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EVALUATION REPORT

UDF-KAZ-11-451 / Civil Sector Capacity Building Initiative in Kazakhstan

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All errors and omissions remain the responsibility of the authors.

Disclaimer
The views expressed in this report are those of the evaluators. They do not represent those of UNDEF or of any of the institutions referred to in the report.

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I. Executive Summary

(ii) Project Data
The Civil Sector Capacity Building Initiative in Kazakhstan project sought to improve the quality of nongovernmental organizations (NGOs) services and programs by strengthening their capacity to effectively implement accountability standards with their beneficiaries. Its intended outcomes were: 1) strengthened NGO capacity to implement NGO accountability strategies and tools; 2) strengthened capacity of donor community to foster participatory accountability within the NGO community; and, 3) increased public demand for greater NGO accountability to beneficiaries.

This was a two-year USD 250,000 project (1 February 2013 - 31 May 2015 including a three month no-cost time extension). It was implemented by the Eurasia Foundation of Central Asia (EFCA), a Kazakh NGO based in Almaty. Its main intended activities were to:

- Develop comprehensive guidelines and a handbook for NGO Accountability and train 400 NGO representatives in the guidelines;
- Undertake accountability assessments of 12 NGOs;
- Undertake a survey of donor perceptions towards NGO accountability and hold a donor workshop and conference on NGO accountability; and,
- Develop NGO Accountability Indexes for 2013 and 2014.

(ii) Evaluation Findings
The project objectives were directly relevant to the mission of the EFCA which seeks to strengthen civil society in Kazakhstan and to the state of many NGOs in the country that are driven by funding rather than mission and are not that responsive to the needs of their constituents. EFCA defined this problem as a lack of “downward accountability” and designed this project to address it. This was not the original project proposal that was submitted to UNDEF. The original proposal, intended to create an NGO Expert Center, had already been funded by the time the EFCA received UNDEF’s conditional approval. EFCA then suggested focusing on downward accountability and negotiated this project. The redesign however was not well grounded in the larger concept of accountability, or in how donors incorporate these principles into the efforts they fund. It also did not take into consideration push back received from potential partners and beneficiaries during the design, and did not adequately consult with donors which were included in the design as one of the project’s target groups.

There was limited beneficiary interest in participating in the project found during implementation and EFCA needed to curtail and adapt its planned activities. Only five of the NGOs from the initial training for Accountability Coaches continued to participate in the second training on monitoring and evaluation; a training focused almost exclusively on how to make a better annual report for the NGOs chosen as subgrantees. Only three donors out of 75 contacted responded to the online survey of donor practices. EFCA also narrowed its already limited definition of accountability during implementation to the issuance of an annual report. All of this affected the effectiveness of this project. Outside of the 12 NGOs that received small grants to purchase equipment and materials to produce their 2014 annual report, participants had difficulty remembering the project and its content during the evaluation interviews that took place more than six months after the end of the project. The trainers for the components on annual reporting seemed to be professional and appreciated by the participants. The usefulness of the training for the accountability coaches who were
then intended to train NGOs in the regions appeared to be mixed depending on the level of interest and knowledge of the participants.

EFCA has very efficient systems for the administration of its projects, including financial management. This did not extend to the programmatic management and monitoring for this project. The project started almost six months late reportedly because of the difficulties recruiting the accountability expert who was to lead the technical aspects of the project. This meant that the 2013 accountability index, intended as the project baseline, was not done, and only the 2014 index was done in mid-2014. This limited its usefulness as a measure for NGO development, for project performance or to target project activities. The project also did not use the NGO Expert Center as an implementing partner as indicated in the project document. Instead it recruited and trained its own accountability coaches who each then replicated the training once in their region. Project inputs were consistent with the activities produced, but not with the intended outcomes. This would have required more emphasis and continuity on the programmatic elements of the project and a more process oriented approach towards accountability.

The impact of this project was affected by all of these factors. Accountability was defined in such narrow terms that its results are mainly found at that level, most specifically in the production of the annual report by each of the subgrantees. Anecdotally, results likely included increased visibility of the concept of NGO accountability through the project workshops which the EFCA publicized in the media; increased awareness of accountability as a part of an NGO’s obligation among participating NGOs; and, increased visibility for the 12 subgrantees through the publication of their annual reports. However, no performance data or tracking of the use of project outputs was collected that would allow for an assessment of results beyond this. The project’s monitoring and evaluation (M&E) plan was not fully implemented, and no aggregated data was kept that could have demonstrated the project’s reach to the different regions, types of NGOs or participants.

Sustainability was foreseen to some extent in the design through the publishing and distribution of the Accountability Guidelines and Handbook, and through the use of the NGO Expert Center and its regional network. However, the Center was not used beyond posting of the project materials on its website. The lack of NGO continuity in the different project activities also limited its chances for sustainable outcomes. The increased knowledge gained by some in the preparation of reports is likely to last within those individuals. There was UNDEF-value added for this project as it seems unlikely that the EFCA would have developed this project without the availability of the UNDEF funding.

(iii) Conclusions

- The concept of accountability is important and needed in the context where many NGOs seek government funding to provide services. There is a need to ensure these NGOs are linked to their beneficiaries and for all NGOs to realize they need to be as accountable as they are asking the government to be. At the same time, the focus on accountability as primarily a product instead of a process limited its relevance and effectiveness.

- The project had limited ownership among participants and, except for the term ‘downward accountability,’ for the grantee as well. The project appeared to have been driven by the availability of funds and its activities. It did not appear that EFCA had made this project a priority with limited interest by participants.
The project could have been more effective if implemented in a more programmatic manner and used a development focus. Most of the activities were one off efforts, done in a short period of time with different NGOs with little to no follow up. This limited the ability of the project to make a more substantial difference in the level of NGO accountability to its beneficiaries.

The project could have had more significant results than were visible to the evaluation team, but it is not possible to know as results beyond outputs were not tracked. The M&E plan was inadequate to show project results beyond outputs even if it had been followed.

(iv) Recommendations

- For similar projects in the future, the evaluators recommend continued focus on accountability in NGO strengthening projects and especially as a part of the larger process of accountability that include clarifying the NGOs vision and mission, developing its consultative structures and processes, and adopting integrity standards and regular public reporting processes.

