

1. Please describe (cite and summarize) the measures/steps your country has taken, if any, (or is planning to take, together with the related appropriate time frame) to ensure full compliance with this provision of the Convention, and in particular to develop, implement, monitor and evaluate the impact of the country's anti-corruption policies.

a) Development and Implementation Process

In the period from regaining its independence in 1990 till becoming a member of the European Union and NATO in 2004, Lithuania has succeeded in building one of the most comprehensive anti-corruption systems in Europe, based on a multi-faceted approach of preventive and repressive, legal and institutional measures. This can be attributed to a number of factors, including the political commitment of successive governments, strong outside incentives and reform requirements during the accession process to the EU and to the OECD, as well as membership in international anti-corruption monitoring mechanisms such as the Council of Europe's GRECO. The process of legislative reform in the area of corruption has also been facilitated by Lithuania's accession to major international treaties in the field of corruption and its participation in different technical co-operation and evaluation programmes.

The following steps of Lithuania in developing anti-corruption policy were made:

1) In 1993, the President of the Republic established¹ a steering group working to combat organized crime and corruption, which was in charge of coordinating the activities of law enforcement agencies in the fight against organized crime. With some changes of name and functions, this working group was operating until 27 February 1997.

2) In 1993 were established Special unit of prosecutors for fight against corruption and organized crime – Department of Investigations of Organized Crime and Corruption, which was followed in 2001 by reorganization leading to the founding of Department of investigation of organized crime and corruption Prosecutor General's, as separate department in the Prosecutor General's Office. The system of this department includes five regional offices established under the relevant regional prosecutors' offices.

3) On 7 November 1995, the Seimas of the Republic of Lithuania established a special committee to investigate the facts of corruption².

4) In 1996, the Government of the Republic of Lithuania approved the anti-corruption measures plan³, which provided for the following anti-corruption measures: coordination of the activities of authorities in the fight against corruption, assessment of real situation of crimes related to corruption, determining the causes of corruption, providing for the main directions of prevention, organizing training for investigators, assessing legislation governing economic, commercial and financial activities in terms of anti-corruption, preparing draft legislation to revise liability for corruption-related crimes, preparing draft Law on Lobbying Activities.

5) On 18 February 1997, the Government of the Republic of Lithuania set up a Special Investigation Service under the Ministry of the Interior⁴ entrusted with the fight against organized crime, corruption and crimes in civil service. Recognising the need to address corruption through a multi-faceted approach of repression, prevention and education, Lithuania further explored various

¹ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=3055&p_query=&p_tr2=2

² Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=22560&p_query=&p_tr2=2

³ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=25649&p_query=&p_tr2=2

⁴ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=36058&p_query=&p_tr2=2

models of anti-corruption institutions, and decided to follow the well-publicised Hong Kong model. In 2000, the Law on the Special Investigation Service was adopted, which created an independent institution with a broad mandate in the fields of investigation and prevention of corruption. Building on the material and human resources of its predecessor, the new institution became operational within a month from the adoption of the law.

The Special Investigation Service has been designed as a focal anti-corruption body to detect, investigate and prevent corruption offences, to provide education in the field of corruption, to ensure co-ordination of the anti-corruption measures between state and municipal bodies as well as with the civil society and the private sector, and to co-ordinate anti-corruption strategies at the national and local level. The main objectives of the Special Investigation Service are to create a national system of corruption prevention, to improve the legal anti-corruption framework, to develop corruption-related data and analyses, and to develop international relations to combat corruption.

6) In 1999, the Government of the Republic of Lithuania approved the Program⁵ for the Prevention of Organized Crime and Corruption, which provides for a greater focus on proper data collection, improvement of the legal framework, strengthening of corruption prevention, training and methodological recommendations.

7) In 1999, the Government of the Republic of Lithuania established a working group⁶ for the preparation of anti-corruption strategy.

8) On 1 June 2000, the Seimas of the Republic of Lithuania adopted a decision establishing the Special Investigation Service of the Republic of Lithuania (hereinafter – STT)⁷, the main task of which is to guard and protect individuals, society, and the State from corruption, and to conduct prevention and detection of corruption.

9) In 2001, the Government of the Republic of Lithuania approved the anti-corruption strategy⁸, the main goal of which was to reduce corruption in Lithuania, reduce the impact of corruption on the development of economy and democracy to the maximum possible extent and achieve social welfare. The strategy provided that it was necessary to limit political corruption, administrative corruption, investigate crimes related to corruption better, consistently implement public education and awareness, engage the public in the fight against corruption. A national scheme of subjects implementing the anti-corruption strategy was developed.

