

Swiss Confederation

Federal Department of Economic Affairs, Education and Research EAER

State Secretariat for Economic Affairs SECO Economic Cooperation and Development

Management Response

To the Independent Evaluation of the Economic Cooperation and Development Division's Activities in the Area of Public Financial Management

conducted by Oxford Policy Management (OPM)

March 2021

1) Introduction

An essential part of the Economic Cooperation and Development Division's (WE) evaluation policy is to ensure an impartial assessment of its interventions. External evaluations are therefore regularly conducted on WE's priority themes for accountability and learning purposes.

The External Evaluation of the Macroeconomic Support Division's (WEMU) Public Financial Management (PFM) Portfolio was the last of four evaluations conducted as part of the accountability process for the implementation of the Dispatch on International Cooperation 2017-2020. In addition, and in line with WE's evaluation policy, the evaluation aimed to offer learnings in view of the further development and implementation of WEMU's PFM portfolio.

The evaluation was thus mandated to analyze WEMUs activities in support of PFM in partner countries under the dispatches' outcome objective "stronger institutions and sound policies". The evaluation provides an assessment of WEMU's support of PFM against the evaluation criteria of the OECD Development Assistance Committee (DAC) and identifies the good practices and success factors for the portfolio to perform well against the criteria.

The evaluators were mandated to answer two questions in particular:

- Has SECO's official development assistance contributed to successful reforms in public financial management, and
- What role did the evidence-based approach play in these processes?

WE is pleased with the evaluation's overall assessment that the portfolio has performed very strongly against its objectives and is contributing to the intended objectives for PFM reforms. Regarding the use of diagnostic assessments (also refered to as "evidence-based approach to technical assistance") the evaluation found that the use of diagnostic tools has led to more targeted and better designed reforms while projects benefited at the same time from sufficient flexibility to accommodate for specific country needs and capacities. WE welcomes the finding that confirms its approach to combine diagnostic assessments with elements of flexibility and will continue to develop approaches to project design, which permit flexibility in the project implementation, according to the recommendations (see recommendation 3, below).

WE notes that the performance of the portfolio against the DAC criteria is assessed overall as 'satisfactory' (2.1), with assessments of 'highly satisfactory' (1.3) for relevance, 'satisfactory' (1.9) for coherence, 'satisfactory' (2.3) for effectiveness, 'satisfactory' (2.4) for impact and 'satisfactory' (2.3) for efficiency and sustainability. With many projects still at early stages of implementation, the evaluators had to make projections for their assessment of effectiveness, impact, efficiency and sustainability.

2) Main Findings

Relevance

The evaluation notes that the projects show a very high level of relevance in relation to stated policies and priorities of the beneficiary governments. WE is pleased that the consideration during the design phase of i) the political and economic context, ii) preceding projects financed by SECO and other relevant development partners, and iii) potential future initiatives, has been found to effectively contribute to the relevance of projects. Importantly, the use of diagnostic tools is assessed to having led to better targeted and designed reforms than would have otherwise been the case. This is an important finding, as WE has consistently promoted the use of evidence-based technical assistance through support to global initiatives such as the "Public Expenditure and Fiduciary Accountability" (PEFA) Framework and the Supreme Audit Institutions Performance Measurement Framework (SAI PMF) as well as in its bilateral programs. The evaluators further note that projects have generally been found to be well aligned with official policies but are also flexible enough to accommodate new strategy elements and adapt when required. This was particularly useful during the COVID-19 pandemic, where the sequencing of activities could be adapted, as needed. Going forward, WE will continue to emphasize flexibility in project implementation to ensure that the reliance on an evidence-based approach is well suited to specific needs and capacities (see recommendation 3, below) rather than following a "one size fits all" approach to promoting best practices.

