

# DIGITAL TRANSPARENCY INDEX 2024

## for Government Organizations



Monitoring report

The "Government Organization's Website Transparency Index 2024: Monitoring Report" was initiated by the IRIM Research Institute for the 13th year.

Please indicate the source from which the results of the monitoring report will be used.

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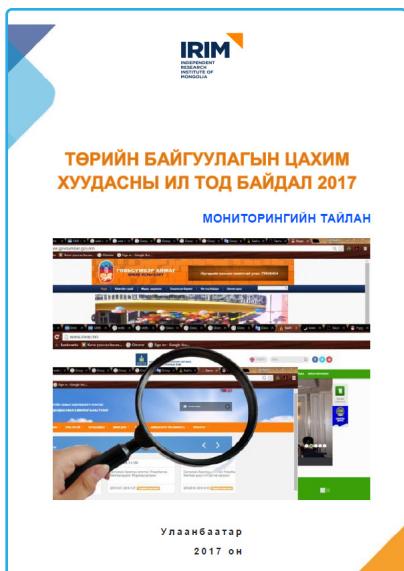
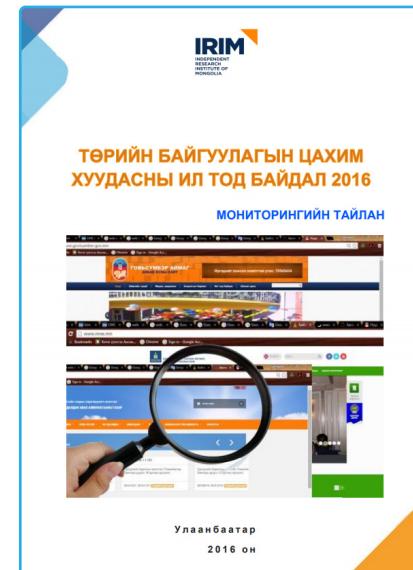
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## PREVIOUS REPORTS OF GOVERNMENT ORGANIZATION'S WEBSITE TRANSPARENCY MONITORING



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# Introduction

Information and communication technology (ICT) creates opportunities for open, transparent and fast delivery of information, regardless of distance and geographical location. However, there are challenges around the world in

adapting, integrating and evolving to these technological advances, and this is especially encountered by government organizations. Effective use of ICT opportunities is necessary to ensure transparency of public services and improve access to information. At the same time, requests and demands from citizens to improve the transparency of government information are increasing. Efforts to measure and make result based improvements are being made in order to assess these requirements and demands.

One of the major assessments is the E-Government Development Index (EGDI) by the United Nations Development Program (UNDP) , which has been evaluating countries regularly since 2002. This index is an important indicator to evaluate the general state of e-government development.

In the 2024 "E-Government Development Index" report, the following countries were leading: :

1. Denmark – 0.9847 points
2. Estonia – 0.9758 points
3. Singapore – 0.9691 points
4. South Korea – 0.9679 points
5. Ireland – 0.9643 points
- 6.

These countries lead the world in the development of e-governance and show that government services are delivered to citizens in an accessible and efficient manner. In this assessment, Mongolia scored 0.8457 points and ranked 46th out of 193 countries, which is an increase of 28 places from 74th place in 2022. It also ranked 37th out of 193 countries with a score of 0.7808

on the e-Participation Index, which is an increase of 20 places from 57th place in 2022. These progresses show that since Mongolia established the Ministry of Digital Development and Communication in 2022, it has had an important impact in the significant progress in the development of e-governance.

The basis for the development of e-governance in Mongolia is the national program "Digital Nation" approved in 2004. This program had an objective to develop efficient and cost-effective government services addressed to citizens where every organization has a website, every citizen has an e-mail address, and government services can be delivered online. This digitization process of rapidly developing information technology is approaching a new stage of how to use artificial intelligence (AI) after 20 years. The rapid development of AI has taken place and has become one of the most important topics in the world in 2024. AI has already been widely used in the fields of education and health, and countries have already begun to define and approve upon policies and strategies on AI. As for our country, the Ministry of Digital Development, Innovation, and Communications and the United Nations Development Program have jointly developed and started implementing Mongolia's National Strategy for Artificial Intelligence. In this context, on February 13, 2025, the "National Strategy for Big Data and Artificial Intelligence" was presented and submitted for public discussion. . The main goal of the strategy is to primarily introduce and integrate AI in the mining and energy sectors. It is believed that Mongolia's extreme climate and renewable energy resources will create a favorable environment for the establishment of energy-efficient data centers, and the use of AI in these areas will contribute significantly to economic growth.

Today, AI is widely used in the field of data, data processing, information searching and obtaining. Therefore, the accuracy and reliability of information received from AI is now considered important. Government organization's dissemination of information through its website and other official channels is one source for citizens to ensure accurate and reliable information. Therefore, it is necessary to pay further attention to integrating their data and information into information chains and flows with the help of artificial intelligence.

According to the "Government AI Readiness Index" released by Oxford Insight, Mongolia has advanced 11 places in 2024 and is ranked 98 out of 188 countries. This indicates progress in AI development, infrastructure and data openness. At the same time, the process of data openness of government organizations is intensifying, and integrating information allows citizens, the public, and the media to monitor information from one place.

Mongolia's "Vision 2050" long-term development policy document provides for the gradual implementation of the goals of digitalization of public services based on information technology, introduction of innovative information and communication services in rural areas, connection to high-speed networks, and expansion of integrated digital databases and infrastructure development. In order to achieve this goal, "Glass Operations" as part of the "5SH" announced by the Government of Mongolia in 2023 plays a crucial role.

The Glass Operations under the leadership of the Minister of Digital Development and Communications must evaluate and publish 68 types of information specified in the Law on Transparency of Public Information, assessed by 98 criterias, and quarterly publish information of all levels of government organizations on the Shilen.gov.mn digital platform. In this context, open information, evidence documents, and scores of all levels of government organizations for 2023 and 2024 are available to the public.

This operation increased the responsibility of digital transparency of government organizations by creating the opportunity for the published information to be monitored by citizens and the public, and contribute to the improvement of citizens' trust in the government to a certain extent. Also, through this platform, it has made it easier for citizens to submit their opinions, complaints, and requests about government organizations, which has become an important step towards making the relationship between the government and citizens more open and effective.

However, in order to ensure the stability of the platform in the future, there is a need for organizations to fulfill their obligations to regularly and continuously update their data, improve server security and data quality, increase data processing capabilities, and improve the capabilities of data input staff.

This report is being prepared for the 13th year in order to assess the scope and capacity of information provided by the government to the public through digital technology.

# 1. Methodology

## 1.1. Goals and objectives of the index

Through the Digital Transparency Index (DTI), IRIM aims to quantify openness and transparency of the digital information of government organizations and inform further improvements.

The DTI enables to:

- measure and rank the level of digital transparency of government organizations,
- do yearly comparisons, and
- provide recommendations for further improvement.

The index allows the comparison of each organization by their strengths and weaknesses. We highly recommend the organizations surveyed use the index as an opportunity to learn from other organizations' experience, recognizing their capacity and challenges to disclose digital information and incorporating the results and findings into their strategies.

The following government organizations are included annually in the calculation of the index results.

As a result of the 2024 parliamentary election, the structure and composition of the government were reorganized, and a total of 98 organizations were included in this evaluation. In comparison, the total number of these six types of organizations was 88 in 2021, 93 in 2022, and 98 in 2023.

**Figure 1**

*Government organizations surveyed in the DTI*



## 1.2. Scope of the Index

Although in recent years, advancements in technology, artificial intelligence, and labor-saving innovations have been increasingly adopted—promoting more streamlined operations in both the public and private sectors—there is growing public criticism that, contrary to this trend, government structures are becoming increasingly bloated, accompanied by a rise in state subsidies.

The right of citizens to seek and receive accurate and truthful information from the government is guaranteed in both international treaties and conventions, as well as in national legal documents. Article 19.2 of the International Covenant on Civil and Political Rights, which Mongolia ratified in 1974, states: "Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice."

Article 16 of the Constitution of Mongolia (1992) adopted specifies the basic human rights and freedom and Clause 17 of the Article specifies that the citizen of Mongolia shall have the right to seek and receive information on any issues, except which the State and its organs are legitimately bound to specifically protect as relevant secret. For a country with a democratic system, the clause declares the legal basis for the state transparency and citizens' right to information. Proactively disseminating information to the

public in an accessible and active manner is one of the most measurable and improvable channels in line with the government's mandate. Using digital tools to share information enables better control over the accuracy and integrity of the source or the informant. While various international organizations offer differing definitions of information transparency and digital openness from their own perspectives, these definitions have been clearly outlined in previous editions of this monitoring report. For more detailed information on the definitions and measurement methodologies related to information transparency, please visit: <https://www.irim.mn/p/17>

The process of making government information transparent is not only about the outcomes of government activities, but also involves evaluating whether an enabling environment for transparency exists, whether the responsible public institutions have the capacity to implement it, and whether, as a result, citizens and the public are receiving complete, accessible, and user-friendly information. Therefore, the model for measuring digital transparency of information attempts to provide a comprehensive assessment of how well the right to access information is ensured by evaluating: i) the existence and adequacy of the legal environment, ii) the institutional capacity of public organizations responsible for providing information, and iii) the extent to which information, facilitated by technology, is delivered to citizens in a complete and timely manner.