- Better grounding of projects in the larger development context to ensure that it builds on existing efforts, has a good understanding of how its intended beneficiaries operate, targets NGOs that lack accountability, and tests its theory of change as part of its design processes.

- Maintain focus on the project’s higher level intended outcomes during implementation and ensure that all activities maintain a programmatic focus and contribute directly to the intended outcomes. Ensure enough depth for project activities and follow-ups, and avoid the one-off efforts which are rarely effective.

- Ensure agreements with implementing partners named in project designs are formalized in writing as part of the proposal writing process to ensure that intended implementing partners are aware of the design and agree to their part of project delivery.

- Ensure M&E plans incorporate adequate outcome indicators and measurements in future projects to be able to track project progress and results as well as its outputs. Do baselines at the very start of a project and repeat them at the end. Short pre- and post-knowledge, attitudes and practices tests should be administered for trainings. Data should be aggregated as part of the regular project management, monitoring and reporting processes as well as disaggregated by different variables to be able to understand project reach and performance.

- Donors should consider reallocating funds to other short-listed proposals if their original selection ends up funded before the award process is completed. This could avoid generating ad hoc or significantly reworked proposals that might not be as pertinent as the original concept.
II. Introduction and development context

(i) The project and evaluation objectives

_Civil Sector Capacity Building Initiative in Kazakhstan project_ (UDF-KAZ-11-451) was a two-year USD 250,000 project implemented by the Eurasia Foundation of Central Asia (EFCA). USD 25,000 of this was retained by UNDEF for monitoring and evaluation purposes. The project ran from 1 February 2013 to 31 May 2015 including a three-month no-cost time extension. Its main objective was to improve the quality of Non Governmental Organization (NGO) services and programs in Kazakhstan by strengthening the capacity of NGOs to effectively implement accountability and tools which included beneficiaries. It intended to do this through: 1) strengthening NGO accountability tools and NGO capacity to use those tools; 2) strengthening the capacity of the donors to foster accountability within the NGO community; and 3) increasing public demand for increased accountability.

The evaluation of this project is part of the larger evaluation of the Rounds 2, 3 and 4 UNDEF-funded projects. Its purpose is to "contribute towards a better understanding of what constitutes a successful project which will in turn help UNDEF to develop future project strategies. Evaluations are also to assist stakeholders to determine whether projects have been implemented in accordance with the project document and whether anticipated project outputs have been achieved".

(ii) Evaluation methodology

The evaluation took place in January 2016 with field work done in Kazakhstan from January 25-29 2016. The evaluation was conducted by Sue Nelson and Larissa Stepantsova, experts in democratic governance. The UNDEF evaluations are more qualitative in nature and follow a standard set of evaluation questions that focus on the project’s relevance, effectiveness, efficiency, impact, sustainability and any value added from UNDEF-funding (Annex 1). This report follows that structure. The evaluators also reviewed available documentation on the project and on the NGO sector in Kazakhstan (Annex 2).

In Almaty, the team met with EFCA, the NGO Expert Center, project trainer-of-trainers (TOT), and NGO participants. In addition, the team went to Esik to talk to project sub-grantees and to the capital, Astana, to speak with donors, NGO participants, the baseline survey implementer and the project’s accountability expert. The list of persons interviewed in provided in Annex 3.

During the preparatory work, the evaluators identified several issues which they followed up on during their interviews. These included:

- **Project design** since the 2014 survey did not appear to support the basic assumptions underlying the project design;
- **Extent of results** beyond outputs as the project’s monitoring and evaluation (M&E) plan required annual surveys which were not conducted;
- **Use of the project’s on-line resources** to assess the extent they were used and their value for users; and,
- **Disaggregation of NGO participants** as no disaggregated reporting was provided in the project reporting to show location/type of NGOs or persons that participated.

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1 Operational Manual for the UNDEF-funded project evaluations, p. 6.
In addition, the team assessed the issues raised by UNDEF:

- **Extent of positive impact on NGOs** since the Final Narrative Report commented that some NGOs felt transparency had potentially negative impacts from people trying to interfere with their work;
- **Extent of changes in perception** on promoting NGO accountability throughout the project; and,
- **Sustainability** of the project and its activities.

(iii) Development context

Kazakhstan has a large civil society sector with more than 32,000 NGOs registered in 2014. The expansion of NGOs started after independence with more than 900 NGOs being created in the 1990s, mostly focused on rights protection. With international support the number of NGOs diversified and institutionalized. Since 2001 there has been greater recognition of NGOs from the government and public financing mechanisms for NGOs. The government also provided capacity building for NGOs within the framework of social state contracting (contracts from government to provide service to the people) although this was recently ended.

An in depth 2008 - 2010 Civicus study of civil society found it moderately developed and operated within a well-developed framework of infrastructure and resources. However, it was driven by, and dependent on, international donor funding and state social procurements. Most donors only fund programmatic elements, and although NGOs are able to earn funds from the sale of goods, this is insufficient for many. Civicus found the sector’s biggest challenge was its lack of sustainable human resources and financial sustainability, and the greatest threat to its legitimacy as the lack of accountability and transparency in their use of public funds.

Most CSOs are new and inexperienced, created to take advantage of the availability of state procurements. That process does not have significant organizational requirements for subcontractors or for the recipients of funds. As a result most NGOs have weak internal structures and usually only do the legally required procedures, such as organizational charters that are needed for registration and contracts for paid staff and subcontractors. Many use service contracts rather than hiring staff as employees to avoid the requirements of being an employer. Many lack strategic planning and work from project to project.

Rural NGOs have more limited access to training, internet and networking platforms. However experienced CSOs have clear mission statements, established procedures, strategic plans and practice CSO governance. But Civicus noted that even these lack transparency and information about their activities and incomes in order to avoid attention of local authorities and tax inspectors. The study also found little public knowledge and recognition of NGOs, due in part between the limited cooperation between NGOs and the media.