Coherence

WE is pleased that its approach to project design is found to having successfully contributed to coherence, especially with regard to other SECO- and SDC-financed initiatives. With respect to collaboration with SDC, WE takes a more positive view than the evaluators, and believes that the respective portfolios generally complement each other well. In general, the section enjoys very good working relations with SDC. Regular consultations at the portfolio level are complemented with exchanges at the institutional level to ensure that synergies are further strengthened (see recommendation 4, below). WE regularly invites SDC, SIF and staff from other Federal agencies to knowledge events to further coherence and mutually benefit from expertise. Given the significant resources the section has dedicated to donor coordination, WE is pleased with the finding that its efforts to maintain and strengthen cooperation with other development partners are found to be commendable. WE notes that the evaluation identifies the extensive preparatory donor coordination for multi-donor trust funds (MDTF) projects and the establishment of PFM working in-country groups as especially beneficial for the coherence of projects. According to the evaluation, WE has been markedly pro-active among the development partners to promote the formation and conduct of regular meetings of PFM sector working groups.

Effectiveness

The evaluation found that overall, the portfolio is contributing to the intended objectives in support of institutional strengthening in PFM. WE notes that the positive assessment of overall effectiveness was significantly lowered by the scores of three specific projects and believes that better accounting for these outliers (using median rather than mean values) would have provided a more adequate picture. This being said, the evaluation found the origin of the challenges faced by these projects to be outside WEMU's control (i.e. failure of the co-financing partner to identify an appropriate implementation partner, lacking donor commitment in multi-donor settings) and notes that its reaction to mitigate the challenges was appropriate and effective. WE is pleased with the finding that the portfolio is contributing to the 2030 Agenda and several of the Sustainable Development Goals (SDGs) by strengthening the efficient management of public finances and the framework for expenditure management in subnational governments. WE agrees with recommendation 9 and is committed to strengthen the narrative linking the objectives relating to SDGs to its PFM project objectives as envisaged under the new Dispatch 2021-24. Importantly, the increasing focus of WEMU's projects on subnational capacity building is found to be particularly effective in view of contributing to the SDGs (recommendation 4, below).

Impact

The evaluation finds the focus on supreme audit institutions (SAIs), PFM reform and/or PEFAs to be impactful, which is an important finding. Furthermore, the portfolio is assessed to having made an important contribution to increased efficiency and transparent and accountable processes and institutions. WEMUs support to the PEFA Framework with contributions to the PEFA Initiative as well as through pervasive use of PEFA assessments is seen to having contributed to an open debate and understanding of the status of PFM systems. WE is reassured that the evaluation condones the approach of focusing on 'intermediate objectives' at the PFM reform level instead of high-level objectives such as "no poverty", "zero hunger" or "improved service delivery". PFM reforms are found to be a means to achieve higher level objectives but their success in doing so depends on external conditions. In this context, the evaluation finds it important to be realistic regarding the potential change that can be expected, alongside the clear identification of functional gaps. The evaluation found examples of projects having produced results at the impact level (by improving the allocation of public funds) but cautions that support to PFM reforms should not be expected to have an immediate measurable impact at the level of fiscal management.

Efficiency

The majority of projects scored satisfactory for efficiency by progressing towards delivery of outputs within the originally defined budgets and with pervasive use of national and international competitive bidding. World Bank-implemented MDTFs, where the financial management of the project was recipient-executed, scored not as well though. Extensive World Bank procurement requirements overwhelmed beneficiaries and led to significant delays. WE welcomes this finding, which confirms its own assessment. When comparing the performance of different implementation modalities against the DAC criteria, the evaluation found that multi-bi projects do not perform at the same level as global and bi-lateral projects on effectiveness, impact, efficiency and sustainability. It would have been useful to obtain further insights regarding the comparative advantages between the two later categories but the evaluation did not find significant differences. Also, somewhat surprisingly, the evaluation did not find significant differences regarding efficiency or any other DAC criteria when considering the level of project activities (national, subnational or combined) or the type of

implementation agency. However, the evaluation finds that when partnering with IFIs it can be more challenging for WEMU to initiate corrective measures. WEMU will include this finding in its analysis on the trade-offs between the bilateral and multilateral/IFI project implementation (recommendation 2, below). Furthermore, when planning multi-bi projects, WEMU will discuss the beneficiary's capacities to execute projects with partner IFIs in order to avoid selecting inappropriate delivery modalities. WEMU will continue to participate actively in steering the projects and monitoring project development with the objective to improve effectiveness, impact, efficiency and sustainability.