**Figure 2**

*Digital Transparency Index*



The enabling environment domain assesses the country's legal and policy environment for information transparency. The policy environment domains and its corresponding indicators are evaluated at three levels: international, national, and institutional, and include some sectoral indicators. The scores of the corresponding indices are used as a conversion according to the indicators defined at the international level. In addition, it examines the enabling environment of the government organizations to ensure the transparency and openness of information. The DTI shows whether the rules and procedures to implement the policy are available and complied in the organization and how policies are implemented. While the previous methodology gives a single consolidated score, the revised methodology is able to see each organization's performance separately as it examines how each organization ensures transparency. The domains of organizational capacity is focused on the government organizations' capacity to ensure the transparency. The previous years' assessment results have shown that a level of transparency depends largely on the capacity and resources of the organization. Enabling environment such as availability of the relevant rules and procedures combined with the management leadership have seen to play a critical role to ensure transparency. However, in most cases, lack of process, rules and procedures has hindered the digital transparency. Thus, it is necessary to take the legal framework of the organization into account of the organization's enabling environment.

**Figure 3**  
*Level of assessment of the policy environment*



Besides readiness of the policy and regulatory documents in an organization, digital transparency is determined by the clarity of internal process of disclosing information and human capacity and their skills and knowledge of handling the technology and how compatible the technology is with information disclosure.

According to the first methodology developed in 2019, the assessment of this domains was based only on the primary data collected from the staff of the organization. The revised methodology is characterized by reducing the subjective influence of the respondents and technological parameters as much as possible as website capacity itself indicates the technological capacity of an organization. The process of digital disclosure and of the human resource was assessed based on both primary and secondary data.

Disclosed information domain focuses more of the output aspect of the information disclosed, or it will assess how accessible the websites are to the citizens and placing importance on open data aspects specified in the Public Information Transparency Law, which are given as follows:

- Article 8.8 says that 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.
- Article 8.12. says that regardless of the use of other means of information, the person responsible for the information must operate the website and bulletin board and fully meet the conditions for viewing Disclosed information on the website.
- Article 8.13 says that in case of disseminating or clarifying Digital disclosure, the source of the information shall be clearly indicated on the website.

Apart from the compliance with the legal phrases regarding readiness of relevant policy documents, we also look at the timeliness of the information disclosed. Besides measuring the extent of information disclosed, we assessed the effectiveness of processes or linkages to ensure access to information and create demand because this aspect of the website will be fundamental to ensure effective communication with the public and disseminate information in a timely manner.

### 1.3. Domain of the index and methodology

Like most indices, the DTI generates a single consolidated score. The index can be presented by national and organizational levels. The DTI is comprised of three domains with 10 sub-domains, 35 indicators and 150 questions. For details, see Appendix 1. Methodology: Indicators and corresponding scores.

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The DTI is comprised of three domains with 10 sub-domains, 35 indicators and 150 questions.

When calculating the DTI, different weight is given to each domain depending on (i) the number of questions in the sub-domains and (ii) degree of importance.

- The DTI is comprised of a total of 150 questions, 57 of which are from policy environment domains, 29 from organizational capacity domains, and 64 from the digital disclosure domain. Thus, these sub-domains are weighted as 38% (57/150), 19.3% (29/150) and 42.7% (64/150).
- As the same weight is given to the importance factor of each three domain, it gives us 33.3% (1/3).

Therefore, the policy environment is calculated at 35.65%. In order words, the number questions determine the weight of the indicator within the DTI.

$$DTI = \frac{1}{l} \sum_{k=l}^k \left( \frac{1}{3} \sum_{n=25} A_n + \frac{1}{3} \sum_{n=5} B_n + \frac{1}{3} \sum_{n=5} C_n \right)$$

$k$ - Primary Adder Index      A- Enabling legal environment  
 $l$ - Number of organizations      B- Organizational capacity  
 $n$ - Number of indicators      C- Digital disclosure

**Table 1**

Indicators and corresponding scores

Code	Indicator	Total score
<b>E. Policy environment</b>		<b>57</b>
E1	Rights to information (international)	8
E2	Governance (international)	12
E3	Civil society (international)	15
E4	National legal and regulatory documents	14
E5	Organizational level regulation	8
<b>O. Organizational capacity</b>		<b>29</b>
O1	Process and resource to ensure organizational transparency	12
O2	Capacity of the technology	11
O3	Capacity of ICT	6
<b>D. Digital disclosure</b>		<b>64</b>
D1	Disclosed information	56
D2	Communication and accountability	8
<b>Total</b>		<b>150</b>

**Figure 4**

Index interpretation

<b>Good</b>	$\geq 0.80$	Procedures, resources, and accountability mechanism are sufficiently put in place.
<b>Satisfactory</b>	$0.65-0.79$	Some of the procedures, resources, and accountability mechanism are in place but need improvement.
<b>Moderate</b>	$0.50-0.64$	Limited number of the digital transparency criteria are met. The existing information needs update and resource should be built.
<b>Unsatisfactory</b>	$0.35-0.49$	Very few procedure, resources are available in the organization to ensure accountability and transparency in the future.
<b>Poor</b>	$<0.35$	Most of the digital transparency criteria are failed to meet. Little of information disclosure process, resource and accountability exists.

The index results range from 0 to 100, with higher values indicating better digital transparency of government organizations, and lower values indicating poorer transparency. The interpretation of the index is summarized in the figure below.

## 1.4 Distinction of the assessment methodology

In recent years, the Government of Mongolia has started to evaluate and implement activities to show the transparency of their information and its scores. The assessment of the openness of information published by the government is similar to the assessment made by IRIM and seems to reduce its importance, but it is worth clarifying the methodology difference and the importance of external independent assessment.

Specifically, the "Glass operation" which is part of the "5SH" operations, as part of the actions declared by the Government of Mongolia to be the "Year of Fighting Corruption" in 2023, evaluating 68 types of information specified in the Law on Transparency of Public Information, assessed by 98 criterias, and quarterly publish to the public. Within the framework of evaluating the performance of Glass Operations, the objective is to check whether the government organization's website contains legally required open information, and it includes the following four indicators:

- Accessibility of information
- Timeliness of publication
- Quality and integrity of information
- Clarity of source

However, the evaluation methodology of the Government's Glass Operations is only focused on checking the information on the website, so it cannot be directly compared with our evaluation methodology (calculated as the average of three indicators: Policy environment, Organizational capacity, and Digital disclosure). The above four indicators are more similar to the Digital Transparency Index's (DTI) Digital disclosure domain, or the Transparency of websites of government organizations, the study we carried out before 2021.

The methodology for evaluating the performance of the Glass Operations is calculated by 30 points for each of the above four indicators, and the total score is 120 points. Therefore, looking at the level of transparency of each organization shows different results compared to our DTI, and overall, transparency is achieved for most organizations. However, precise and clear criteria and evaluation methodology for how each of the four indicators is evaluated are not openly disclosed. As it plays an important role in ensuring transparency to the users and presenting government activities in an open manner, there is a need to present the indicators in a separate section on the platform in a more precise and understandable manner. This will ensure that the public, professionals and users can fully understand and use the assessment.

Also, within the indicators of quality and integrity of information, it is necessary to create a mechanism to monitor the regular workability of the links and to correct them in case of errors. For example, there have been instances in information integrity assessments where links were working properly during the assessment and received full marks, but errors were detected when users later tried the links. This indicates that the links were not thoroughly tested during the evaluation process. Therefore, regular monitoring of the link's normal operation is important to ensure the continuity of the platform and to provide users with accurate and reliable information. It should be defined in detail and the criteria and evaluation methodology should be posted on the website. This will ensure transparency for users and regulatory parties and ensure the stable operation of the system.

In general, the DTI is a more comprehensive assessment than this assessment. Also, the criterias and its calculation methods are different and offer a more realistic scoring system

## 2. Results of the Digital Transparency Index

### 2.1. Combined results

The digital transparency index (DTI) of state and local administrative organizations in 2024 was 69%, increased by 3.8% compared to the results of the previous year being 65.2%, with a level of "satisfactory".

This growth is directly related to the improvement of the digital disclosure domain. Digital disclosure has improved by 5.3% compared to last year, which is the main factor influencing the improvement of digital transparency this year. Although the policy framework and organizational capacity has steadily increased over the past three years, digital disclosure has decreased in performance due to legal reforms. On the contrary, the improved implementation of the Law on Transparency of Public Information in 2024 has been observed on many websites, organizations have fully published their information and have shown a positive impact on the website's operations after two years.

The results indicate progress in digital services, transparency, and openness of government organizations and show that efforts to improve digital governance of government and local administra-

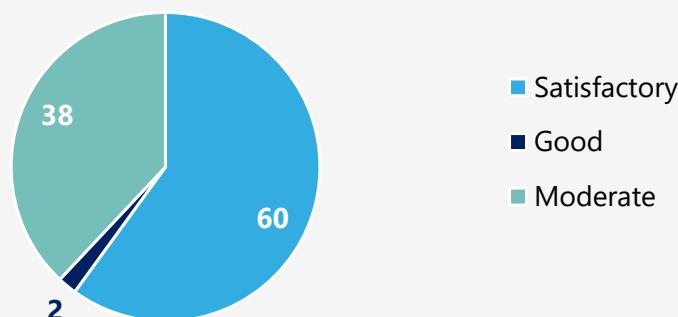
tive organizations are showing certain improvements. However, 38% of the organizations have still been evaluated as 'moderate' level in digital transparency. In 2019 when we expanded our methodology of evaluating the digital transparency of government organizations, 36% of organizations ranked as 'satisfactory' and this result has increased by 24%, as 60% of organizations rank 'satisfactory' in 2024. This indicates clear progress in improving information transparency and access to citizens.

In 2023, 53% of organizations ranked at a 'satisfactory' level, and in 2024, 7 organizations improved their scores from a 'moderate' ranking to 'satisfactory'. According to the average of the last 5 years, 5-8 organizations have improved their scores from "moderate" to 'satisfactory' each year.

However, the remaining 38% was rated at a 'moderate' level, indicating that there are challenges and areas for improvement in digital transparency. These organizations need to pay special attention to organizational capacity, mechanisms for communicating with citizens, and open information.

