	19.03.2025	1	0	1	1	Complete	1	1.00		
Aviation	Q1	02.20.2025	Hand	Yes	1	23.02.2025	1	0	1	1	Complete	1	1.00	0.70	
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		
	Q3	21.03.2025	Phone	Yes	1	21.03.2025	1	0	1	1	Complete	1	1.00		
Prosecutor	Q1	02.20.2025	Hand	Yes	1	01.04.2025	0	0	1	0.667	Incomplete	0.5	0.556	0.74	
	Q2	25.02.2025	Email	Yes	1	26.02.2025	1	0	1	1	Incomplete	0.5	0.667		

	Q3	18.03.2025	Phone	Yes	1	18.03.2025	1	0	1	1	Complete	1	1.00		🟩
Supreme	Q1	02.20.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111		🟨
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111	0.41	🟨
	Q3	18.03.2025	Phone	Yes	1	18.03.2025	1	0	1	1	Complete	1	1.00		🟨
NOSK	Q1	02.20.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111		🟨
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111	0.41	🟨
	Q3	18.03.2025	Phone	Yes	1	18.03.2025	1	0	1	1	Complete	1	1.00		🟨
JGC	Q1	02.20.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111		🟨
	Q2	26.02.2025	Email	Yes	1	26.02.2025	1	0	1	1	Incomplete	0.5	0.667	0.59	🟨
	Q3	18.03.2025	Phone	Yes	1	18.03.2025	1	0	1	1	Complete	1	1.00		🟨
MTA	Q1	02.20.2025	Hand	Yes	1	10.03.2025	1	0	1	1	Complete	1	1.00		🟩
	Q2	26.02.2025	Email	No	0		0	0	1	.11	Mute	0	.111	0.70	🟩
	Q3	18.03.2025	Phone	Yes	1	18.03.2025	1	0	1	1	Complete	1	1.00		🟩
MNB	Q1	02.20.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q2	26.02.2025	Email	Yes	1	26.02.2025	1	0	1	0.333	Incomplete	0.5	0.667	0.30	🟥
	Q3	19.03.2025	Phone	No	0		0	0	1	0.333	Mute	0	0.111		🟥
MPP	Q1	02.20.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q2	26.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111	0.19	🟥
	Q3	18.03.2025	Phone	Yes	1	18.03.2025	1	0	1	1	Oral refusal	0	0.333		🟥
MTX	Q1	11.03.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q2	26.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111	0.11	🟥
	Q3	18.03.2025	Phone	No	0		0	0	1	0.333	Mute	0	0.111		🟥
TTT	Q1	13.03.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111	0.19	🟥

Area	Q	Date	Method	Y/N							Status			Grade	
	Q2	26.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q3	19.03.2025	Phone	Yes	1	19.03.2025	1	0	1	1	Oral refusal	0	0.333		🟥
Orkhon	Q1	20.02.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111	0.30	🟥
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q3	21.03.2025	Phone	Yes	1	21.03.2025	1	0	1	1	Incomplete	0.5	0.666		🟥
Khovd	Q1	17.02.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111	0.15	🟥
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q3	21.03.2025	Phone	Yes	0	18.02.2025	1	0	1	0.666	Oral refusal	0	0.222		🟥
BU	Q1	10.03.2025	Hand	Yes	1	12.03.2025	1	0	1	1	Complete	1	1.00	0.70	🟩
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		🟩
	Q3	21.03.2025	Phone	Yes	1	21.03.2025	1	0	1	1	Complete	1	1.00		🟩
Bulgan	Q1	02.20.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111	0.111	🟥
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q3	19.03.2025	Phone	No	0		0	0	1	0.333	Mute	0	0.111		🟥
Tuv	Q1	11.03.2025	Hand	No	0		0	0	1	0.333	Mute	0	0.111	0.111	🟥
	Q2	25.02.2025	Email	No	0		0	0	1	0.333	Mute	0	0.111		🟥
	Q3	19.03.2025	Phone	No	0		0	0	1	0.333	Mute	0	0.111		🟥
Average Score					0.43		0.41		1	0.61		0.33			
Grade by Area					🟨		🟨		🟩			🟥			
Final Overall Grade														.42	

All respondents, public officials and civil society representatives, noted that there are no strict requirements regarding the format of information requests, which is viewed positively—requests submitted in any format are generally accepted. In rural areas, people often prefer to make requests in person. However, both government officials and representatives from NGOs and the media stated that there is no official system for issuing receipts or acknowledgments of request submissions.

