

## Monitoring of Management Action Plan Guidelines

### Policy base for Guidelines

As per the 2019 Project Accountability Policy (PAP), IPAM will monitor the implementation of any Management Action Plan produced to implement the recommendations to address findings of non-compliance once approved by the Board in accordance with Section III, Paragraphs 2.7 and 2.8 of the PAP.

### Objective

To monitor the implementation of approved MAPs in the context of the finding/s of non-compliance identified in the Compliance Review (CR) Report.

### Criteria

MAP Monitoring will take place until MAPs are implemented. Two criteria must be met to consider MAPs implemented: (i) implementation plans and commitments detailed in the MAP are being effectively carried out; and (ii) implementation timetables are being met.

### Monitoring Approach

As part of its monitoring activities, IPAM may:

- consult with the Requesters, the Client, Bank management and other relevant stakeholders;
- consider Project documentation, documentation submitted by the Requesters (or their Representatives, if any), and publicly available information;
- consider the contents of monitoring updates received from Bank management.
- undertake a site visit to the Project area, if deemed necessary by IPAM; or
- engage consultants on specific technical matters.

### Monitoring Plan

IPAM will produce a draft monitoring plan based on the draft management action plan. This draft monitoring plan shall include the expected duration of the monitoring stage, the proposed activities and for each proposed management action, the IPAM requirement to determine its completion.

The proposed draft will be shared with Management for discussion prior to submitting the CR package for consideration of the Board. Once the MAP is approved, IPAM will issue a final version of its Monitoring Plan.

Action No.	EBRD Management Action Plan Commitment and Deadline	IPAM Proposed Monitoring Activity	IPAM timeline	IPAM Requirement for determining completion

**Reporting**

Monitoring reports will be produced as per the Case Monitoring Plan and will describe ongoing monitoring activities in respect of each open case and provide updates on the implementation of each MAP. The reports will be issued at least bi-annually and will be submitted to the Board and the President for information, made available to Requesters, Bank management and the Client and published in the Case Registry.

Additionally, IPAM may provide specific information on MAP implementation and outstanding issues of non-compliance to the Board as part of its quarterly reporting or on an as-needed basis

**Management Rights and Obligations**

- Bank management will be required to update IPAM on the implementation status of each approved MAP at least bi-annually.
- It will have 10 business days from the date of IPAM’s request to submit monitoring updates.

**MAP Monitoring Handout Content**

<b>Monitoring of MAP</b>		
IPAM will monitor the implementation of approved Management Action Plans, in the context of the findings of non-compliance identified in the Compliance Review Report until it considers all actions have been completed.		
<p><b>Duration</b> As long as pending actions remain</p>	<p><b>Criteria</b> i. Plans and commitments are effectively carried out ii. Timetables are met</p>	<p><b>What does IPAM do</b></p> <ul style="list-style-type: none"> <li>• Consult with requestors, Client and Bank management</li> <li>• Consider project documentation, monitoring updates</li> <li>• Undertake site visits</li> <li>• Engage consultants</li> </ul>
		<p><b>Output</b> A <b>Monitoring Report</b>, at least bi-annually, providing updates on the implementation of the MAP, until IPAM determines that full implementation has been achieved.</p>

## MAP Monitoring Report Template

TITLE PAGE - Mention Project name and number, # of the monitoring report, monitoring period covering the month and year.

1. TABLE OF CONTENTS
2. EXECUTIVE SUMMARY
3. GLOSSARY/ACRONYMS/ABBREVIATIONS
4. INTRODUCTION

This section provides a short description of the relevant case, the case processing timeline with a focus on relevant compliance reviews dates and outcomes. Links to relevant case documents for each stage are included with due consideration to AIP.

### 5. BACKGROUND AND CONTEXT

- Provide a brief description of the project including date of approval and status to date of report
- Brief narrative on CR non-compliance findings
- List CR recommendations vis-à-vis Monitoring Action Plan proposed activities and deadlines

### 6. MONITORING UPDATE

- **Monitoring Activities:** Outline the IPAM activities undertaken during the relevant monitoring period, providing details on engagement with relevant stakeholders, document reviews undertaken, project site visits and /or hiring of experts
- **Monitoring Findings:** Brief narrative on general MAP implementation and actions completed to date, plus any challenges faced regarding completion as per established deadlines.
- MAP Implementation and Monitoring Summary table

Action No.	EBRD Management Action Plan Commitment	EBRD Management Implementation Update	Status of Management Action Plan Commitment	IPAM Comments and Next Steps

### 7. CONCLUSIONS AND NEXT STEPS