**Figure 5**

*Level of transparency of the government organizations, %*



## 2.1.1. Changes in digital transparency

IRIM started measuring the digital information transparency of government organizations in 2010, and since 2014, it has been continuously evaluated every year. In 2019, IRIM developed a new methodology, the Digital Transparency Index aiming to accurately assess digital transparency of government organizations, which further contributes to identifying development for government digital transparency developments and delivering open

information to citizens.

During the thirteen years of implementing this assessment, content and availability of information on the websites of government organizations has gradually improved, but in some years it has decreased. If we look at it numerically, it was observed that elections and changes in the structure of the government have an impact on digital transparency.

**Figure 6**

*Changes in digital transparency, by years*



The digital transparency index of government organizations has increased at 69% by 3.8% from last year (65.2%), ranking at a 'satisfactory' level and being the highest growth in the last 3 years. In the last 5 years, the digital transparency index has increased by 2.5-3% each year, showing sustainable growth, and in 2023, for the first time the index improved from 'moderate' to 'satisfactory' level.

Estimating based on the growth rate of the last 5 years (2%-2.5%), if the improvement continues, the digital transparency index could reach scores of 85% at a 'good' level in 2030. This will increase citizens' participation in government activities and will have a significant impact on the transparency and accountability of governance.

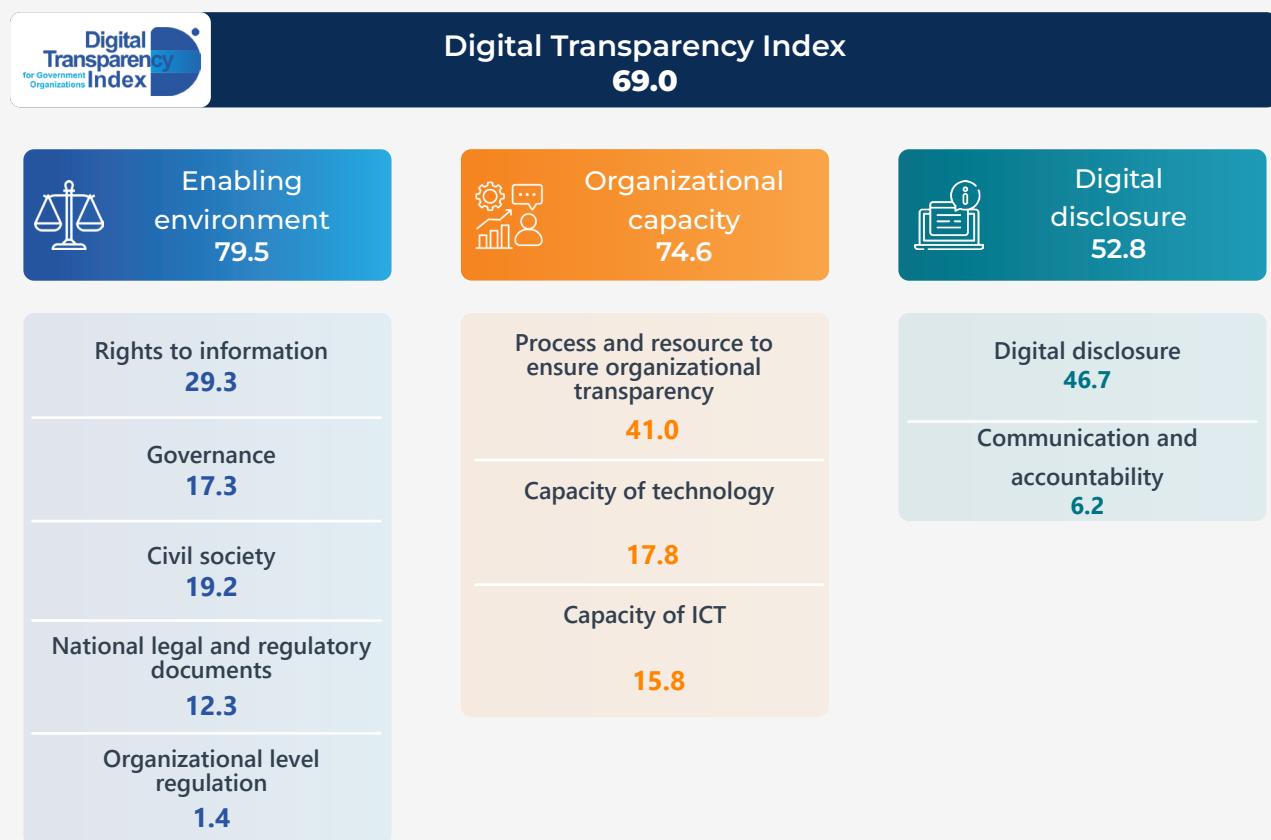
<sup>1</sup> Бүрэлдэхүүн тус бүрийн индекс дэд бүрэлдэхүүний нийлбэрээр тодорхойлогдоно.

## 2.2. Results for each domain

The 2024 assessment is the third since the new act of the Law on Transparency of Public Information. This provides an opportunity to measure changes in digital transparency over the past three years. The observations and results for each domain are detailed in the next section.

**Figure 7**

*Integrated results of the digital transparency, by domains*



### 2.2.1. Domain 1: Policy environment

Since the support and framework of the policy environment is a fundamental priority for the implementation and improvement of digital transparency of information, it is crucial to pay attention to the extent to which this policy environment is formed. The extent to which the enabling conditions for transparency in the policy and regulatory environment are provided are assessed in detail at international, national and organizational levels. The results of this domain are calculated based on international governance transparency indicators and policies and procedures adopted to ensure digital transparency of information at three levels: international, national and organizational levels. The policy environment index is calculated as the

sum of these three levels of indicators.

Policy environment rated as 'satisfactory' (79.5%). Comparing the results to 2023 (79.2%) is a slight increase of 0.3%. If we break down the results based on the 5 sub-domains, all have shown an improved performance. It can be concluded that the positive results may have contributed from the continued progress of organizations reforming internal rules and regulations in 2023 in accordance with the new act adopted in 2022. A breakdown of the policy environment assessment by sub-domains show the following results.

**Table 2**
*Enabling environment sub-indicators*

Sub-indicators	2023 index	2024 index	Change
Enabling environment	79.2%	79.5%	+0.3%
<b>Internationally</b>			
Rights to information	27.0%	29.3%	+2.3%
Governance	16.0%	17.3%	+1.3%
Civil society	23.0%	19.2%	-3.8%
<b>Nationally</b>			
National legal and regulatory documents	12.0%	12.3%	+0.3%
<b>Organizationally</b>			
Organization level regulation	1.2%	1.4%	+0.2%

This year, sub-domains except for civil society, have shown improved results, while the civil society sub-domain has consistently decreased in the last 2 years. This is due to the government's attempts to introduce overly detailed laws, rules and regulations to regulate and control the activities of civil society organizations (CSOs), and further affects the funding and freedom of operation of CSOs. For example, reform of the NGO Law and transparency requirements created a risk of reduced funding and participation of CSOs. Also, the increase of political involvement and pressure on the activities of CSOs will negatively affect their independence, the lack of governance transparency and corruption control, which will further reduce citizens' trust in the effectiveness of CSOs, and the economic difficulties and the deterioration of citizens' quality of life will reduce the activity of citizens and make them less interested in participating in civil society activities.

International level sub-domain was calculated based on sources from (i) internationally recognized within this field, (ii) 9 indexes that Mongolia participated in, and the three sub-domains were Right to Information, Governance, and Civil Society. The results showed that international indexes evaluating Mongolia's digital transparency resulted in "satisfactory" level, or the evaluations of each index had a score of more than 80%.

Right to information and governance indicators calculating indexes showed slightly improved and maintained results from previous ones, which contributed to the slight increase in these indicators.

For example, considering the updated results of international indexes in 2024, compared to 2022, the Rule of Law Index dropped from 62nd to 64th place, by 2, while retaining its 55th place in the Freedom House Index. Also, the average of 4 indicators calculated from the World Bank's Governance indicators is 45%.

However, the civil society indicator from the policy environment domain is the only one that has decreased. It dropped 8 points from 88th place in the World Press Freedom Index to 109th place in 2024. Also, in 2024, according to CIVICUS, which calculates the indicators of civic space, has decreased by 7 points from the previous assessment, from "narrowed" category to the "obstructed" category. The main reason for the decline was said to be the crackdown on independent media and the retreat from peaceful protests. On the contrary, in the E-Government Development Index (2024 EGDI), Mongolia ranked 46th out of 193 countries, and in the EGDI's e-Participation Index, which measures civil society indicators, Mongolia improved by 28 places and scored 0.7808, ranking 37th out of 193 countries, up 20 places from 2022's 57th place. These advances show significant progress in the development of digital governance in Mongolia, but the indicators of the right to information and the right to express opinions have been rated lower, which contributes to the decrease in this sub-domain of the DTI. A summary of the sources used are shown in Table 3.

**Table 3**
*Index of Enabling Environment*

Index	Issuing organization	Release year	Ranking of Mongolia	No.of countries covered
Right to Information (RTI) Rating	Centre for Law and Democracy	2024	64	136
Rule of Law Index	World Justice Project	2024	66	142
World Governance Indicators (WGI)	World Bank	2024	68	214
Bertelsmann Transformation Index (BTI)	Bertelsmann Stiftung	2022	26	137
Freedom House Index	Freedom House	2024	55	210
World Press Freedom Index	Reporters without borders	2024	109	180
Civic space ratings	CIVICUS	2024	83	198
Varieties of Democracy (V-Dem)	V-Dem Institute	2022	121	179
E-Government Development Index - E-Participation	United Nations	2024	37	193

National level sub-domain considered the approved laws and regulations related to ensuring the development of documents and information transparency to be followed in the long and medium term of Mongolia. As a result, these documents contain 'satisfactory' content related to information transparency.