Sustainability

3) Specific Recommendations

The evaluation recommends to strengthen the use of local capacity building and peer-learning initiatives to sustain the results against the backdrop of frequent staff turnover. WE agrees that enhancing sustainability requires continuous efforts and learning. However, it also believes that SECO has been one of the most active donors in promoting peer-learning (notably through the pioneer project PEMPAL; Public-Expenditure Management Peer-assisted Learning Network) and continues to promote such approaches to strengthen ownership and sustainability. Significant efforts were made to support local training facilities and partner with universities to strengthen the pool of local expertise. However, not all projects lend themselves to integrating such activities.

The evaluation further provides a useful overview of different approaches to capacity development implemented in the project sample as well as some guidance on the sequencing of capacity building activities (recommendation 7, below). WE notes that projects that include both the national and sub-national level also provide a forum for coordination and cooperation by bringing together officials from both levels. WEMU will continue to consider linking both levels in its projects (recommendation 4, below).

Please, refer to the table in the Annex. Martin Saladin Raymund Furrer Head of Operations Head of Economic Cooperation and Development

<u>Annex 1</u>: Specific Recommendations and Management Response

Recommendations	Management Response	Responsibility	Deadline / Timing
1. SECO should continue to maximize policy engagement - especially when engaging jointly with other donors in MDTF: Rationale: SECO has positioned itself as one of the leading development partners in PFM support in its priority countries and in two global PFM initiatives. For implementation through MDTF by IFIs, the evaluation recognizes that SECO already places importance on active participation in the formation of such Development Partner consortia. However, the level of engagement has, in some cases, not been satisfactory due to the IFIs' own constraints and ways of working. In some cases, the evaluation found that SECO could have played a stronger role as a partner in PFM reform policy dialogue and during project implementation. This recommendation could be implemented by: Playing a more active role in the project formulation and preparation phase; be an active partner in the project steering and ensure to be part of implementation missions from an early stage, lead coordination with relevant partners; Using SECO's existing knowledge for synergies and coordination with other DPs from existing engagements; Continuing support to global initiatives and harvest synergies to bilateral projects Being ready to take corrective action at an early stage; Developing strategic cooperation with other Swiss institutions e.g. Swiss Federal Audit Office and Swiss Federal Tax authority.	WE agrees that policy engagement is crucial. It actively engages in multilateral and global initiatives, a fact that is being recognized by the evaluation. However, a trend towards larger MDTFs, combined with an increasingly limited role for donors is constraining SECO's ability to actively participate in project formulation and preparation. A guidance note for WE Programme Managers was developed in consequence to provide guidance on SECO's expectations and minimum requirements. WEMU continues to discuss these issues with the IFIs and is monitoring the trend, while identifying policy options. WE also agrees with the suggestions pertaining to the use of synergies with and cooperation with other partners, harnessing synergies from global engagements at the bilateral level and the need to take corrective action at an early stage. Further strengthening coordination and collaboration with other Swiss Federal Institutions is a priority for WE; WE benefits greatly from close cooperation with several other departments. With SIF and SDC working-level exchanges are frequent through consultations, common knowledge events and brown bag lunches. However, current financial rules are limiting SECO's ability to leverage the expertise of other federal institutions through formal mandates.	WEMU	Continuous

2. SECO should continue to maintain a balance
between the bilateral and MDTF/IFI project
implementation modalities:

Rationale: The bilateral and MDTF/IFI project modalities have different strengths and weaknesses. The evaluation supports the present practice of aiming for a mix of bilateral and MDTF/IFI implementation modalities to balance the benefits and risks of the two modalities.