According to the 2014 Accountability Index commissioned by the project only a quarter of the NGOs could answer the question of “what is NGO accountability to beneficiaries,” with 40 percent leaving the question unanswered. However three-quarters of the NGOs said they

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2 Civicus, Civil Society Index in Kazakhstan 2008 - 2010, p 104
3 Ibid
4 Civicus, Op Cit, p 106
involved their beneficiaries in project implementation and project development but only 38 percent of the NGO beneficiaries surveyed said they participated in this. However, 80 percent of NGO beneficiaries say they do receive information about NGO activities (Figure 1).

Almost 40 percent of NGOs thought information should be provided to their beneficiaries on a continuous basis; with 16 percent thinking it should be done quarterly, 18 percent annually and the remained twice a year. Only 37 percent of respondents thought financial information should be reported to beneficiaries. The survey also noted that 61 percent of respondents felt that the biggest advantage of accountability was greater awareness of the organization and its social impact on the community with more than half linking accountability to increased trust by the community through publicizing the relevance of their work. They also noted that reports provide a tool for beneficiary feedback and a good tool for fundraising.  

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5 EFCA, Guidebook on NGO Accountability to Beneficiaries, p 35
6 EFCA, Op Cit, pps 36, 37 and 39
III. Project strategy

(i) Project approach and strategy

With this project, the Eurasia Foundation of Central Asia intended to assist NGOs to become more responsive to the needs of their beneficiaries by strengthening their accountability mechanisms to their beneficiaries. It felt that addressing the lack of downward accountability would strengthen the quality of NGO services and NGO usefulness for their stakeholders. In particular, EFCA intended this project to address the:

- **Weak impact of NGO efforts** on the communities and beneficiaries they intended to serve and the limited levels of civic engagement in Kazakhstan;

- **Lack of institutional capacity of NGOs** to survey the needs of their beneficiaries, develop programmatic priorities and provide effective, sustainable projects and services;

- **Continuing NGO dependency on donors** and the lack of funding diversity that makes them donor-driven rather than needs-driven, and their lack of transparency and consultations in the allocation of their budgets and development planning; and,

- **Lack of organizational commitment by NGOs** to frame intervention activities in terms of local needs because of a lack of communications with beneficiaries, low monitoring and evaluation capacity and weak self-regulation.

EFCA expected to address these problem areas by developing accountability tools and mechanisms for NGO use with their beneficiaries in order to engage them in their planning and programming activities. It would then familiarize donors with the concept of participatory accountability and bottom-up accountability tools.

In particular, the UNDEF project intended to:

- **Create sector standards** through the development of NGO Accountability Guidelines developed in partnership with the NGOs for their voluntary use with their beneficiaries. These were expected to create the starting point to develop coordinated efforts that would lead to more accountability for their beneficiaries;

- **Provide regional training** on the Guidelines through accountability coaches identified and trained through the project in all 14 regions in Kazakhstan;

- **Foster public awareness** through developing Accountability Indexes for 2013 and 2014 to bring public attention to the NGO Accountability Guidelines and to also serve as public monitoring tools of local NGOs;

- **Support Guideline implementation** into the daily practice of NGOs through a team of trained Accountability Coaches, dissemination of dual-language online and print resources, and the provision of small grants and monitoring and evaluation trainings to select NGOs to support institutional and programmatic changes; and,

- **Stakeholder participation** by including donor community into the larger conversation about NGO accountability, through educating donors about the Guidelines, exploring ways donors could encourage their NGO partners to demonstrate greater communications with beneficiaries, and through a final conference that would provide
a national-level platform for NGOs, donors and the wider beneficiary community to engage in dialogue regarding NGO accountability.

The intended outcomes for this project were: (i) strengthened NGO capacity to implement NGO accountability strategies and tools; (ii) strengthened capacity of donor community to foster participatory accountability within the NGO community; and, (iii) increased public demand for greater NGO accountability to beneficiaries.

There were a number of assumptions underlying the project strategy. The primary assumptions were that the main problems facing NGO accountability were the lack of NGO capacity to report on its activities or communicate with its beneficiaries; that “upward accountability” did not also translate to “downward” accountability depending on donor conditions; that donors would be interested in participating in this effort and did not already have appropriate accountability tools for use by their grantees; that NGOs lacked vision and mission standards that incorporated their beneficiaries’ interests; and that NGOs had the interest and will to implement project-developed standards and tools.

EFCA also identified some risks for the project. Among these were that the NGOs lacked interest in changing because of perceptions that accountability meant more rules and procedures; a lack of donor/beneficiary demand for accountability; limited NGO human and material resources to implement accountability standards; perceptions that NGO accountability guidelines would not be relevant to civil society stakeholders; and, the lack of media and public interest in issue of NGO accountability. The project intended to mitigate these risks by having the NGO Guidelines developed by representatives of the NGO sector to ensure they were rooted in actual experience; demonstrating that application of the voluntary standards would lead to more positive attention for NGOs from potential donors; that donors would become engaged by providing themes for workshops and by pointing out in workshops the potential commercial and economic benefits of NGO accountability to their beneficiaries; engage media by providing regular project updates; and, by inviting the press to activities and events.

Sustainability of the effort was to be ensured through developing a “sustained dialogue” between the civil society stakeholders that would continue after the end of the project. It also intended to disseminate practical accountability skills and resources through the texts and Guidelines and training of the NGOs to conduct their own internal assessments, liaise with community members and develop and implement their own long term activity action plans. It also expected the NGO Accountability Index to become an annual practice done by the NGO Center for Expertise. It also expected to create networks through trainings and presentations that would outlive the project.