100% of public officials confirmed that they provide immediate assistance to requesters facing difficulties, such as challenges in writing requests or for individuals with disabilities, including those using wheelchairs. Civil society respondents also corroborated this, sharing firsthand observations of officials offering help with the request-writing process.

Digital requests are assumed to be automatically registered, and phone inquiries are acknowledged informally. While written or in-person requests are recorded in internal logs or journals, there is no formal acknowledgment provided to the requester. All authorities typically require basic contact details—such as a phone number or return address—and organizational requests may also require a signature or stamp.

Media respondents expressed concern about a lack of responsiveness from authorities, noting a general reluctance to engage. Officials, on the other hand, reported that they rarely reject requests and often begin processing them immediately, suggesting they see no need for formal acknowledgments.

Summary of Unfulfilled or Partially Fulfilled Requests

Result	Frequency
1. Mute refusal (no response at all)	32
2.Acknowledgment only	0
3.Incomplete information provided	7
4.Oral refusal	3

As shown in the above table, 32 out of 59 information requests received no response at all—effectively remaining unanswered or "muted." However, phone requests, particularly those made by individual citizens, were often processed quickly and informally acknowledged. The prevalence of **mute refusals**—a complete failure to respond to information requests—constitutes one of the **most fundamental violations of the**

right to information. Such disregard not only undermines transparency but also erodes public trust, making this outcome particularly disheartening. Media and civil society respondents emphasized that refusals are often justified through improper applications of legal provisions, with authorities frequently invoking or broadly interpreting laws without clear explanation or legal grounding.

In one instance, the Election Authority returned a request, citing an incorrect name of the official addressed. Yet upon verification, the same official's name and contact details as listed on the request were still listed on the authority's website. Interviews further indicated that refusals sometimes occur when the name or title of the recipient does not exactly match, and that frequent changes in institutional names and structures may be contributing to confusion and difficulty for requesters. Refusals directed at media representatives are often **delivered verbally**, lacking formal documentation. At the same time, authorities tend to demand more formal procedures from the media, such as **official letters bearing organizational stamps**, before responding to inquiries—creating a double standard that hampers media access to information.

Interviews with public officials and their self-assessment responses reflect a **strong belief in their timely and effective information disclosure**, with many claiming that refusals are rare. However, in reality, **our assessment revealed that over half of the information requests received no response at all**, highlighting a significant gap between perception and practice.

During an interview, a complainant reported serious transparency concerns: after submitting three written requests for details on the aimag governor's activities, authorities denied disclosure, citing 'confidential private data'—namely, contracts between the governor and private companies.

Larger agencies tend to have better response times, as confirmed by respondents who noted from previous experiences that lower-level public bodies, such as district and khoroo authorities, often ignore or remain silent in response to requests. This issue is also prevalent among political parties and publicly owned enterprises.

Most public authorities reported no language-related barriers, stating they accept and process requests in any language. In comparison, there is an interesting case of Bayan-Ulgii aimag, where only Mongolian is used, despite the region's significant Kazakh-speaking population. Notably, local authorities in Bayan-Ulgii require that public information requests be submitted in Mongolian (with translation if original request in Kazakh), whereas city-level organizations and other aimags do not impose such language restrictions.

KEY RECOMMENDATIONS

The freedom to choose the channel and format for submitting information requests is commendable, reflecting a flexible and inclusive approach. However, confirmation of receipt remains inconsistent and needs significant improvement. Given that the core purpose of right to information legislation is to enable public access, gaps in this area are especially troubling. These issues likely reflect broader institutional weaknesses. Notably,

only about half of the 20 public authorities assessed responded to interview and self-assessment requests, making it unclear whether a Public Information Officer (PIO) has been formally appointed in all cases. Even where appointments exist, many PIOs lack proper training or qualifications, undermining the effective implementation of the law.

- Eliminating Deficient Responses
✓ Conduct internal audits to identify patterns of mute/verbal refusals and incomplete responses.
✓ Implement mandatory training for staff on proper request handling.
✓ Introduce automated tracking to flag non-compliant responses for review.

- Monitoring:
✓ Quarterly reporting on refusal rates and response completeness.

- Mandatory Receipt Issuance
✓ Develop standardized receipt templates (digital and paper) – with unique tracking number, expected response timeline, PIO contact details
✓ Integrate receipt generation into all request channels (email auto-replies, SMS confirmations, etc.).