10) In 2001, the Seimas of the Republic of Lithuania adopted a resolution⁹ on the fight against corruption, which paid a great attention to the determining of conditions of the appearance of corruption; moreover, it was also planned that investigation of the level of corruption in Lithuania should be performed. Such investigations referred to as “The Lithuanian Map of Corruption”¹⁰ were carried out in 2004, 2005, 2007, 2008, 2011, 2014 and 2016¹¹. The Lithuanian Map of Corruption determine various corruption-related indicators, e.g. most corrupt procedures etc.

⁵ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=71424&p_query=&p_tr2=2

⁶ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=86328&p_query=&p_tr2=2
http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=78444&p_query=&p_tr2=2

⁷ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=110823

⁸ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=149412&p_query=&p_tr2=2

⁹ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=133398&p_query=&p_tr2=2

¹⁰ Access via the Internet: <http://www.stt.lt/lt/menu/tyrimai-ir-analizes/#turinys>

<http://www.stt.lt/lt/menu/tyrimai-ir-analizes/%23turinys>

¹¹ Access via the Internet: https://www.stt.lt/documents/eng/2016_LKZ_pazyma_ENG.doc

11) In 2002, the Seimas of the Republic of Lithuania adopted the Law on Corruption Prevention¹², which provides for the following measures to prevent corruption:

- 1) determining the probability of manifestation of corruption;
- 2) corruption risk analysis;
- 3) anti-corruption programmes;
- 4) anti-corruption assessment of legal acts or their drafts;
- 5) provision of the information about a person seeking or holding office at a state or municipal agency;
- 6) provision of the information to the registers of public servants and legal entities;
- 7) education and awareness raising of the public;
- 8) public disclosure of detected corruption cases.

12) In 2002, the Seimas of the Republic of Lithuania approved the National Anti-Corruption Programme¹³, which was updated every four years. The programme last updated and launched in 2011. Measures provided for in it were in force until 2014. The programme was one of the key sources of anti-corruption measures. This programme provided for 95 anti-corruption measures, which carried out by more than 70 state and municipal agencies within their competence.

13) In 2003, the Government of the Republic of Lithuania established an Interagency Committee for the Coordination of the Fight Against Corruption¹⁴.

This was a non-permanent body set-up in 2003 under the Government of the Republic of Lithuania consisting of senior representatives of different ministries and other bodies, e.g. the STT, business representatives which met periodically to review and discuss co-ordination of the implementation of the National Anti-Corruption Programme, as well as other activities of central and local government institutions and agencies in the areas of corruption-prevention and detention of corruption-related violations of law.

The main tasks were:

- 1) to coordinate the development and implementation of the National Anti-Corruption Programme of the Republic of Lithuania, control the implementation of the plan of measures of the programme as well as other activities of state and municipal authorities in the areas of corruption prevention and detection of corruption-related offenses;
- 2) to discuss strategic issues of the fight against corruption;
- 3) to improve the activities of state and municipal authorities in the areas of corruption prevention and detection of corruption-related offenses.

14. In 2015 was adopted the new strategy – the National Anti-corruption Programme of the Republic of Lithuania for 2015-2025 (hereinafter – the Programme). The purpose of this Programme¹⁵ is to ensure the long-term, effective and targeted anti-corruption and control system in the Republic of Lithuania. The Programme covers the major provisions of the national anti-corruption policy in the public and private sectors. More specifically, it is geared towards the reduction and elimination of corruption conditions and risks, as well as corruption risk management and assuming of liability for corruption-related offences. The Programme also identifies the problems related to corruption in the private sector and to be addressed during the Programme period. Much attention is given to anti-corruption education and improvement of awareness-raising campaigns. The main directions of measures are:

¹² Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=212525

¹³ Access via the Internet: <http://www.stt.lt/documents/laws/programe.pdf>

¹⁴ Access via the Internet: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.204871/PjujdWYwZl?ifwid=2vcao5540>

¹⁵ Access via the Internet: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=1040477

- 1) Increasing publicity, openness, transparency, in the provision of public services and making decisions.
- 2) Improving the quality of management.
- 3) Increasing awareness and fairness of employee and society.
- 4) Increasing opportunities for public scrutiny.
- 5) Reducing the burden on business.
- 6) Publicity income and expenditure.
- 7) Reducing conflict of interest.
- 8) Anti-corruption education.