This recommendation could be implemented by:

- Undertaking a review of a small number of bilateral projects to estimate more accurately the total real costs of project design and management, both financially and in terms of SECO staff-time required at headquarters and in-country, and making a comparison with the costs associated with projects implemented under the MDTF/IFI modality;
- Identifying in advance specific thematic areas where there may be special value in adopting the bilateral modality. This could arise, for example, where SECO wishes to develop an experimental new approach to a PFM problem area, or alternatively where a project deemed to be very promising is unlikely to receive support through a collaborative MDTF/IFI modality.

WE agrees with the recommendation. More information regarding the costs and trade-offs between different implementation modalities would be useful to set prioritities and inform internal discussions on administrative processes. WEMU will therefore attempt to assess the cost in terms of SECO staff involvement. WE also generally agrees that some projects are better served by a bilateral modality but is not convinced that it will be feasible to specify the topics in advance. It is also unlikely that one modality should always be preferred over the other in the context of new or experimental approaches that WEMU would wish to explore. With the flexibility of bilateral projects and the knowhow that can be available through MDTF, both modalities can offer benefits in that respect.

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3. SECO should continue to develop approaches to project design, which permit flexibility in the project implementation:

Rationale: The evaluation found that many of SECO's PFM projects use adaptive approaches during implementation. This is consistent with good practice, which emphasizes the importance of flexibility and adapting reforms to changes in context. Rather than specify a particular approach, SECO should continue to determine the degree of flexibility required, and then determine the appropriate mechanism for achieving that flexibility.

This recommendation could be implemented by:

- For larger projects and projects with a long duration, provide for a breakpoint at which the project design can be reassessed;
- Allocating a portion of the total budget to a fund, the utilisation of which will be determined during the course of the project and may well involve a substantial role for the beneficiary (MoF or other). This provision also will increase beneficiary buy-in to the project;
- Continuing and expending the modality with presentation of sub-projects by the government partner (MoF) with approval of a committee with representation of SECO (or delegation);
- SECO staff to keep abreast of the development of more flexible development approaches by other development partners and research institutions;
- Assessing the application of the recent experiences with online tools during the pandemic in projects and provide more systematic guidance to projects on how the tools can be best used including assess if activities can be performed online without loss of effectiveness.

WE generally agrees with the recommendation, as well as the specific suggestions which it sees relevant for WE's engagement beyond PFM. It however notes that all of the specific recommendations are already part of its current practice, and have proven their usefulness. WEMU will continue to promote country-specific and iterative solutions that take as a starting point institutional capacities and needs. A series of team-learning events on the "Problem-driven Iterative Adaption" (PDIA) approach is already being planned. WEMU will further strengthen the use of milestones and break-points as a means to assess progress and manage risks. With respect to remote assistance, WEMU is in the process of collecting feedback to draw lessons from the use of online tools. It sees potential to increase the use of online tools and solutions but does not see them as a substitute for physical project delivery, in particular in new or challenging settings. One notable example is the e-PEFA that is expected to bring efficiency gains, without a loss of effectiveness.

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4. SECO should continue to support the strengthening of National/Subnational PFM linkages:

Rationale: SECO has played a pro-active role in promoting the progression in project activity in the PFM thematic area to include support at the subnational level. This is an important development as most spending directly affecting service delivery and advancement of the SDG agenda often takes place at the subnational level. An important observation of the evaluation is that the effectiveness of support at subnational level is strongly influenced by the relations between the central and the subnational layers of government. SECO can play an important role in strengthening these relations through simultaneous engagement at both levels and the programming of joint activities in project design.

This recommendation could be implemented by:

- Including in projects supporting sub-national entities provisions for project activity at the central level;
- Continuing to advocate and, where appropriate, support the undertaking of subnational PEFA assessments to provide baseline thematic guidance in project design;
- Engaging with the central agencies as a core component of projects which are primarily supporting subnational governments;
- Close cooperation and coordination with other agencies working in the PFM thematic area at subnational level in the country concerned;
- Including output(s) in national PFM projects that relate to results in subnational projects, if projects are executed at both levels.