Gender was to be integrated into the programme through the recognition that the majority of rural NGO leaders are female and face unique challenges in organizational and community leadership. Preference was to be given to applicants providing services to vulnerable and impoverished populations in rural areas, including women, youth, the elderly, special needs and ethnic Kazakhs repatriates. The Accountability Handbooks was expected to include a section on how to encourage greater participation from women and other vulnerable groups in the design, implementation and evaluation of programs and services.
## (ii) Logical framework

### Project activities

<table>
<thead>
<tr>
<th>Intended outcomes</th>
<th>Medium-term impacts</th>
<th>Long-term development objective</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strengthened NGO capacity to implement accountability strategies and tools</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 1 two-day stakeholder summit to develop accountability definitions (28 persons)</td>
<td>NGOs adopt and implement accountability guidelines and take more responsibility for their actions on their communities</td>
<td>More inclusive planning processes and beneficiary friendly project management</td>
</tr>
<tr>
<td>• NGO Accountability Guidelines developed</td>
<td>NGOs have better understanding on use of accountability tools and strategies</td>
<td>More sustainable and effective programmes</td>
</tr>
<tr>
<td>• 1,000 copies Guidelines published, distributed in Kazakh and Russian</td>
<td>NGOs more actively engaged with beneficiaries</td>
<td>More accountable and transparent NGO operations and programmes</td>
</tr>
<tr>
<td>• 1 3-day TOT course for 15 NGO trainers as Accountability Coaches</td>
<td>Stronger self-regulation of NGOs</td>
<td>Improved quality NGO services and programs</td>
</tr>
<tr>
<td>• 15 Coaches provide 3 day accountability trainings (430 persons)</td>
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</tr>
<tr>
<td>• 12 NGOs assessed for accountability and given USD 1,500 grant to implement action plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 15 NGO leaders trained on M&amp;E (from 12 NGOs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 1 Accountability Handbook created, 1,000 copies distributed</td>
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</tbody>
</table>

**Strengthened capacity of donor community to foster participatory accountability within the NGO community**

| Perception survey of 75 donors | Increased donor understanding of and commitment for downward accountability | More effective and sustainable use of funds by NGO grantees | Improved quality NGO services and programs |
| Workshop for 20 donor representatives | Increased donor requirements for downward accountability | | |
| Accountability conference (75 persons) | | | |

**Increased public demand for increased accountability from NGO community**

| 2013 and 2014 NGO Accountability Indexes | Increased information on NGO accountability issues and current status | Increased public awareness on NGO accountability issues | Improved quality NGO services and programs |
| Presentation workshop for 2013 Index and Guidelines (50 persons) | | | |
| Press conference (20 media reps) | Increased beneficiary demand for better NGO services and accountability | | |
| Accountability conference (75 person) | | | |
IV. Evaluation findings

(ii) Relevance
The project objectives were directly relevant to the mission of the EFCA which seeks to strengthen communities in Kazakhstan by building the institutional capacity of partner institutions through training, consulting and resource mobilization training. It was also relevant to the state of many NGOs in the country that are driven by their search for funding rather than by their mission or the needs of their constituents.

Although this problem has many causes and effects, EFCA defined it as a lack of “downward accountability” and designed this project to address this issue. This was not the original project proposal submitted to UNDEF. The original proposal was intended to create an NGO Expert Center that could help with NGO development. However that proposal was already funded by the time EFCA received UNDEF’s conditional approval. EFCA then proposed focusing on ‘downward accountability’ as a means to strengthen NGOs and negotiated this design in order to maintain the funding.

The redesign however was not well grounded in the larger concept of accountability which sees it as a process that is integrated into the way an organization functions rather than as an output such as a report. It also did not understand the way most donors address the issues of accountability and how they incorporate these principles into the efforts they fund. EFCA received push back on its concept from its potential partners and beneficiaries during its design phase, but did not seem to have adapted its design to increase their interest. The end result was a project without continuity of participants as they seemed to change for almost every activity, and the curtailing, adapting or abandoning of some of the key activities during implementation. Participation and interest of donors, who were integrated into the design, was negligible.

(ii) Effectiveness
The project had a slow start, reportedly caused by the difficulties in identifying a suitable accountability expert who could provide the technical guidance for the project. It also implemented the activities intermittently (Figure 2), curtailed some, such as the Accountability Index, and continued to narrow its definition of accountability throughout the project. All of this affected effectiveness of the project.

The first main activity, the stakeholder summit to define accountability and develop the accountability guidelines, was not held until August 2013. It was intended to be a two-day conference, but was reduced to one day to ensure enough NGO participation. By then, the accountability expert had already developed the draft guidelines which gave the participants something to work from and the finalized guidelines were published in November 2013. Website statistics were not kept during the project but a check by EFCA during the evaluation showed that the accountability documents put on the NGO Expert Center received 71 views.
The training of the ‘accountability coaches’ through a training of trainers’ (TOT) effort was done in early November 2013. According to the Project Document, this training was intended to be done by the NGO Expert Center for the regional members of its NGO network. They would then work in their regions as the coaches/trainers for the duration of the project. Instead, however the project used its accountability expert to provide the training and directly recruit its 15 participants. Those participants were then expected to replicate the training in their region. This was a one-time effort for most of them, which negated one of the main programmatic elements of the design, as well as one of the main sustainability elements.

EFCA recruited the trainers/coaches through announcements in the NGO networks and by directly contacting persons and asking them to apply to ensure they had enough participants to cover the regions. There were four regions where no one applied and these areas were covered by the other trainers.

The effectiveness and subsequent use of this training is uncertain. The accountability expert developed a short manual for TOT reference and the three day course covered the organization of trainings as well as the substance of accountability, defined primarily as transparency through reporting. Some of the participants felt they were already well versed on the issue while others thought the training needed to be more participatory. Only a few of those interviewed expressed a genuine interest in the topic. It is unclear how many of these trainers/coaches went on to do trainings in the regions and how many persons they reached. No aggregation of the information was done to demonstrate its actual reach or usefulness to participants.

Only five of the persons who attended the TOT training continued to participate in the project and attended the “Monitoring and Evaluation” training done in November 2014. The M&E participants were selected through a competitive process where the recipients received training and a grant of USD 2,861 to develop their annual report. This amount was almost doubled that planned in the Project Document, with the increase covered by the savings made from the curtailed activities. The 12 subgrantees used their funding to purchase cameras, laptops and to pay for report materials, including translations.