Long and mid-term development documents each define these types of content in the form of objectives, and the coordination between them is ensured. In addition, the 2024-2028 action program of the Government of Mongolia includes the following goals for improving information transparency:

- Development of digital governance: Ensuring the transparency and openness of government activities by transferring government services to digital form and providing accessible and timely services to citizens.
- Expanding the integrated E-Mongolia system: improving the "E-Mongolia" system to deliver all government services through a single window policy, simplifying the process of obtaining information and services for citizens.
- Fight against corruption and strengthen justice: Increase the transparency of the activities of public organizations and improve the mechanisms of corruption prevention and control.
- Increase citizen participation: Strengthen transparent and open governance by ensuring citizen participation in public policy and decision-making processes and improving information exchange.

The Law on Transparency of Public Information was approved on December 17, 2021, and 12 regulations were approved in 2022 and are being implemented in accordance with the law. Of these a decision was made to publicly publish 606 open data of 70 government organizations in accordance with the procedure for creating a list of open data. Looking at the implementations of the regulations, "Requirements, conditions and procedures for creating and publishing open data from the data respondent" and "Operational regulations of the integrated state open data system" are very well implemented, while the implementation of "Common regulations for publishing, updating and monitoring open information in digital form" is weak.

Many policies and regulations like these have been approved and implemented by the Government of Mongolia, and since 2024, the Ministry of Digital Development and Communication has started working on providing government information to citizens through a single window, and making the websites of government organizations into one standard, already integrating 4,693 websites into gov.mn. It aims to save costs by providing more accessible and understandable information to citizens.

Organizational level sub-domain assessing 8 indicators show that 55 out of 98 organizations or 56% organization did not publish on their websites documents of internal regulations to ensure information transparency within the framework of the law on the right to access information and the regulations issued thereunder. For the remaining 43 organizations, although internal regulatory documents have been posted on their websites, the contents of identifying objectives to implement, provision of potential resources, and monitoring mechanisms were not included. Most organizations included provisions related to ensuring digital information and information transparency in their mid-term policy documents, but they were very generic. Only 8.2% of organizations sufficiently covered and updated their internal procedures within the last two years in accordance with the "Law on Transparency of Public Information" accompanying regulations that are fully aligned and indicators that ensure stability of internal process for information transparency. This result means that compared to the previous year (6 organiza-

tions), only two more organizations approved and published new regulations related to information transparency. Organizations ranked at 'satisfactory' level include:

1. Ministry of Defence
2. Agency for Land Administration and Management, Geodesy and Cartography
3. National Statistics Committee
4. Ministry of Foreign Affairs
5. General Executive Agency of Court Decision
6. General Office of Archives
7. Ministry of Education and Science
8. Forestry regulations

When organizations approve internal rules, regulations, and orders to ensure digital transparency of information, defining the extent of information, classifying information, preparing information, determining the responsibility, determining the rights and obligations of officers, and clearly reflecting the renewal period and the mechanism for monitoring implementation will increase the chances of effective implementation.

## 2.2.2. Domain 2: Organizational capacity

The capacity and readiness to continuously supply information and organize the information process is an important factor in creating the transparency of the organization.

Therefore, every year, the organizational capacity domain is evaluated, and the data sources for this domain are (i) primary data obtained from relevant employees of the government organization under evaluation, and (ii) indicators indicating the compatibility of website technology. In 2024, the organizational capacity domain was assessed as 'satisfactory' (74.6%), which is a 1.8% increase from the previous year. However, this increase is the lowest compared to the five-year average improvement of 3.9%. This indicates that the trend of continuous growth for organizational capacity has been hindered to a certain extent.

In recent years, organizations have been actively participating in surveys with their organization's transparency specialist in order to calculate

some of the indicators for the organizational capacity domain. However, in 2024, due to the full introduction of the system of entering information into the Shilen.gov.mn platform, there seems to be a tendency of decreased interest in participating in similar studies. For example, in 2023, a total of 86 organizations participated in the survey, but in 2024, this number decreased to 51. There might be risks that this trend will continue and the number of participants will continue to decline.

**Table 4**  
*Organizational capacity index*

Sub-indicators	2022 index	2023 index	Change
Organizational capacity	72.8%	74.6%	+1.8%
Process and resource to ensure organizational transparency	41.1%	41%	+0.1%
Technological capacity	15.9%	17.8%	+1.9%
ICT capacity	15.8%	15.7%	-0.1%

A closer look at the sub-domains of the organizational capacity domains shows that capacity of technology shows steady growth each year. This sub-domain evaluates whether the organization's website is suitable for use in terms of technology, and 80% of all organizations meet all requirements except website structure. It is important to note that the rapid improvement of these websites results in citizens using digital platforms to get necessary information quickly and without bureaucracy, from any place and device.

However, the capacity of ICT sub-domain and process and resource to ensure organizational transparency sub-domain has only grown by 2% in the last 5 years. In 2022, 38% of surveyed organizations believed they had a strategic plan or program for digital transparency, and this number rose to 48% in 2023. Yet in 2024, the percentage of organizations that said they had a strategic plan or program was 51%, only a 3% increase from the previous year. A strategic plan for digital transparency identifies ways to deliver information to citizens in an accessible and understandable manner, enabling faster delivery of services. Furthermore, it helps to reduce information duplications, bureaucracy, and costs. Therefore, having this strategy and plan for government organizations is a basic indicator for the development of digital transparency.

In 2023, 65.8% of the government organizations evaluated had a dedicated employee, department or unit responsible for disclosing information, while 29.3% of employees had combined roles. On the other hand, 4.9% answered that there is no employee responsible for this role or it is not clear if there is one. In 2024, although the number of organizations with dedicated employees and units responsible for information transparency has remained the same as the previous year's level, there is improved progress as all organizations have an employee in charge of the said role. This indicates that all organizations may have a designated data entry officer in charge of uploading necessary data to the Shilen.gov.mn platform.

As information becomes open to the public, data quality, protection and security are critical issues to

pay attention to. Accomplishing these requirements needs not only human resources, but also budgets for costly hardware, software, and security measures.

In the previous year, 62% of government organizations answered that the budget and funds related to disclosure of information are set to some extent, and in 2024 this number increased to 65%. However, the above-mentioned budget is said by 70% of majority organizations to be insufficient. Comparing the growth of the organization's digital transparency index and budget adequacy responses over the past five years, despite the increase in the index, there is still feedback that the budget is insufficient.

Within the organizational capacity domain in 2024, one mentionable point is the 10% increase from the last 2 years in the number of organizations that have started providing server security regulations. Since government organizations store citizens' personal information and confidential documents, the protection of these data affects the responsibility and credibility of the government.

In January 2024, the Ministry of Digital Development and Communications organized a Cybersecurity capacity maturity model seminar to introduce internationally applicable standards and documents. This seminar was attended by over 100 employees in charge of cyber security issues of organizations and universities with critical information infrastructures of the government administration.

Regularly monitoring and evaluating the organization's digital disclosure performance is one of the most underperformed indicators of each year. It was mentioned in previous years that this was due to the fact that the organization's quarterly and year-end evaluations did not include evaluations related to the implementation of digital information transparency, as well as the criteria and strategies for evaluating performances were not approved. However, this year, 61% of the organizations surveyed said that they regularly monitor and evaluate their digital transparency performance in connection with the government's glass operations, a 10% increase compared to last year.

The next issue is updating the information on the

website in a timely manner. Although more than 90% of all organizations regularly update the latest news and information, HR information and supporting documents to updated information is not disclosed in time. While it is possible to view financial information annually and quarterly in the glass account, HR information updates are not available. Since the Law on Transparency of Public Information does not require evidence that the information was updated, there is a major struggle in identifying when information was updated during our annual assessments. Updated information on human resources allows citizens and the public to clearly view the structure of the organization, the status and responsibilities of employees. Regularly updating human resources information and regularly releasing information such as vacancies, appointments, movements of certain positions helps transparency and monitoring of organizational performance.

The following are the indicators that have not changed compared to previous years:

- Developing an action plan to improve digital transparency based on internal and external assessments,
- Receiving training in information and communication technology (ICT) and improving digital transparency,
- Using the number of visitors to the website for digital transparency improvement plans and results,
- Open database and news that are regularly updated within the organization.

In other words, the lack of change in these indicators has the main effect of stopping the growth of the organizational capacity domain.

Using website traffic data is an important tool for understanding organizations' digital strategies and visitors' attitudes. This number provides valuable information that can be used to determine the need for digital disclosure and to make necessary changes and improvements.

The assessment showed that only 27% of 98 government organizations publicly displayed the num-

ber of visits to their websites. In addition, 4 organizations had a value of "0" in their visitor numbers, showing that there is no valid number even if the section is visible on the website.

Among government organizations, the most visited site was the National Statistics Office, with 2,641 visits per day and 82,378 visits per month. This shows that statistical information is highly demanding and used by the public. Second is the National Police Agency with 1,400 visitors per day. Following is the General Department of Labor and Welfare Services and the Cabinet Secretariat Office. On the contrary, it is worth mentioning that the least visited websites are of provincial administrative offices.

During the study, it was observed that the number of visitors for some websites were not accurate. For example, Uvs province's website states that it has 793,290 visitors per day, as well as 793,290 per week, indicating a possible system error.

Additionally, government organizations vary in the format in which information about visitors is displayed. Some sites show daily, monthly, and annual visitors, while others only show weekly and total visitors. Also, when the language was set in Mongolian, 4 websites of organizations showed information that only was in English. This can have a negative impact on the availability of digital transparency and make it difficult to access information for visitors.

Although the number of website visitors is a crucial indicator for defining the organization's digital openness for the public, only 27% of government organizations disclose this information. .

In the future, government organizations need to further standardize access information, monitor whether it is working reliably, and ensure the accuracy of information. In the current context, the direct use of some of the insufficient and inconsistent disclosed information on these websites in studies and research still remains risky.