WE generally agrees with the recommendation as well as the specific suggestions. All of them are fully aligned with WEMU's current approach to subnational PFM capacity development as defined in the respective guidance note. As highlighted in this document, The section will continue to promote a holistic approach that combines national and subnational level interventions in its PFM projects, and will encourage the application of global and multicountry initiatives at the subnational level. However, the extent to which these linkages need to be integrated in a single given project or whether synergies are being sought at the portfolio level should be determined by a case-by-case approach.

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5. SECO should more clearly reference the			
coherence and synergies of its projects with			
those of SDC, where both are present at country			
level:			

Rationale: The evaluation notes that particular attention is given to WEMU, WEIN and SDC activities during project design. However, in some projects, implementation relationships with other Swiss development interventions are not clearly referenced, although it is expected that coherence and synergies will be achieved.

This recommendation can be implemented by:

- SECO programme designers ensuring at the time of Credit Proposal preparation that due attention is given where relevant to implementation relationships with SDC initiatives identified in a given project, particularly where the implementing arrangement is through an IFI where the specifically Swiss aspect of the project is of less central concern;
- Closer coordination between SECO and SDC to ensure complementarity and mutual support for all Swiss projects addressing the project's thematic area;
- Conducting early conversation with implementers of other relevant ongoing projects with tentative agreements on cooperation;
- Strengthening coordination with other development partners (DP) by taking or resuming leadership in DP coordination groups/round tables.

WE only partially agrees with the recommendation. With regards to the projects under review it believes that interventions are generally well-coordinated and complementary, while recognizing that in one case (Albania) the process was not as smooth. Additionally, the scope of the recommendation is somewhat limited, since joint presence is a given only in the Eastern countries as well as Northern Africa.

This being said, WE is in an ongoing dialogue - both, at

the institutional as well as at the portfolio level to further define complementarities and strengthen synergies. Notably, under the new dispatch, the scope for complementary measures as been broadened to ensure more widespread use of synergies between SECO's and SDC's instruments. WE agrees that donor coordination is very important to ensure coherence and alignment with local priorities, and the section has traditionally been very actively involved in such fora, a fact that is being recognized by the evaluation. It will also continue to assume leadership roles as appropriate but sees limited scope to step up this engagement much further.

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6. SECO should develop a more coherent
approach to Theory of Change and Change
Management across its PFM portfolio:

Rationale: While the formal adoption of a strategy for change management remains the exception rather than the rule in the SECO projects reviewed, most if not all projects contain elements of such a strategy. The evaluation believes that SECO should continue to develop this element of its project management methodology.

This recommendation could be implemented by:

- Formulating an approach to Theory of Change and Change Managementbased on experience to date in projects that have introduced these approaches, reviewing the comparative experience of other donor agencies, and development of Theory of Change and Change Management approaches and methodologies to be applied to all new SECO projects;
- Preparing a SECO conceptual paper and guidance instructions for use by all SECO staff and internal training in the application of the adopted approaches.

WE generally agrees with this recommendation. Over the
years, WEMU has sharpened its understanding of
change management and has included elements in its
projects. Similarly, WEMU has started using Theory of
Change Approaches in its bilateral projects. However,
the extent to which these elements can and need to be
integrated depends both, on the nature of the project, as
well as the implementing partner. WE therefore agrees
that systematizing its approach to when such approaches
are expected to be applied would provide useful
guidance for program managers.

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7. SECO should further strengthen its approach
to sustainable capacity development, building on
the experience of projects within the evaluated
portfolio where the approach has been
successful:

Rationale: The SECO projects include different approaches to individual and institutional capacity development but ot all are succeeding to the same degree in the typical context with shifting government officials at all levels. In some cases the capacity development activities are relevant but often need to be repeated several times at the individual level by the project.

This recommendation could be implemented by:

- Anchoring systematic long-term CD initiatives to national institutions (e.g. as in the Peru SNG project) and including the MoF as supervisor for subnational PFM training wherever possible;
- Ensuring that P2P is implemented in modalities with capable partners and with proper monitoring of the implementer and enough budget to follow up;
- Applying CD approaches that also includes the management level, so all staff are familiar or informed about new approaches (e.g. as in the Albania SNG project).