![Trainer-of-Trainer Training, Photo: EFCA](image)

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### Table: Main project activities

<table>
<thead>
<tr>
<th>Main project activities</th>
<th>Date</th>
<th>No. Participant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project start date</td>
<td>1 Feb 2013</td>
<td>31</td>
</tr>
<tr>
<td>Guidelines workshop</td>
<td>15 Aug 2013</td>
<td>1,000 copies</td>
</tr>
<tr>
<td>TOT training</td>
<td>4-6 Nov 2013</td>
<td>18</td>
</tr>
<tr>
<td>Guidelines published</td>
<td>16 Nov 2013</td>
<td>1,000 copies</td>
</tr>
<tr>
<td>TOTs do training</td>
<td>Mar - April 2014</td>
<td>430</td>
</tr>
<tr>
<td>Accountability Index</td>
<td>25 July 2014</td>
<td>-</td>
</tr>
<tr>
<td>M&amp;E training</td>
<td>6-8 Nov 2014</td>
<td>15</td>
</tr>
<tr>
<td>Donor survey</td>
<td>15 Nov 2014</td>
<td>3</td>
</tr>
<tr>
<td>Donor conference</td>
<td>4 Dec 2014</td>
<td>12</td>
</tr>
<tr>
<td>Final conference</td>
<td>19 Dec 2014</td>
<td>75</td>
</tr>
<tr>
<td>Subgrantee reports</td>
<td>Jan 2015</td>
<td>12</td>
</tr>
<tr>
<td>Accountability Handbook published</td>
<td>July 2015</td>
<td>1,000 copies</td>
</tr>
<tr>
<td>End of project</td>
<td>31 May 2015</td>
<td></td>
</tr>
</tbody>
</table>
The three day M&E training covered two main areas, the first part done by experts on monitoring and indicators, and the second part on the report layout done by media experts. Almost all of the training focused on the production of a better annual report through the use of indicators to demonstrate performance and graphics to increase its visual interest to readers. There was follow up provided by these trainers who subsequently reviewed the subgrantees’ indicators and layouts for the reports. The M&E trainers seemed competent and professional. They felt more time was needed to cover their topics, especially the M&E portion, which affected the training’s effectiveness. They also raised the issue of the selection criteria for the participants, feeling that some of the participants were not interested in the workshops or that they had sent a director instead of the person who would actually be doing the report.

The Accountability Index was not done as planned in 2013, reportedly because the accountability expert was recruited late. The Index for 2014 was contracted to a research focused NGO, Sange. It appears to have been a professional effort by an organization with a good understanding of NGOs and accountability issues and the report provided some interesting findings. However, the usefulness of the Index was limited beyond providing a snapshot of NGOs in Kazakhstan, as it was not done at the start of the project to assist it with its targeting or programming and did not include a sample of project participants so it had limited relevance in terms of a project baseline or for measuring project results.

Donor participation in the project was minimal. Only three donors out of 75 responded to the project’s online survey of donor practices. The survey itself was not geared towards institutional donors, and asked questions more pertinent to individual donations; such as if they contributed last year, intended to donate next year, etc. With such a small response, the survey results were not useful.

(iii) Efficiency
EFCA is an experienced grant making organization and has efficient systems in place for the administration of its projects, including their financial management. This did not extend in this
case however to the programmatic management and monitoring of the project. The project started late, worked in fits and starts and required a four month no-cost time extension to complete. Implementation seemed dependent on the recruitment of an accountability expert. Identification of this person was not started until EFCA had the UNDEF funds in hand. This delayed the holding on the stakeholder summit that was to develop the accountability guidelines and eliminated the 2013 Index which was to serve as the project’s baseline.

The NGO Expert Center, identified in the Project Document as an implementing partner, was not used in the project other than for the project products to be posted on its website. Had it been used, and assuming it had the capacity indicated in the Project Document, it could have made the project less dependent on the accountability expert for implementation and allowed for the project to undertake multiple activities at the same time, rather than consecutively depending on the availability of time of the expert. However, the Center's Director, who is mentioned as the contact person in the Project Document, appeared not to have been aware of, or be able to remember, the Center's intended role in this project.

EFCA was easily able to provide detailed expenditure data for the project to the evaluation team. It also appeared to have provided in-kind resources for the implementation of the project which were not tracked or quantified. This included the time for the financial staff, press officer and executive director.

**Figure 3: Project Expenditures**

![Chart showing project expenditures](image)

Project inputs were consistent with the activities undertaken but not with the anticipated outcomes. Those would have required much more emphasis and continuity on the programmatic elements of the project and a more process oriented approach to the concept of accountability. Two thirds of the project funding went for the sub-grantee component and their production of their 2014 annual reports and the project management and related EFCA costs. This was higher for the grantee component due in large part to the almost doubling of their grants with UNDEF’s approval. Only one percent of the project funding was used for the donor components with UNDEF’s approval which is consistent with the lack of results found for this element.

The only full-time staff person funded under the project was the project manager. She was new to project management and also appeared to have other responsibilities. The project also funded a part-time grants manager for administrative issues. There were no funds planned for the implementing partner, NGO Expert Center. This was inconsistent with the program design that incorporated the Center as an implementing partner, responsible for the
TOT and the cascade trainings. The Center was not part of this project in actual implementation other than having project related items and products posted on its website. The reason for including the Center in the project document and then not using it was not clear to the evaluators.

Reporting to UNDEF was timely but the reports were general in nature and lacked the disaggregated data needed to be able to understand the actual reach of the project and its results. Basic programme management and monitoring systems did not appear to have been in place other than ensuring the project related documents were kept and the required reports were sent to UNDEF.

(iv) **Impact**

Impact of the project was affected by its design and implementation as discussed in the previous sections. In addition, accountability was defined in such narrow terms, and ultimately down to the production of a report, which is where project’s results are the most visible.

No performance data was collected that would allow for an assessment of impact. However, from the anecdotal information gathered during the evaluation, it appears likely that this project:

- **Increased the visibility of the issue of NGO accountability** through the project workshops which EFCA publicized through the press, and by the distribution of the project products, such as the Accountability Guidelines and Accountability Handbook. This was done not only in Almaty and in the capital Astana, but for the NGOs that participated in the regions through the regional trainings.