- Transparent Denial Justifications
✓ Create a standardized refusal template but one which requires PIOs to detail the specific reasons for refusals in any given case with reference to the applicable legislative provision.
✓ Publish anonymized refusal logs quarterly.

- Accountability Measures
✓ Non-compliance penalties: Deduct performance metrics from annual evaluations.
✓ Public reporting: Publish authority rankings based on response quality/timeliness.
✓ Oversight: Central Body to conduct spot checks and resolve appeals.

- Accessibility Measures

✓ Targeted support for authorities in linguistically diverse regions is recommended.

Timeline:

Pilot with high-volume agencies (3 months), then nationwide rollout (6 months).
This ensures concrete, measurable progress while closing loopholes for non-compliance.

FINAL GRADE

Following the four standard assessment areas (Central/Institutional Measures, Proactive/Reactive Disclosure), this conclusion presents Mongolia's comprehensive national score and colour grades alongside individual authority scores and colour grades. In the case of the individual authorities' scores, the average scores consist of the averages of their scores on Institutional Measures, Proactive Disclosure and Reactive Disclosure except for those public authorities for which no Institutional Measures score was awarded. For those public authorities, only scores for Proactive Disclosure and Reactive Disclosure factored into the averaging.

The overall results for Mongolia

Area	Central Measures	Institutional Measures	Proactive Disclosure	Reactive Disclosure	Average
Result	0.23	0.57	0.40	0.42	**0.41**
Grade	🟥	🟨	🟨	🟨	🟨

Overall Results by Public Authority

Public Authority	Institutional Measures	Proactive Disclosure	Reactive Disclosure	Average	Grade
National Human Rights Commission	N/A	0.52	0.87	0.70	🟩
Ministry of Family, Labour and Social Protection	0.59	0.49	0.37	0.48	🟨
Ministry of Justice and Home Affairs	N/A	0.65	0.44	0.55	🟨
Communications Regulatory Commission	0.56	0.71	0.59	0.62	🟨
General Election Commission	0.62	0.45	0.56	0.54	🟨
The Civil Aviation Authority	N/A	0.84	0.70	0.77	🟩
The State General Prosecutor Office	N/A	0.39	0.74	0.58	🟨
Supreme Court	0.62	0.54	0.41	0.52	🟨
The Capital City Housing Corporation	0.56	0.24	0.41	0.40	🟨
Judicial General Council	0.56	0.43	0.59	0.53	🟨
Mongolian Tax Administration	0.5	0.61	0.70	0.60	🟨
Mongolian National Public Radio and Television	N/A	0.13	0.30	0.22	🟥
Mongolian People's Party	N/A	0.10	0.19	0.15	🟥
Mongolian Television Association	N/A	0.05	0.11	0.08	🟥
Tavan Tolgoi Tulsh LLC	N/A	0.13	0.19	0.16	🟥
Orkhon Aimag Governor's Office	0.56	0.45	0.30	0.44	🟨
Khovd Aimag Governor's Office	0.44	0.45	0.30	0.40	🟥
Bayan Ulgii Aimag Governor's Office	0.69	0.50	0.70	0.63	🟨
Bulgan Aimag Rashaan soum Local Development Fund	N/A	0.09	0.11	0.10	🟥

Tuv Aimag Bayankhangai soum Local Development Fund	N/A	0.16	0.11	0.14	████

CONCLUSION

Mongolia's legal framework for the right to information demonstrates a strong commitment to transparency through constitutional provisions and supporting legislation. The 2021 amendments to the Law on Public Information Transparency represent important progress in clarifying procedures and expanding coverage. However, this comprehensive assessment reveals significant implementation gaps that have resulted in an overall "low-yellow" performance rating, indicating systemic weaknesses that require urgent attention.

The evaluation identified several critical challenges hindering effective RTI implementation. Performance varies substantially across public authorities, with only two of twenty assessed bodies achieving green-grade scores, while seven fell into the red-grade category. Particularly concerning is the weak performance of state-owned enterprises, local development funds, and some provincial offices. Structural deficiencies are evident in the lack of standardized protocols for information requests, inconsistent proactive disclosure practices, and inadequate oversight mechanisms. These operational shortcomings are compounded by the Central Body's failure to establish robust evaluation systems or enforce transparency recommendations consistently.