## 2.2.3 Domain 3: Digital disclosure

This domain will identify whether the open information disclosed by the government organizations on the website are published according to the periods established by the law. In doing so, the content of the information published by the government organization on its website will cover the 'open information' specified in the Law on Transparency of Public Information and will focus on how well it complies with the law. It will also be aligned with the Law on Glass Accounts, the Law on Procurement of Goods, Works, and Services with State and Local Property Funds and other regulations.

The digital disclosure domain was assessed at a 'moderate' (52.8%) level. As the digital disclosure

domain had been declining in the last two years due to the newly approved Law on Transparency of Public Information, it improved by 5.3% compared to last year. Before the adoption of the law, this domain was at 'moderate' level, and dropped to 'unsatisfactory' level after the law was adopted. However, the score increased in 2024 with a 'moderate' level, meaning that the implementation of the Law on transparency of Public Information is stabilizing within organizational levels.

The following results have been broken down by each sub-domain.

**Table 5**

*Digital disclosure index*

#	Sub-indicators	2023 index	2024 index	Change
1	Digital disclosure	47.5%	52.8%	+5.3%
2	Disclosed information	42.0%	46.7%	+4.7%
3	Communication and accountability	5.8%	6.2%	+0.7%

### Disclosed information

In this disclosed information sub-domain, 5 indicators are assessed. This sub-domain had seen stagnant growth in recent years, but showed improvement by 4.7% this year. The following is the summary of each indicator:

### Transparency and openness of operations

This section assesses whether the open information required by law related to the activities of the organization is located on their websites. All organizations had relatively published necessary information such as organizational mission, operational strategic goals, objectives, priorities, organization structure and functions, and addresses.

Over the past three years, the indicators that showed the most improvement were evaluation reports on the consequences of law enforcement, reports on the implementation of development policies and planning documents, laws

and regulations, government decisions, and other legal documents in operation, and more than 80% organizations had published mentioned documents. This figure was 50% in the first year of implementation of the Law on Transparency of Public Information.

However, the lowest performing score was the reports and news on resolution of complaints and requests. Section 8.2.8 of the Law on Transparency of Public Information states that reports on the resolution of complaints and requests should be kept transparent. It is important to maintain public trust, legal accountability, and access to communication by keeping open reports of complaints and requests. The Agency for land administration and management, geodesy published a unified report on applications, complaints, and decisions being a role model organization for 2024.

## Transparency and openness of human resources

In the human resources indicator, information about job vacancies, employee selection procedures, and code of conduct for employees are relatively adequate for all organizations.

The indicators with the most improvement in the last three years are indicators of human resource

Figure 8

## Transparency and openness of human resources exemple

strategies and the procedure for monitoring and evaluating the implementation of the strategy. This indicator is disclosed in 61% of organizations, and in the first year of implementation of the Law on Transparency of Public Information, it was 49%.

Although vacancy information, selection procedures, codes of conduct, and procedures for evaluating human resource performance are disclosed at a sufficient level, further steps need to be taken to ensure transparency in human resource management and disclose relevant information in detail. For example, information related to social security programs for government employees, employee training, development programs, reporting of qualification activities, job descriptions, transferring and rotation announcements, selecting procedures of interviews and decision-making need to be disclosed respectively.

Ministries are showing sufficient performance in these topics and the Ministry of Health, Ministry of Education and Science, and Ministry of Fi-

rance are leading in ranking for these indicators.

The openness of human resource management processes, decision-making and monitoring systems provide an opportunity to assess the organization's activities, and creates transparency and responsible monitoring over its activities. Therefore, government organizations' inclusion of information related to the transparency of human resource management helps to achieve important goals such as public relations, justice, responsible governance, increasing public trust, and fighting corruption.

## Transparency and openness of finance and procurement

The Law on "Glass Accounts" aims to make the information on public and local property spending, budget revenues and expenses transparent and open to the public.

Table 9

## Transparency and openness of finance and procurement exemple

Ихэл / Их Тод / Төсийн Салхийн Удирдлагын Их Тод, Үр Ашигтай Байдал Төсөл	
Их Тод	<b>Төсвийн санхүүгийн удирдлагын Их Тод, үр ашигтай байдал төсөл</b>
Төнөр	
Үзүүлэлт / Аялал	
Тусгай зөвшилцөл	
Нийтэн бодлыг бургтай	Худалдан авах ажиллагаа
Засгийн газрын өрхийн мэдрээлэл	
Нийтийн мэдрээлэл	Тайлан
Судалгаа, Шинжилгээ	
Төсвийн санхүүгийн удирдлагын Их Тод, үр ашигтай байдал төсөл	
Орондийн ААНХАТ	Чадвах бэлхүүлэх

In accordance with this law, government organizations and local administrative bodies are obliged to open a special menu called "Glass account" on their websites and publish the following information:

- Budget and performance: Information such as revenue plans, performance, financial reports, audit conclusions to be collected within the state and local budgets,
- Investments, tenders and purchases: Investment plans, tender announcements, procurement information,
- Others: Information such as work mission expenses, donations, and aid spending,

Regularly updating this information and keeping it open to the public is important for ensuring the transparency and accountability of the financial activities of government organizations. All organizations have adequately disclosed information such as previous year's budget performance, current year's budget, the next year's budget plan, execution of budget performance, semi-annual financial reports, monthly performance reports of consolidated budget, budget savings and supporting explanations.

The lowest performing indicator in the evaluation is the information section of the actions taken according to the audit report and recommendations. According to Article 8.4.9 of the Law on Transparency of Public Information government organizations are obliged to publish information on the measures taken in accordance with audit reports and recommendations on their websites. However, there are cases where some organizations do not fully comply with this obligation, do not upload information on time, or do not publish it at all. In 2023, 45% of organizations published the mentioned information on their websites, while in 2024, this number increased by 3%. This year, it is important to emphasize that the Ministry of Road and Transport Development has published information on the measures taken in accordance with the audit report and recommendations benchmark to other organizations.

The next lowest performing indicator is auditing for the financial reports. It is the responsibility of the budget portfolio governors to make the measures taken in accordance with the conclusions and recommendations of the audit is publicly disclosed within the legal period. According to the Law on Glass Accounts, government organizations must submit the full text of the audit report on the budget package by April 25 of the current year; The information must be posted in accordance with the provision that the measures taken in the audit report and conclusions will be regularly reported by July 1st of the current year. In 2023, almost half of all organizations (51.8%) had not posted their financial audit report. How-

ever, this percentage was 49% in 2024, showing no changes of improvement. .

Annual public disclosure of audit findings increases the ability of citizens to monitor the financial activities of government organizations and prevents corruption and irregular activities. Auditing of financial reports is an important tool for evaluating the effectiveness of budget spending, legal compliance, and accountability of an organization, and transparency is ensured by the organization publishing this information annually. It is important to emphasize that the Ministry of Economy and Development has published their audit findings on the financial report, becoming a benchmark for other organizations. The following are the improvements that can be made in terms of the Glass account logging:

- There are many violations in which the information to be uploaded is delayed in terms of time. The most delayed information is the approved budget of the organization. Organizations are required to submit relevant information by January 10 of each year. The National Audit Office's 2023 report includes recommendations related to the delay in uploading account information. Due to the risk of limiting the ability of citizens to monitor the issue of lateness, it is necessary to strictly monitor the process and schedule of information uploading.
- There were a lot of cases where budget, financial reports, investment and tender information were missing and unclear. In order to ensure the completeness and clarity of the information, it is important to use a standardized format and introduce a mechanism for reviewing the information before publishing.
- Some organizations had many technical errors and malfunctions and made it difficult fully review relevant information.
- The information on the glass accounts were in complicated professional language, so it may be difficult for citizens to understand. Interactive pages with simple and concise descriptions, graphs, and additional analysis features are recommended to be implemented.

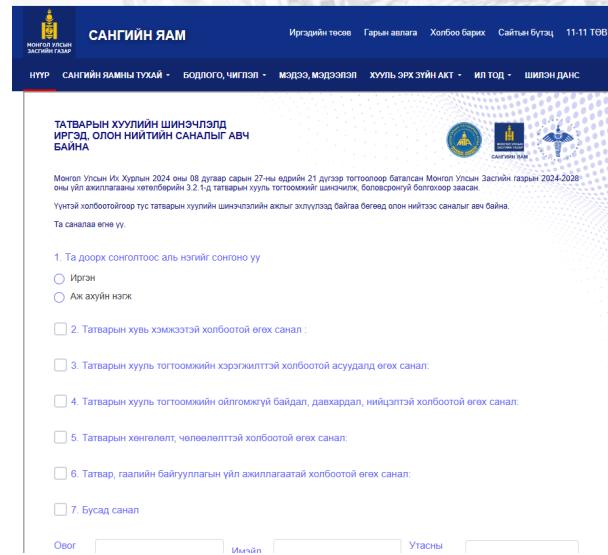
When the transparency of procurement is measured by the requirements described in the law, most of the organizations have openly disclosed relevant information such as procurement plans, reports, tender invitations and supporting documents. In 2023, 40% of organizations disclosed tender results and supporting explanations, while in 2024, this percentage increased by 10% to 51%. A clear and understandable explanation of the reasons for results increases the trust of citizens and other stakeholders. This information is important to ensure fair competition between bidders. Bidders can know what the reason was and understand the future competitive opportunities and criteria. Therefore, in the future, it is necessary for government organizations to disclose the legal grounds and reasons for winning and not winning tenders on their websites. In addition, most organizations still do not upload procurement information, procurement audits, and other inspection reports and conclusions with a value of MNT 5 million or more. Since 2023, there has been no change in this indicator.

## Communication and feedback

Communication and feedback with citizens creates an opportunity to listen to their suggestions, criticisms and initiatives. This allows government organizations to better understand the needs of society and improve their quality of service. Article 8.2.1 of the Law on Transparency of Public Information states that organizations are responsible for making their information available to the public in an open and accessible manner. For example, having a section on the website of government organizations to receive citizens'

**Table 10**

Communication and feedback example



feedback ensures transparency, accountability and citizen participation to help and implement the basic principles.