- **Ensured publication of a 2014 annual report for subgrantees** that had never done a public annual report before, and likely **improved the content and presentation for subgrantees** that had previously produced annual reports. It is difficult to make the leap from publication of the reports to increased accountability by the subgrantees, but for some it was a step towards increased transparency as the reports included some general information on the NGO’s financial receipts and

  “Accountability is not new. We did narrative reports before but we only produced them for donors. We realized they were boring– it was just text. We would discuss it with our beneficiaries before- in short meetings to explain what we were doing. This is not needed now as it is all in the report. At the moment, we have had a negative response from donors-- when they see how much funding we received, they felt we had enough money so did not fund us. The donors didn’t care that it was money for projects. We only got one small project this year. Nevertheless, we were really happy with the accountability project- it was really useful, especially the part on infographics. We still use the camera.”

  **NGO Sub-Grantee**
Some reports did serve to increase the visibility of the subgrantees programs, with a few noting that they had received positive responses from donors and in some cases from local government.

- **Increased awareness of accountability as part of an NGO’s obligation** among some NGOs who might not have realized the extent of the concept previously through the various workshops and products. The extent of this is unknown since no pre or post project data was collected on participants. Most participants said they were aware of the concept of accountability before but had not thought about how they applied it to their work. For some, it expanded the concept beyond reporting for donors to reporting for the broader public. It is unknown if any NGOs changed their behavior or practices afterwards to be more accountable.

- **Increased visibility for the 12 subgrantees** through the printing and distribution of their annual reports which highlighted their activities and provided some success stories. The translation of the 2014 reports into English was also helpful for some beneficiaries as it allowed them to reach a broader pool of potential donors.

Determining impact beyond these elements is not possible without data. No performance monitoring was done other than the handing out a ratings sheet at the end of a workshop and that information was not aggregated to get a percentage of those satisfied or not satisfied with the event. It was not apparent if the project had checked the use of its products posted on the websites to see if they were being accessed as resources by the NGOs in Kazakhstan or elsewhere. Performance data needs to be collected during project implementation and routinely analyzed to ensure that the project is on track, is reaching its intended beneficiaries and is making progress towards the intended project outcomes.

The M&E plan in the project document might have provided a good part of this information had it been fully implemented. However, only bits and pieces were done. For instance, the 2013 Accountability Index was not done. This was intended to be the baseline for the project. Only one Index was done in mid-2014. To be useful a baseline needs to be done at the very start of a project and again at the end to see if there are any changes. It also requires that the baseline includes a good sample of project participants to be able to attribute changes to the project— which did not appear to be the case for the Index.

The project did undertake an institutional assessment of the 12 applicants for the subgrants. This could serve as a baseline for the assistance provided to these 12 NGOs. But this activity was done at the end of the project.
project so was also not repeated afterwards to see what systems and practices had changed as a result of the assistance. EFCA also did not track which of these NGOs had already been doing annual reports or determine if their project-assisted reports met better reporting standards than their pre-assisted reports. Had this activity, which used more than 30 percent of project funding, started at the beginning of the grant, the project could have continued to work with these 12 sub-grantees over the life of the project. This would have made the assistance more effective and sustainable as it would have worked with these NGOs on accountability issues through two annual reporting cycles, rather helping them report at the end of one.

**(v) Sustainability**

The project included some sustainability elements in its design, most notably through the publishing and distribution of the Accountability Guidelines and the Accountability Handbook, and through the use of the NGO Expert Center. The Center was supposed to have done the trainer-of-trainer training with the Accountability Coaches recruited from its regional network. As residents in the different regions, they could then provide the programmatic continuity and sustainability for the project in each region. However, as previously noted, this model was not used during implementation and instead the trainings in each region became one-off events. The continual change of NGOs participating throughout the project meant that most NGOs participated only once or twice in a project activity which also limited the chances for sustainable outcomes.

The increased knowledge gained by some participants through participation in the project is likely to remain within those individuals. This is most likely found with those that attended the M&E training and that worked with the project on their annual reports. The remainder of participants interviewed had difficulty remembering their participation in the workshops and conferences, except for a few individual NGO activists who were well versed on and interested in the topic.

The equipment purchased by the project is still with the 12 subgrantees which they are using for their NGO work. This includes cameras and laptops for some. Most of these subgrantees recognized the advantages of doing an annual report, but not all were certain that they would produce a report for 2015. Most of their constraints to continued reporting appeared to be financial.

**(vi) UNDEF Value added**

It is unlikely there would have been a downward accountability project without the UNDEF funding. The grantee had not foreseen doing such a project and the conditional approval by UNDEF for the earlier proposal allowed the EFCA to develop the idea of focusing a project on the issue of downward accountability as a part of NGO strengthening.
IV. Conclusions

Based on the evaluation findings, the team concludes:

(i) The concept of accountability is important and needed in the context where the government funds many NGOs to provide services. There is a need to ensure these NGOs are connected to their beneficiaries and for all NGOs to realize that they should be as accountable as they expect the government to be. At the same time, the project's focus on accountability as primarily a product instead of a process limited its relevance and effectiveness. This conclusion follows the findings on relevance, effectiveness, efficiency, sustainability and impact.

(ii) The project had limited ownership among participants and, except for the term 'downward accountability,' for the grantee as well. The project seemed driven by the availability of funds and its individual activities. It did not appear that EFCA had made this project a priority and the lack of interest by most beneficiaries was evident during its design as well as in implementation. This conclusion follows the findings on relevance, effectiveness, impact and sustainability.

(iii) The project could have been more effective if implemented in a more programmatic manner. The project lacked a development perspective and used mostly using one-off activities, done in a short period of time with different NGOs with little to no follow up. Beyond general awareness raising, this is not an effective strategy for a development project or for sustainable outcomes. This conclusion follows the findings on effectiveness, impact and sustainability.

(iv) The project could have had more significant results than were visible to the evaluation team, but it is not possible to know as results beyond outputs were not tracked. The M&E plan was inadequate to show project results beyond outputs even if it had been followed. The M&E plan had several serious design flaws, such as the one-time NGO subgrantee assessments, not targeting project participants for the Indexes and in the timing for its activities. This conclusion follows the findings for relevance, effectiveness, efficiency, impact and sustainability.
V. Recommendations

To strengthen similar projects in the future, the team recommends:

(i) **Continued focus on accountability in NGO strengthening projects, and especially as a part of the larger process of accountability** that includes clarifying the NGO’s vision and mission, developing its consultative structures and processes, and adopting integrity standards and regular public reporting processes. This recommendation follows conclusions (i), (ii) and (iii).