Geographic disparities further complicate implementation, with rural areas facing particular challenges in both accessing and providing information. The continued reliance on in-person complaint systems creates disproportionate barriers for citizens outside urban centers, while language accessibility remains inconsistent in regions with minority populations. These practical obstacles undermine the law's intended benefits and perpetuate inequalities in information access.

To address these challenges, Mongolia must prioritize several key reforms. The Central Body requires strengthened authority and resources to fulfill its oversight role effectively, including powers to mandate compliance and enforce standards across all covered entities. Standardized training programs for information officers, coupled with clear procedural guidelines, would improve consistency in request handling. Enhanced reporting requirements, including the publication of complaint statistics and appeal decisions, would increase accountability and enable better monitoring of implementation progress.

Technological modernization represents another crucial area for improvement. Developing digital platforms for information requests and complaints would significantly improve accessibility, particularly for rural populations. Simultaneously, public awareness campaigns are needed to ensure citizens understand and can exercise their rights effectively. These measures should be complemented by robust protections against retaliatory actions and explicit guarantees for whistleblowers.

The assessment results demonstrate that while Mongolia has established a solid legal foundation for RTI, meaningful implementation requires sustained political commitment and adequate resourcing. Addressing the identified gaps will demand coordinated action across government institutions, civil society, and oversight bodies. By prioritizing these reforms, Mongolia can transform its RTI framework from formal compliance to practical effectiveness, ensuring genuine transparency and accountability that serves all citizens equally.

Looking forward, regular independent evaluations should be institutionalized to monitor progress and identify emerging challenges. The current assessment provides a baseline against which future improvements can be measured. With concerted effort and continued refinement of both policies and practices, Mongolia has the opportunity to establish itself as a regional leader in information transparency and good governance. The realization of this potential depends on translating legal provisions into consistent, day-to-day practice across all levels of government and public institutions.

ANNEX 1 INTERVIEWS

№	Public authorities /enterprises/association/political parties	
1	Communications Regulatory Commission (CRC)	Public information data specialists
2	Bayan Ulgii Aimag Governor's Office (BU)	Head of Public administration, management department
3	Orkhon Aimag Governor's Office (Orkhon)	Specialist in charge of digitalization, IT development and implementation
4	Khovd Aimag Governor's Office (Khovd),	Governor's office specialist
5	Mongolian Tax Administration (MTA),	Tax inspector, Public Relations Centre
6	Ministry of Family, Labour and Social Protection (MLSP),	Specialist, Department of Digitalization, Big Data; specialist of Department of Monitoring and Evaluation, internal audit
7	Supreme Court (Supreme)	Public administration, management department , press representative
8	General Election Commission (Election)	Public information data specialists
9	Judicial General Council (JGC)	Head of Information Centre
10	NOSK	Head of Legal Department
	Media/Journalists	
1	Arkhangai aimag media	Amarzaya
2	GOGO news site	Adyasuren
3	Zuuny Medee newspaper	Batsaikhan
	Civil Society Organizations, representatives	
1	Mongolian Environment Council	M.Chinzorig
2	Administrative New Initiatives NGO	Tserenpurev
3	Transparency Initiative NGO	D. Tserenjav
4	National Complex Development Centre	M.Enkhbadral
	Complainant	
1	Local journalists' alliance	Sharav

ANNEX 2 LIST OF REACTIVE REQUESTS

#	Organization	Submission method/sender	Summary of the request content
1	NHRC	Letter / NGO	Number of complaints related to violations of freedom of expression and access to information (from Jan 1, 2024 to Feb 1, 2025) under Clauses 6.1.2 and 8.1
		Email /	Implementation report of the organization's development policy and public events
		Phone /	What legal safeguards exist for disability rights in [Country], and what are notable enforcement cases?
2	MLSP	Letter / NGO	In 2025, what is the eligibility age for old-age pensions? Are there gender differences?
		Email /	(1) Procurement plan and tenders, (2) Criteria and required documents for placing homeless citizens into state care centers
		Phone /	How does [Country] address social insurance coverage for citizens living abroad?
3	Justice	Letter /	Council resolution, work report, and main report on the implementation of transparency of public information
		Email /	Information on public safety initiatives and cybercrime
		Phone /	Where can I find detailed information on amended laws?
4	CRC	Letter / NGO	Number and resolution of complaints submitted to the CRC (Communications Regulatory Commission) between Jan 1, 2024 and Feb 1, 2025, under 6.1.2 and 8.1
		Email /	Information on internet accessibility and quality in remote areas and details of ISPs operating in Mongolia
		Phone/	Information on the quality of internet service in your organization
5	Election	Letter / NGO	Under Clause 8.1 of the Law on Public Information Transparency, list of media organizations that collaborated in the 2024 parliamentary elections and budget execution for campaigns, posters, and video content
		Email /	Information on efforts to increase voter turnout and how the 2024 election participation rate was obtained
		Phone/	Where can I get information on election laws? Has your organization published easy-to-understand materials about the election law?
6	MNB	Letter / NGO	Total funds collected from MNB television license fees, total staff, and HR structure under Clauses 6.1.2 and 8.1
		Email /	Public feedback and measures taken by the organization; local TV development and improvement of public access
		Phone/	Where can I get information about TV programming content?