The evaluation of the communication and feedback indicator has grown at an average annual rate of 1%, while this year it increased by 0.7%. Links to social networks, direct links to services, and availability of any direct communication tools are equally adequate across all organizations.

However, having answers to frequently asked questions, polling, and reports of resolution to complaints and requests are still the lowest performing indicators.

Receiving feedback online allows for faster and more secure communication with citizens. Therefore, we believe that it is necessary for government organizations to have a section that conducts surveys and polling, and to openly post replies to those surveys on their websites.

## 2.3. Organizations results

In this section, the results of the index are classified by organization level, and the following 6 types of organizations are covered every year.

The digital transparency index increased by 3.8% from last year in 2024. When looking at the classification by type of organization, the digital transparency of these organizations have all increased

In particular, among these organizations, the regulatory organizations, administrative divisions and districts have the highest improvements. According to the average of the last three years, ministries and Implementing organizations lead the annual improvement scores, but for the first time, administrative divisions and districts have shown the highest growth.

Looking at each domain, ministries have the highest ratings in all three domains.

In the past five years, ministries have had improvements of 2-3%, but this year it has the lowest growth of 1.7%. Regulatory organizations and administrative divisions and districts have had an average annual growth rate of 1.5-2%, but this year it showed a growth of 4.5-5%, being the highest in the last 5 years.

It can be concluded that although ministries and implementing organizations have been taking certain measures in the past years to improve digital transparency, results may have decreased due to the change of government. However, it can be assumed that administrative divisions and districts and regulatory organizations have a relatively stable structure and are taking steady measures.

Please refer to Appendix 2 of the report for each organization ranked by category.

**Table 6**  
*Organizational transparency, by organizations*

#	Types of organization	Enabling environment	Organization-al capacity	Digital disclosure	2023 index	2024 index	Change
1	Ministries	80.1%	77.8%	59.3%	70.7%	72.4%	+1.7%
2	Implementing organizations	79.8%	76.5%	50.3%	66.8%	68.8%	+2.0%
3	Regulatory organizations	79.1%	66.0%	55.1%	63.1%	68.0%	+4.9%
4	Provincial government organization	79.1%	76.4%	50.6%	66.1%	68.7%	+2.7%
5	District government organizations	78.4%	70.7%	55.0%	63.8%	68.0%	+4.5%
6	Parliamentary organization	79.9%	70.5%	52.0%	65.7%	67.5%	+1.8%
<b>General average</b>		<b>79.5%</b>	<b>74.6%</b>	<b>52.9%</b>	<b>65.2%</b>	<b>69.0%</b>	<b>+3.8%</b>

### 3. Conclusions and recommendations

The Digital Transparency Index of government organizations in 2024 reached 69%, an increase of 3.8% from the previous year, indicating steady growth. For the past 5 years, the index has increased by 2.5%-3% annually, and the improvement in digital services and transparency of government organizations has shown that the efforts of government and local administrative organizations to improve digital governance are paying off.

If this growth trend continues, in 2030 the index could reach around 85% and be rated as "good". This will increase citizens' participation in government activities and have a significant impact on improving the transparency and accountability of governance.

Therefore, it is important to continue to improve the digital transparency of government organizations to increase the level of transparency and accountability.

The policy environment domain was assessed at 'satisfactory' level (79.5%). This result is a slight increase of 0.3% compared to the results of 2023 (79.2%). When analyzed by 5 sub-domains of the policy environment, 4 sub-domains had improved. Specifically, though the right to information and governance sub-domains have advanced their rankings in terms of their international indexes, the civil society sub-domain has significantly (3.8%) decreased. In particular, the main reasons are decreased rankings in the freedom of expression and freedom of the press indexes.

However, the regulation of policies and procedures implemented at national and organizational levels in this area has made minimal improvements. In this regard, the newly approved government documents from 2024 included certain actions, and the process of reforming the internal regulations issued by organizations in accordance with the law in 2023, in connection with the Law on Public Information that began implementation in 2022 contributed to positive results. With the establishment of a separate structure, the Ministry of Digital Development and Communications in the Government of Mongolia, has strengthened the

digitalization of government organizations, allowing information to be disseminated transparently and quickly to the public. However, most of the organizations that have made provisions for increasing digital transparency in their long and mid-term development documents are mostly still using traditional methods of information dissemination in the form of conferences and meetings. Overall, this domain shows that the infrastructure for information disclosure is improving, but there still needs to be further improvement in internal information disclosure processes of government organizations. It should also be noted that although the process of providing information by government organizations is 'satisfactory', it is still necessary to improve the policy environment for the right of citizens, the public, and the media to express their opinions.

The organizational capacity domain was assessed at a 'satisfactory' (74.6%) level and this shows a 1.8% increase from the previous year's result. However, this growth was the lowest compared to the five-year average growth of 3.9%. This decrease indicates that the trend of continuous growth of the organizational capacity has hindered to some extent.

In 2024, due to the complete introduction of the data entry system to the Shilen.gov.mn platform, there is a risk of declining interest in participating in similar types of surveys in the future. In addition, the ministry in charge of www.gov.mn to integrate all the government organizations and their websites into a unified platform may have influenced the decline of some organizations' participation in information disclosure processes. However, the capacity of technology sub-domain has shown steady growth every year. This sub-domain evaluates the technical usability of the website, and 80% of all organizations meet all requirements except website structure. As a result of websites of organizations showing rapid improvement, citizens can use digital platforms to get necessary information without bureaucracy and in a timely manner, from any place and any device, further contributing to the improved score of this domain.

Key findings in the organizational capacity domain

include:

- Only 27% of the 98 government organizations disclose the number of visitors to their websites, while the remaining organizations still do not disclose such information. Some websites may not disclose the accurate number of visitors on their websites. For example, Uvs province's website states that it has 793,290 visitors per day, but also has the same number of visitors weekly, indicating a possible system error.
- While regular monitoring and evaluation of digital transparency performance is improving, it still remains insufficient. In 2024, 61% of surveyed organizations regularly monitored and evaluated their digital transparency performance in relation to the Glass operations, a 10% increase from last year.
- In order to improve the effectiveness and reliability of digital transparency evaluation, government organizations need to standardize visitor information, ensure the accuracy of information, and improve monitoring systems.
- Lack of financial resources delay the implementation of digital transparency. Although in 2023, 62% of government organizations answered that they have a certain budget allocated, and that number increased to 65% in 2024, 70% of organizations pointed out that the budget is still insufficient.
- While the capacity of technology is steadily increasing, the implementation of digital transparency policies are slow. In the last 5 years, the number of organizations with a digital transparency strategy has increased by only 2%, indicating the need to intensify policy and planning in this area. It is essential to have a strategy and plan for digital transparency to reduce information duplication, bureaucracy and costs, but as of 2024 the number of organizations with named strategy reached only 51%, which is still insufficient.
- The mentionable improvement of all organizations having an officer responsible for disclosure of information in 2024, shows the influence of the Shilen.gov.mn platform.
- Although the digital transparency performance of government organizations is improving, HR information not being updated and supporting documents to updated information not being published shows that digital transparency is not being fully fulfilled.

The domain of digital disclosure was evaluated at a 'moderate' (52.8%) level and this is an increase of 5.3% compared to the previous year. The disclosed information sub-domain increased in 2024 after declining in the last two years due to the newly approved Law on Transparency of Public Information. Before the adoption of the law, this sub-domain was evaluated at a 'moderate' level, but after the adoption of the law, it declined to an 'unsatisfactory' level. However, in 2024, it returned to a 'moderate' level which indicates that the implementation of the Law on Transparency of Public Information has stabilized at the level of government organizations, and their attitudes towards digital disclosure is improving again.

Key findings in the digital disclosure domain include:

- The most improvements were shown where more than 80% of all organizations have published necessary information on their websites, such as reports on the assessment of the consequences of law enforcement, the report on the implementation of development policies and planning documents.
- Report of replies and solutions to complaints and requests were the lowest scoring indicators and remain important data to improve public trust, legal accountability and access to communications.
- There are several flaws in the activity of publishing information on glass accounts, as there are still issues of delayed, incomplete, and unclear published information being uploaded.
- Government organizations are obliged to openly publish the measures taken in accordance with audit reports and recommendations, but in 2024, the level of information was only 3% (48%) higher than the previous year.
- Despite the improvement in procurement transparency, many organizations still do not upload procurement information and audit reports worth more than MNT 5 million.
- Clear disclosure of tender results and reasoning is essential to ensure transparency and fair competition. A positive improvement was the results in 2024 being 51%, having increased from 40% in 2023.
- Receiving citizens' comments and requests online and openly disclosing responses is an important tool for improving the accountabil-

ty and openness of government organizations, and very important to pay more attention to this in the future.