(ii) **Better grounding of projects in the larger development context** to ensure it builds on existing efforts, has a good understanding of how its intended beneficiaries operate, targets NGOs that lack accountability, and tests its theory of change as part of its design process. It also needs to be sure it understands the operations and requirements of other intended participants such as donors. This recommendation follows conclusions (ii) and (iii).

(iii) **Maintain focus on the project’s higher level intended outcomes during implementation** and ensure that all activities maintain a programmatic focus and contribute directly to the intended outcomes. Ensure enough depth for project activities and follow-ups, and avoid the one-off efforts which are rarely effective. This recommendation follows conclusions (i), (ii), (iii) and (iv).

(iv) **Ensure agreements with implementing partners named in project designs are formalized in writing** as part of the proposal writing process to ensure that every intended implementing partner is aware of the design and agree to their part of project delivery. This allows them to bring their contribution to the design and helps to ensure they are able to deliver their part of the project within the amounts allocated to them in the proposal budget. This recommendation follows conclusions (ii) and (iii).

(v) **Ensure M&E plans incorporate adequate outcome indicators and measurements** in future projects to be able to track project progress and results as well as its outputs. Do baselines at the very start of a project and repeat them at the end. Short pre- and post-knowledge, attitudes and practices tests should be administered for trainings. Data should be aggregated as part of the regular project management, monitoring and reporting processes as well as disaggregated by different variables to be able to understand who has been reached, what is working, and where corrective measures are needed to increase project effectiveness during project implementation. This recommendation follows conclusions (ii), (iii), and (iv).

(vi) **Donors should consider reallocating funds** to other short-listed proposals if the original proposal ends up funded before the award process is completed. This could help avoid generating ad hoc or significantly reworked proposals that might not be as pertinent as the original concept. This recommendation follows conclusions (i), (ii) and (iii).
VI. Overall assessment and closing thoughts

The objectives of the project were likely needed by many NGOs in Kazakhstan, but the design and implementation needed more thought and grounding within the larger development and accountability context. The idea of NGO accountability has been incorporated into international donor funding for NGOs in Kazakhstan since the 1990s and more recently in large scale civil society capacity building programmes. These may not have used the term ‘downward accountability’ but they covered the idea and trained a sizeable number of NGOs. These NGOs could have been good partners for EFCA in the design and implementation of the project. Building on and leveraging these earlier and continuing efforts could have made the project much more effective than conceptualizing a project in isolation of the rest.

The NGO context is getting more difficult for NGOs in Kazakhstan. The new NGO law adopted in December 2015 was of major concern for most of the NGOs interviewed. This law has data reporting requirements that they fear will lead to increased state control over civil society operations and to the closing down of independent civil society. Projects that lead to increased NGO transparency and accountability can help eliminate misconceptions about NGO funding and intentions, making it more difficult for arbitrary action to be taken against them.
### Annex 1: Evaluation questions:

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<tr>
<th>DAC criterion</th>
<th>Evaluation Question</th>
<th>Related sub-questions</th>
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| Relevance     | To what extent was the project, as designed and implemented, suited to context and needs at the beneficiary, local, and national levels? | - Were the objectives of the project in line with the needs and priorities for democratic development, given the context?  
- Should another project strategy have been preferred rather than the one implemented to better reflect those needs, priorities, and context? Why?  
- Were risks appropriately identified by the projects? How appropriate are/were the strategies developed to deal with identified risks? Was the project overly risk-averse? |
| Effectiveness | To what extent was the project, as implemented, able to achieve objectives and goals? | - To what extent have the project’s objectives been reached?  
- To what extent was the project implemented as envisaged by the project document? If not, why not?  
- Were the project activities adequate to make progress towards the project objectives?  
- What has the project achieved? Where it failed to meet the outputs identified in the project document, why was this? |
| Efficiency    | To what extent was there a reasonable relationship between resources expended and project impacts? | - Was there a reasonable relationship between project inputs and project outputs?  
- Did institutional arrangements promote cost-effectiveness and accountability?  
- Was the budget designed, and then implemented, in a way that enabled the project to meet its objectives? |
| Impact        | To what extent has the project put in place processes and procedures supporting the role of civil society in contributing to democratization, or to direct promotion of democracy? | - To what extent has/have the realization of the project objective(s) and project outcomes had an impact on the specific problem the project aimed to address?  
- Have the targeted beneficiaries experienced tangible impacts? Which were positive; which were negative?  
- To what extent has the project caused changes and effects, positive and negative, foreseen and unforeseen, on democratization?  
- Is the project likely to have a catalytic effect? How? Why? Examples? |
| Sustainability| To what extent has the project, as designed and implemented, created what is likely to be a continuing impetus towards democratic development? | - To what extent has the project established processes and systems that are likely to support continued impact?  
- Are the involved parties willing and able to continue the project activities on their own (where applicable)? |
| UNDEF value added | To what extent was UNDEF able to take advantage of its unique position and comparative advantage to achieve results that could not have been achieved had support come from other donors? | - What was UNDEF able to accomplish, through the project, that could not as well have been achieved by alternative projects, other donors, or other stakeholders (Government, NGOs, etc).  
- Did project design and implementing modalities exploit UNDEF’s comparative advantage in the form of an explicit mandate to focus on democratization issues? |
Annex 2: Documents Reviewed:

Almaty Management University, Website, http://www.almau.edu.kz/

Association for the Conservation of Biodiversity of Kazakhstan, Website, http://www.acbk.kz/


Eurasia Foundation of Central Asia, Facebook, [https://www.facebook.com/efcentralasia/info/?tab=page_info](https://www.facebook.com/efcentralasia/info/?tab=page_info)

Eurasia Foundation of Central Asia, *Guidebook on NGO Accountability to Beneficiaries*, Almaty, 2015

Eurasia Foundation of Central Asia, Website, [http://www.efca.kg](http://www.efca.kg)

Foundation of Local Communities of Enbekshikazakhstani Rayon, Website, [http://fmsenkaz.kz/](http://fmsenkaz.kz/)