WE generally agrees with this recommendation. For vears. WEMU has been strengthening its approach to sustainable capacity building, and this will continue to its key focus. Nevertheless, there is no magic bullet to addressing the issue of sustainability in capacity development. Creating local training institutions can be an important element of strengthening sustainable capacity development but it may not always be feasible or suitable. However, peer-learning has been a longstanding feature of WEMU interventions, and WEMU continues to see this as a key element to strengthen the sustainability of its engagement. WE also agrees on the importance of including senior level officials in capacity building, which is part of its policy dialogue. WEMU wi continue its efforts to learn from succesful approaches its portfolio (and beyond) and invest in sharing lessons learnt.

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8. SECO should strengthen the approach to inclusion of transversal themes – climate change, gender, anti-corruption, digitalization – in project design, where local opportunities and partner strategies permit:

Rationale: Transversal themes (gender mainstreaming, climate change, digitalization, anti-corruption) are included at a general level in credit proposals, but not with details on implementation in projects. The opportunities for addressing transversal themes are typically highly project-specific so it is not appropriate for SECO to make across-the—board prescriptions on the inclusion of these themes in all projects. The approach should rather be to ensure that all SECO programming staff are well-versed in the existing approaches to inclusion of transversal themes in PFM projects and are familiar with the work of other departments.

This recommendation could be implemented by:

- Credit proposals should more explicitly identify whether transversal themes are being pursued and the relevant coordination and synergies with other DPs and government partners;
- Implementing a cooperation with other development partners (e.g. UN Women, IDI and NORAD (Norway) on how to build gender mainstreaming into PFM projects;
- Following government partners' lead where appropriate, by supporting inclusion of transversal themes in national strategies (e.g. the Ghana Domestic Revenue Mobilization project played an important role in supporting the inclusion of a Gender Strategy as part of the overall development strategy of Ghana Revenue Authority).

WE agrees with the recommendation, and has already significantly increased its efforts aimed at including transversal themes in the design and implementation of projects. Recent/Ongoing efforts include:

- A paper on mainstreaming of climate change measures has been drafted; and WEMU invests in continuous team learning to broaden its understanding of the topic:
- With SECO's support, a supplementary module on climate was developed under the PEFA Framework. It will serve as a starting point for integrating climate-related aspects in SECOfinanced projects. A team learning event is being organized to familiarize the team with the tool;
- Guidance on the application of the PEFA gender module is being established, and lessons will be drawn from its pilots in SECO priority countries;
- The completion of a Gender Checklist is now mandatory for all projects to be approved, and is generally discussed with the thematic lead (focal point gender).
- FinTech guidelines are being drafted, and a corresponding workshop has been held;
- An Anti-Corruption concept paper has been drafted and a workshop been held.

WE therefore believes that these more recent efforts may not have been reflected in the portfolio given the evaluation period (focus on 2017-20 Dispatch period) but expects results to materialize in recently approved projects.

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9. SECO should make more visible the link between objectives relating to SDGs and PFM project objectives, in order to better communicate the link between its PFM portfolio and the Swiss Dispatch on International Cooperation:	WE agrees with the recommendations. In fact, under the new Dispatch and Storyline 2021-24 the results framework links the different indicators to the SDGs. Accordingly, Credit Proposals now include a reference to the SDGs and discuss the contribution of the project to the specific SDG.	WEMU	Continuous
Rationale: The Dispatch 2017-2020 states that the 2030 Agenda is the reference for Swiss International Cooperation. All the projects reviewed are clearly following the 2030 Agenda and can be linked up to certain SDGs or SDG targets, but only in a few cases is this clearly visible in the CPs and other project documents. The SDGs and the 2030 Agenda are more clearly referenced in the projects of other development partners.			
The recommendation could be implemented by:			
 SECO should develop guidelines or a conceptual paper on the 2030 Agenda and on how PFM projects are linked to this generally and to specific relevant SDG targets and their indicators; The linkage between project and SDGs should be elaborated in all CPs and incorporated as far as possible into project's objectives and indicators. 			