- Based on the results of the evaluation, the following suggestions are made for government organizations to improve their digital transparency in the future. This includes:
- To publish reports and news of replies and solutions to complaints and requests in a timely manner,
- To disclose in detail the measures taken in the area of transparency of human resources management,
- Timely disclosure of information on measures taken according to auditing reports and its recommendations,

- To ensure no delay in the entry of information to the glass account,
- In order to ensure the completeness and clarity of the published information and data, to use a standardized format and introduce a mechanism for reviewing the information before disclosure,
- Ensuring the consistent workability of the glass account,
- Implementing additional features of interactive pages, graphs and analysis with understandable and simple terms of explanation in glass accounts
- To regularly update websites with frequently asked questions, polling sections, and complaints resolution updates

# Annex 1. Methodologies: Indicators and respective scores

Code	Indicator	Total score
<b>E. Policy environment</b>		<b>57</b>
<b>E1. Rights to information (international)</b>		<b>8</b>
E1.1	Right to information	2
E1.2	Scope of information	1
E1.3	Procedure on access to information	1
E1.4	Refusal	1
E1.5	Make complaint	1
E1.6	Sanctions and protection	1
E1.7	Awareness measures	1
<b>E2. Governance (international)</b>		<b>12</b>
E2.1	Law implementation	2
E2.2	Voice and responsibility	1
E2.3	Regulation features	1
E2.4	Government effectiveness	1
E2.5	State of the government organizations	4
E2.6	Government actions/measures	3
<b>E3. Civil society (international)</b>		<b>15</b>
E3.1	Civic participation	2
E3.2	Freedom to publish	1
E3.3	State of Civil Society	1
E3.4	Online participation	1
E3.5	Civic Freedom Monitor (legal)	1
E3.6	Citizens' participation in governance	4
E3.7	Freedom	5
<b>E4. National legal and regulatory documents</b>		<b>14</b>
E4.1	Law and procedures	5
E4.2	Policy planning	5
E4.3	Implementing body	3
E4.4	Accountability mechanism	1
<b>E5. Organizational level regulation</b>		<b>8</b>
E5.1	Regulation	8
<b>O. Organizational capacity</b>		<b>29</b>
<b>O1. Process and resource to ensure organizational transparency</b>		<b>12</b>
O1.1	Adequacy of the resource	3
O1.2	Leadership	5
O1.3	Capacity for continuous improvement	4
<b>O2. Capacity of the technology</b>		<b>11</b>
O2.1	Capacity of the technology in use	11
<b>O3. Capacity of ICT</b>		<b>6</b>
O3.1	ICT capacity	6
<b>D. Digital disclosure</b>		<b>64</b>
<b>D1. Disclosed information</b>		<b>56</b>
O1.1	Operational transparency	22
D1.2	Human resource transparency	9
D1.3	Budget transparency	14
D1.4	Procurement transparency	11
<b>D2. Communication and accountability</b>		<b>8</b>
D2.1	Accountability	8
<b>Total</b>		<b>150</b>

## ANNEX 2. Ranking of each type of organization

Good | >80 | Satisfactory | 65-79 | Moderate | 50-64 | Unsatisfactory | 35-49 | Poor | <35

### Digital transparency index of ministries

#	Organizations	Digital transparency index	Enabling environment	Organization-al capacity	Digital disclosure
1	Ministry Road and Transport Development	80.0%	78.1%	92%	70%
2	Ministry of Food, Agriculture, Light Industry	78.7%	78.1%	93%	65%
3	Ministry of Environment and Tourism	77.0%	79.1%	91%	61%
4	Ministry of Finance	76.7%	78.1%	84%	68%
5	Ministry of Digital Development and Communications	74.7%	78.1%	81%	65%
6	Ministry of Labor and Social Protection	72.9%	78.6%	91%	49%
7	Ministry of Education and Science	72.7%	86.1%	68%	64%
8	Ministry of Foreign Affairs	72.0%	84.1%	77%	55%
9	Ministry of Construction and Urban Development	71.0%	81.1%	65%	67%
10	Ministry of Industry and Mineral Resources	70.7%	78.1%	64%	70%
11	Ministry of Defense	70.4%	86.1%	68%	57%
12	Ministry of Health	70.0%	83.1%	77%	50%
13	Ministry of Culture	69.4%	78.1%	72%	58%
14	Ministry of Economy and Development	68.0%	78.1%	74%	52%
15	Ministry of Justice and Internal Affairs	67.4%	78.1%	74%	50%
16	Ministry of Energy	67.0%	78.1%	74%	49%
<b>Index of Ministries</b>		<b>72.4%</b>	<b>80.1%</b>	<b>77.8%</b>	<b>59.4%</b>
<b>Average index of Mongolia</b>		<b>68.9%</b>	<b>79.5%</b>	<b>74.6%</b>	<b>52.8%</b>

### Digital transparency index of regulatory organizations

#	Organizations	Digital transparency index	Enabling environment	Organization-al capacity	Digital disclosure
1	Physical Education and Sports Commission	74.2%	83.6%	89%	50%
2	General Police Department	72.9%	83.6%	78%	57%
3	Authority for Fair Competition and Consumer Protection	69.4%	78.1%	80%	50%
4	State Special Security Service	69.4%	78.1%	68%	62%
5	General Authority for Border Protection	66.4%	78.1%	58%	63%
6	National Emergency Management Agency (NEMA)	65.9%	81.6%	63%	53%
7	Agency for Standardization and Metrology	65.7%	78.1%	68%	51%
8	Cultural and Arts Authority	65.0%	78.1%	65%	52%
9	General Staff of the Armed Forces	65.0%	78.1%	69%	48%
10	General Intelligence Agency	64.4%	78.1%	55%	60%
11	Civil Aviation Authority	63.5%	83.6%	64%	43%
<b>Regulatory organization index</b>		<b>67.4%</b>	<b>79.9%</b>	<b>68.8%</b>	<b>53.5%</b>
<b>Average index of Mongolia</b>		<b>68.9%</b>	<b>79.5%</b>	<b>74.6%</b>	<b>52.8%</b>

## Digital Transparency index of implementing organizations

#	Organizations	Digital transparency index	Enabling environment	Organization-al capacity	Digital disclosure
1	Agency for Land Administration and Management, Geodesy and Cartography	82.9%	84.6%	96%	68%
2	General Department of Taxation	74.4%	78.1%	86%	59%
3	Forest Agency	74.4%	84.1%	82%	57%
4	General Authority for the Development of Persons with Disabilities	74.2%	83.6%	89%	50%
5	General Office for Labor and Social Welfare Services	73.4%	78.1%	84%	58%
6	Agency for Meteorology and Environmental Monitoring	73.2%	78.6%	83%	58%
7	Physical Education and Sports Agency	73.0%	78.1%	90%	51%
8	General Executive Agency of Court Decision	73.0%	78.1%	89%	52%
9	Water Agency	72.7%	84.1%	77%	57%
10	General Authority for Education	72.0%	78.1%	92%	46%
11	Medicines and Medical Devices Regulatory Agency	71.4%	79.1%	85%	50%
12	General Agency for Forensic Science	70.0%	78.1%	79%	53%
13	State Property Policy and Regulation Agency	69.4%	78.1%	80%	50%
14	General Health Insurance Agency	69.0%	78.1%	91%	38%
15	National Geological Service	69.0%	80.1%	79%	48%
16	Cabinet Secretariat of the Government of Mongolia	68.2%	82.6%	78%	44%
17	Immigration Agency	67.4%	78.1%	74%	50%
18	General Department of Social Insurance	67.4%	78.1%	70%	54%
19	Mineral Resources and Petroleum Authority of Mongolia (MRPAM)	66.7%	78.1%	78%	44%
20	Public Procurement Agency	65.9%	83.6%	74%	40%
21	General Authority for State Registration	65.7%	78.1%	72%	47%
22	General Authority for Child and Family Development and Protection	65.4%	78.1%	66%	52%
23	General Authority for Veterinary Services	64.7%	78.1%	73%	43%
24	Agency for Small and Medium Enterprises	64.7%	78.1%	70%	46%
25	Intellectual Property Office	64.7%	78.1%	71%	45%
26	General Archives Authority	64.0%	84.1%	64%	44%
27	E-Government Regulatory Agency	64.0%	78.1%	54%	60%
28	Investment and Trade Agency	63.5%	83.6%	64%	43%
29	General Customs Authority	63.4%	78.1%	60%	52%
30	General Agency for Specialized Inspection (GASI)	63.0%	78.1%	65%	46%
<b>Implementing organization index</b>		<b>68.7%</b>	<b>79.5%</b>	<b>76.2%</b>	<b>50.3%</b>
<b>Average index of Mongolia</b>		<b>68.9%</b>	<b>79.5%</b>	<b>74.6%</b>	<b>52.8%</b>

Good | &gt;80 | Satisfactory | 65-79 | Moderate | 50-64 | Unsatisfactory | 35-49 | Poor | &lt;35

## Digital Transparency index of local government organizations

#	Organizations	Digital transparency index	Enabling environment	Organization-al capacity	Digital disclosure
1	Uvurkhangai Province	78.9%	78.6%	94%	64%
2	Orkhon Province	75.0%	78.1%	93%	54%
3	Uvs Province	74.4%	78.1%	93%	52%
4	Selenge Province	73.4%	78.1%	89%	53%
5	Dundgovi Province	73.0%	78.1%	89%	52%
6	Zavkhan Province	72.4%	78.1%	94%	45%
7	Khentii Province	72.0%	80.1%	85%	51%
8	Arkhangai Province	71.0%	80.1%	83%	50%
9	Bulgan Province	70.0%	78.1%	75%	57%
10	Bayankhongor Province	67.0%	80.1%	77%	44%
11	Govi-Altai Province	66.4%	78.1%	77%	44%
12	Darkhan-Uul Province	66.2%	79.6%	77%	42%
13	Dornogovi Province	66.0%	80.1%	55%	63%
14	Khovd Province	65.9%	78.6%	78%	41%
15	Bayan-Ulgii Province	65.5%	82.6%	74%	40%
16	Umnugovi Province	65.2%	78.6%	62%	55%
17	Dornod Province	65.0%	80.1%	77%	38%
18	Govisumber Province	65.0%	80.1%	63%	52%
19	Sukhbaatar Province	64.0%	78.1%	51%	63%
20	Tuv Province	63.2%	78.6%	59%	52%
21	Khuvsgul Province	62.9%	78.6%	60%	50%
<b>Local government index</b>		<b>68.7%</b>	<b>79.1%</b>	<b>76.4%</b>	<b>50.7%</b>
<b>Average index of Mongolia</b>		<b>68.9%</b>	<b>79.5%</b>	<b>74.6%</b>	<b>52.8%</b>