7	Aviation	Letter / NGO	Budget execution and information on students studying abroad funded by the Civil Aviation Authority
		Email /	Details on airport renovation/maintenance work and number of domestic/international flights
		Phone /	Where can I find the official list of prohibited items for air transport?
8	Prosecutor	Letter / NGO	Detailed statistics of complaints filed by citizens/legal entities to the prosecutor's office up to 2024, including case status (registered, under investigation, or dismissed)
		Email /	Whether the legal oversight process is transparent and information about projects implemented in 2024
		Phone /	Location of the prosecutor's "One-Stop Service" center
9	MPP	Letter / NGO	Total campaign expenditure and list of contracted media agencies used by your party in the parliamentary election
		Email /	Implementation of party policies, programs, and measures aimed at improving citizen welfare
		Phone /	Information about the visit to the Czech Republic: Why did Secretary General Ya. Sodbaatar meet with Marek Benda, Deputy Chair of the Czech Civic Democratic Party and head of the majority group in the House of Representatives?
10	Bulgan (soum)	Letter / NGO	Budget information on projects funded by the Local Development Fund, citizen feedback collected for 2025 programs, and protocol of Citizens' Representative meetings
		Email /	Organization's development policy and public event plans
		Phone / ---------	Due to the Altargana Festival, was unable to contact Rashaant soum- did not pick up
11	Tuv (soum)	Letter / NGO	Documentation regarding LDF-funded projects, budget information and 2025 prioritized citizen suggestions as outlined in project protocols.
		Email /	Organization's HR info and details on the use of local development fund resources
		Phone / --------	Neither the website nor social media pages provide a contact phone number, making telephone inquiries impossible.
12	Supreme	Letter /	Budget report of the Supreme Court on e-court developments between 2023–2025
		Email /	Information on new initiatives to speed up decision-making and court ruling processes
		Phone /	Where can I get information on procedures for special review cases?
13	NOSK	Letter /	How many citizens were allocated housing in 2024–2025? What are the criteria and procedures for applying?
		Email /	How does the organization support youth, elderly, and disabled citizens with housing?

		Phone /	Is there currently a program that provides housing to vulnerable groups without requiring a down payment?
14	JGC	Letter /	Where can I view HR and court decision information of your organization?
		Email /	How are civil, criminal, and administrative court proceedings conducted? Are the processes different?
		Phone /	Where can I view HR and court decision information of your organization?
15	MTX	Letter /	Total 2024 TV license revenue, its allocation to TV channels, and related operational reports
		Email /	HR information and how member TV stations are selected
		Phone /	Can people file complaints about TV content?
16	MTA	Letter / NGO	Total taxes collected from NGOs and breakdown by province for 21 aimags
		Email /	Digital tax reform, citizen service accessibility, and tax support for small businesses
		Phone /	Are individuals eligible for income tax exemptions or reductions?
17	TTT LLC	Letter / private person	Capacity and production planning of improved fuel factories and whether they are meeting targets
		Email /	Organization's policies on the safety and quality of compressed briquette
		Phone /	The coal briquette's composition, quality information
18	Orkhon aimag	Letter / NGO	Budget and expenditure on public information and promotion during 2021–2024 in accordance with Clauses 6.1.2 and 8.1 of the Law on Public Information Transparency
		Email /	The organization's HR policy and public engagement activities
		Phone /	Organization's statistical information
19	Khovd aimag	Letter / NGO	List of projects implemented with public budget investment, and their financial details
		Email /	The organization's HR regulations and job-related information
		Phone /	HR information of the Governor's Office of Khovd Province
20	BU aimag	Letter / NGO	List of projects implemented with public budget investment, and their financial details
		Email /	The organization's human resource regulations and job-related information
		Phone /	Human resource information of the Governor's Office of BU Province