Public Fund “Association of Mediators of Kostanay Oblast”, Website, [http://amko.kz/](http://amko.kz/)


Public Fund “Soyuz Krizisnykh Centrov”, Website, [http://telefon150.kz/](http://telefon150.kz/)

Research and Consulting Center “KAMEDA”, Website, [http://kameda.kz/](http://kameda.kz/)

Research Center “SANGE”, Website, [http://sange.kz/](http://sange.kz/)


UDF-KAZ-11-451, *Civil Society Capacity Building Initiative, Mid-Term Progress Report*, 1 March 2014


UDF-KAZ-11-451, *Civil Society Capacity Building Initiative, Project Officer Note*, Undated

UDF-KAZ-11-451, *Civil Society Capacity Building Initiative, Milestone Verification Mission Report, No 1, 7 November 2013*

UDF-KAZ-11-451, *Civil Society Capacity Building Initiative, Milestone Verification Mission Report, No 3, 21 November 2014*

UDF-KAZ-11-451, *Civil Society Capacity Building Initiative, Civil Forum Presentation, PowerPoint 2013*
USAID. *The 2014 CSO Sustainability Index for Central and Eastern Europe and Eurasia*, Washington, DC. 2015

USAID. *The 2012 CSO Sustainability Index for Central and Eastern Europe and Eurasia*, Washington, DC. 2013
## Annex 3: Persons Interviewed

<table>
<thead>
<tr>
<th>Date</th>
<th>Person Name</th>
<th>Title/Role</th>
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<tr>
<td>24 January 2016</td>
<td>Arrival international consultant</td>
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<tr>
<td>25 January 2016</td>
<td>Gaukhar Nursha</td>
<td>Project Manager, Eurasia Foundation of Central Asia</td>
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<td></td>
<td>Rinad Temirbekov</td>
<td>Executive Director, Eurasia Foundation of Central Asia</td>
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<td></td>
<td>Khalda Issayeva</td>
<td>Communication Manager, Eurasia Foundation of Central Asia</td>
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<td></td>
<td>Galina Barsukova</td>
<td>Chief Accountant, Eurasia Foundation of Central Asia</td>
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<td></td>
<td>Vladimir Kleshenko</td>
<td>Accountant, Eurasia Foundation of Central Asia</td>
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<td></td>
<td>Aigerim Abdullayeva</td>
<td>Grants and Contracts Manager, EFCA</td>
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<td></td>
<td>Sagyngali Yelkeyev</td>
<td>Chairman, NGO “Ravnaj Ravnomu”</td>
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<tr>
<td>26 January 2016</td>
<td>Adil Jalilov</td>
<td>Director, Trainer, International Center of Journalism “Media Net”</td>
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<td></td>
<td>Svetlana Ushakova</td>
<td>Director, Trainer, Public Fund “National and International Development Initiatives Institute”</td>
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<td></td>
<td>Vera Voronova</td>
<td>Director, Republican Public Union “Kazakhstani Association for Biodiversity Conservation”, by phone</td>
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<td></td>
<td>Gaukhar Omarova</td>
<td>Director, “Public Union “Umit Uzbeu”, by phone</td>
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<td>Sergey Bogatyrev</td>
<td>Chairman, Public Fund “Association of Mediators of Kostnay Oblast”, by phone</td>
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<td>Alina Orlova</td>
<td>Director, Public Union “Women Support Center”, by phone</td>
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<td></td>
<td>Jessica Howard</td>
<td>Former Research and Development Associate, Eurasia Foundation of Central Asia, by phone</td>
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<tr>
<td>27 January 2016</td>
<td>Travel to Esik</td>
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<td>Bakytgul Yelchibayeva</td>
<td>Chairman, NGO “Foundation of Local Communities of Enbekhikazakhstani Rayon”</td>
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<td></td>
<td>Anel Zhapabayeva</td>
<td>Manager, NGO “Foundation of Local Communities of Enbekhikazakhstani Rayon”</td>
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<td>Asel Imangozhina</td>
<td>Manager, NGO “Foundation of Local Communities of Enbekhikazakhstani Rayon”</td>
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<td>Sara Imbarova</td>
<td>Director, Public Fund “MARTEBE Plus”, by phone</td>
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<td>Zhaksygul Makhanbetova</td>
<td>Chairman, NGO “Zhastar Zhetistiktery”, by phone</td>
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<td>Sholpan Suttibayeva</td>
<td>Director, Public Community “Almaty regional community of disabled people”, by phone</td>
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<td>28 January 2016</td>
<td>Travel to Astana</td>
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<tr>
<td></td>
<td>Irina Buchinskaya</td>
<td>Project Coordinator, Embassy of the Kingdom of the Netherlands</td>
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<td></td>
<td>Andrey Yemelin</td>
<td>Accountability Coach during the project, currently works in USAID</td>
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<td></td>
<td>Ainagul Sharipbayeva</td>
<td>Project Manager, Research Centre “SANGE”, NGO that conducted the NGO Accountability Index</td>
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<td>Makhhabbat Yespenova</td>
<td>Director, Public Fund “KAMEDA Consulting Centre”</td>
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<td>Name</td>
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<tr>
<td>Elena Shvetsova</td>
<td>Director, Public Fund “MISK”</td>
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<tr>
<td>Ulan Shamshet</td>
<td>Director, Public Fund “AYKAP”</td>
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<td>Bakhytnur Otarbayeva</td>
<td>Center Director “NGO Expert Center” in ALMA University</td>
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<td>Zulfiya Baisakova</td>
<td>Chairman, Public Fund “Soyuz Krizisnykh Centrov”</td>
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<td>Rinad Temirbekov</td>
<td>Executive Director, Eurasia Foundation of Central Asia</td>
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Annex 4 : Acronyms

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<td>EFCA</td>
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<tr>
<td>M&amp;E</td>
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<tr>
<td>NGO</td>
<td>Non-Governmental Organization</td>
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<td>TOT</td>
<td>Trainer of Trainers</td>
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<tr>
<td>UNDEF</td>
<td>United Nations Democracy Fund</td>
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