## Digital Transparency index of administrative divisions and districts

#	Organizations	Digital transparency index	Enabling environment	Organization-al capacity	Digital disclosure
1	Khan-Uul District	76.4%	78.1%	85%	66%
2	Nalaikh District	74.0%	78.1%	87%	57%
3	Bayanzurkh District	72.0%	78.1%	86%	52%
4	Office of the Governor of Ulaanbaatar City	71.7%	78.1%	85%	52%
5	Bagakhangai District	67.0%	78.1%	69%	54%
6	Sukhbaatar District	64.9%	79.6%	55%	60%
7	Chingeltei District	64.2%	78.6%	64%	50%
8	Baganuur District	64.0%	78.1%	62%	52%
9	Songinokhairkhan District	63.2%	78.6%	57%	54%
10	Bayangol District	62.7%	78.1%	57%	54%
<b>Administrative division index</b>		<b>68%</b>	<b>78.4%</b>	<b>70.7%</b>	<b>55%</b>
<b>Average index of Mongolia</b>		<b>68.9%</b>	<b>79.5%</b>	<b>74.6%</b>	<b>52.8%</b>

Good | >80 | Satisfactory | 65-79 | Moderate | 50-64 | Unsatisfactory | 35-49 | Poor | <35

## Digital Transparency index of parliamentary bodies

#	Organizations	Digital transparency index	Enabling environment	Organization-al capacity	Digital disclosure
1	Bank of Mongolia	74.9%	81.6%	77%	66%
2	Financial Regulatory Commission	70.5%	79.6%	69%	63%
3	National Statistics Office	69.2%	85.6%	69%	53%
4	General Election Commission	68.4%	78.1%	76%	51%
5	National Human Rights Commission of Mongolia	67.0%	78.1%	77%	46%
6	Independent Authority Against Corruption (IAAC)	66.4%	80.1%	69%	50%
7	Civil Service Council	66.4%	78.1%	62%	59%
8	National Committee on Gender Equality	64.9%	79.6%	69%	46%
9	National Audit Office	64.0%	78.1%	72%	42%
10	State Great Khural (Parliament of Mongolia)	63.0%	80.1%	65%	44%
<b>Parliamentary organization index</b>		<b>67.5%</b>	<b>79.9%</b>	<b>70.5%</b>	<b>52%</b>
<b>Average index of Mongolia</b>		<b>68.9%</b>	<b>79.5%</b>	<b>74.6%</b>	<b>52.8%</b>

## ANNEX 3. Index results of all organizations

Good | >80 | Satisfactory | 65-79 | Moderate | 50-64 | Unsatisfactory | 35-49 | Poor | <35

Nº	Organizations	2023 index	2024 index	Changes
1	Agency for Land Administration and Management, Geodesy and Cartography	80.5%	82.9%	2.4%
2	Ministry of Road and Transport Development	81%	80.0%	-1.0%
3	Uvurkhangai Province	77.5%	78.9%	1.4%
4	Ministry of Food, Agriculture and Light Industry	77.0%	78.7%	1.7%
5	Ministry of Environment and Tourism	76.3%	77.0%	0.7%
6	Ministry of Finance	75.7%	76.7%	1.0%
7	Khan-Uul District	69.3%	76.4%	7.1%
8	Orkhon Province	74.3%	75.0%	0.7%
9	Bank of Mongolia	74.5%	74.9%	0.4%
10	Ministry of Digital Development and Communications	73.0%	74.7%	1.7%
11	General Department of Taxation	74.3%	74.4%	0.1%
11	Forest Agency	69.7%	74.4%	4.7%
11	Uvs Province	70.7%	74.4%	3.7%
12	Physical Education and Sports Commission	70.0%	74.2%	4.2%
13	Nalaikh District	73.3%	74.0%	0.7%
14	General Authority for the Development of Persons with Disabilities	70.0%	73.4%	3.4%
14	Selenge Province	69.7%	73.4%	3.7%
15	General Office for Labor and Social Welfare Services	73.2%	73.2%	0.0%
16	Agency for Meteorology and Environmental Monitoring	70.0%	73.0%	3.0%
16	Physical Education and Sports Agency	70.0%	73.0%	3.0%
16	Dundgovi Province	69.7%	73.0%	3.3%
17	Ministry of Labor and Social Protection	73.1%	72.9%	-0.2%
17	General Police Department	72.2%	72.9%	0.7%
18	Ministry of Education and Science	68.7%	72.7%	4.0%
18	General Executive Agency of Court Decision	72.7%	72.7%	0.0%
19	Zavkhan Province	71.0%	72.4%	1.4%
20	Ministry of Foreign Affairs	72.7%	72.0%	-0.7%
20	Water Agency	72.3%	72.0%	-0.3%
20	Khentii Province	68.7%	72.0%	3.3%
20	Bayanzurkh District	71.3%	72.0%	0.7%
21	Office of the Governor of Ulaanbaatar City	69.3%	71.7%	2.4%
22	General Authority for Education	67.7%	71.4%	3.7%
23	Ministry of Construction and Urban Development	73.1%	71.0%	-2.1%
23	Arkhangai Province	69.7%	71.0%	1.3%
24	Ministry of Industry and Mineral Resources	63.7%	70.7%	7.0%
25	Financial Regulatory Commission	70.5%	70.5%	0.0%
26	Ministry of Defense	65.7%	70.4%	4.7%
27	Medicines and Medical Devices Regulatory Agency	62.7%	70.0%	7.3%
27	Bulgan Province	67.3%	70.0%	2.7%
27	Ministry of Health	69.3%	70.0%	0.7%
28	Agency for Fair Competition and Consumer Protection	68.3%	69.4%	1.1%
28	General Agency for Forensic Science	68.7%	69.4%	0.7%
28	Ministry of Culture	67.0%	69.4%	2.4%
28	State Special Security Service	72.5%	69.4%	-3.1%

Nº	Organizations	2023 index	2024 index	Changes
29	National Statistics Office	68.5%	69.2%	0.7%
30	State Property Policy and Regulation Agency	68.3%	69.0%	0.7%
30	General Health Insurance Agency	66.7%	69.0%	2.3%
31	General Election Commission	65.3%	68.4%	3.1%
32	National Geological Service	67.2%	68.2%	1.0%
33	Ministry of Economy and Development	66.3%	68.0%	1.7%
34	Cabinet Secretariat of the Government of Mongolia	64.3%	67.4%	3.1%
34	Immigration Agency	62.3%	67.4%	5.1%
34	Ministry of Justice and Internal Affairs	63.7%	67.4%	3.7%
35	Bayankhongor Province	67%	67.0%	0.0%
35	National Human Rights Commission of Mongolia	63.7%	67.0%	3.3%
35	Ministry of Energy	65.3%	67.0%	1.7%
35	Bagakhangai District	62.0%	67.0%	5.0%
36	General Department of Social Insurance	64.3%	66.7%	2.4%
37	Govi-Altai Province	63.0%	66.4%	3.4%
37	Independent Authority Against Corruption (IAAC)	64.0%	66.4%	2.4%
37	Civil Service Council	60.0%	66.4%	6.4%
37	General Authority for Border Protection	58.7%	66.4%	7.7%
38	Darkhan-Uul Province	66.2%	66.2%	0.0%
39	Dornogovi Province	70.0%	66.0%	-4.0%
40	Mineral Resources and Petroleum Authority of Mongolia (MRPAM)	65.8%	65.9%	0.1%
40	Public Procurement Agency	65.2%	65.9%	0.7%
40	Khovd Province	64.2%	65.9%	1.7%
40	National Emergency Management Agency (NEMA)	63.0%	65.9%	2.9%
41	General Authority for State Registration	63.0%	65.7%	2.7%
41	Agency for Standardization and Metrology	64.0%	65.7%	1.7%
42	Bayan-Ulgii Province	65.2%	65.5%	0.3%
42	General Authority for Child and Family Development and Protection	62.0%	65.4%	3.4%
43	Umnugovi Province	63.2%	65.2%	2.0%
44	Dornod Province	63.0%	65.0%	2.0%
44	Govisumber Province	61.7%	65.0%	3.3%
44	Agency for Culture and Arts	61.3%	65.0%	3.7%
44	General Staff of the Armed Forces	62.7%	65.0%	2.3%
45	National Committee on Gender Equality	64.2%	64.9%	0.7%
45	Sukhbaatar District	58.2%	64.9%	6.7%
46	General Authority for Veterinary Services	64.3%	64.7%	0.4%
46	Agency for Small and Medium Enterprises	64.0%	64.7%	0.7%
46	Intellectual Property Office	62.3%	64.7%	2.4%
47	General Intelligence Agency	59.7%	64.4%	4.7%
48	Chingeltei District	60.2%	64.2%	4.0%
49	National Audit Office	63.3%	64.0%	0.7%
49	General Archives Authority	62.3%	64.0%	1.7%
49	E-Government Regulatory Agency	58.7%	64.0%	5.3%
49	Baganuur District	67.7%	64.0%	-3.7%
49	Sukhbaatar Province	55.7%	64.0%	8.3%
50	Civil Aviation Authority of Mongolia	63.2%	63.5%	0.3%
51	Investment and Trade Agency		63.4%	NA
52	Songinokhairkhan District	59.8%	63.2%	3.4%
52	Tov Province	57.5%	63.2%	5.7%

\* Newly established and organizations that were not covered in the previous

Nº	Organizations	2023 index	2024 index	Changes
53	State Great Khural (Parliament of Mongolia)	63.0%	63.0%	0.0%
53	General Customs Authority	59.0%	63.0%	4.0%
54	Khuvsgul Province	58.8%	62.9%	4.1%
55	Bayangol District	59.0%	62.7%	3.7%
56	General Agency for Specialized Inspection (GASI)	57.7%	61.7%	4.0%

\* Newly established and organizations that were not covered in the previous