The Programme ensures a long-term, effective and targeted anti-corruption and control system in the Republic of Lithuania in 2015–2025. The Programme covers the most important provisions of the national anti-corruption policy in the public and private sectors. The Programme focus on reducing and eliminating the conditions and risks of corruption, as well as managing corruption risks and enforcing liability for corruption offences.

According to Article 5(1) of the United Nations Convention against Corruption establishes that each state party to the Convention shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper governance and management of public property, integrity, transparency and accountability.

Therefore the Programme lists the priority fields with the highest potential for corruption: political activities and legislation; activities of the judiciary and law enforcement institutions; public procurement; healthcare and social security; spacial planning, state supervision of construction and waste management; supervision of activities of economic entities; public administration, civil service and asset management. Furthermore, corruption-related problems of the private sector are singled out to be dealt with in the course of implementation of the Programme.

Objectives of the Programme:

- Striving for greater management efficiency in the public sector, transparency and openness of decision making and procedures, accountability to the public and higher resilience to corruption in the civil service.
- Ensuring the application of the principle of unavoidable liability.
- Reducing the supervisory and administrative burden on economic entities by transforming the system of institutions carrying out the supervision of economic entities.
- Ensuring fair competition and transparent and rational purchase of supplies, works or services in public procurement.
- Increasing transparency, reducing and eliminating possibilities of manifestations of corruption in the field of healthcare.
- Promoting zero tolerance for corruption and encouraging the involvement of the public in anti-corruption activities.

The Programme also includes measures for society, for example:

1) According to the first task of the first Programme objective – improving the quality of administrative and public service provision, increasing the transparency and openness of decision making and procedures, accountability to the public and making the civil service more resilient to corruption, this task shall be implemented:

1.1. by increasing the transparency and accountability of state governance system, public administration, state and municipal bodies and the civil service by way of creating a system for

publicising state and municipal bodies' expenditure and revenue thus providing better opportunities for public scrutiny;

1.2. by increasing the transparency of funding of political parties and political campaigns and their activities, creating a system for online voting, facilitating better public access to activities and funding of political parties and political campaigns.

2) According to the task of the sixth Programme objective – developing anti-corruption education in the public and private sectors, this task shall be implemented:

2.1. by carrying out public anti-corruption education as an integral part of education of the public;

2.2. by carrying out anti-corruption education of target groups of society and the fields of the public and private sectors at risk;

2.3. by state and municipal bodies providing information on the reasons underlying corruption, damage done by corruption and their activities in tackling corruption to civil servants, equivalent persons, other employees and the public through the media and by other means and in accordance with the procedure established by the heads of those bodies.

STT also actively communicates through the mass media and otherwise information about the activity of the STT, the rights of members of the public and opportunities to report corruption.

The website of the STT is regularly updated with information relevant to the public about STT activities and opportunities to contribute to reducing the level of corruption all over the country. The STT organises the broadcasting of audio and video social advertising, encourages resisting and reporting corruption and continually commissions articles of an educational character in the mass media. STT officials take part in public discussions on TV and radio.

In providing purposive anticorruption education to 4 social groups – representatives of civil service and the private sector, schoolchildren, youth (students) – in 2017, STT delivered 213 lectures and seminars, organised or participated in 77 anti-corruption events, prepared 203 press releases to the mass media and 26 publications on the anti-corruption theme, took part in 132 TV and radio broadcasts.

According to the data of the Market Research and Public Opinion company “Baltijos tyrimai”, an increase in the annual average number of people who trust STT is observed: from 39 per cent in 2013 to 53 per cent in 2017.

In 2017, main attention in the field of anti-corruption education was devoted to the riskiest spheres of the public sector: public procurement, health care and self-government. 84 per cent of seminars conducted in that sector were devoted to the representatives of these spheres in the state or municipal institutions. During the reference period more than 6,000 people took part in our lectures. 26 lectures were delivered at the health institutions, with 1,120 medical professionals participating in them.

The implementation of the Programme is organised and controlled by the Government with the participation of the STT. The Programme is implemented by the ministries, the STT, the Prosecutor General's Office of the Republic of Lithuania, the Public Procurement Office, the Chief Official Ethics Commission, the Central Electoral Commission of the Republic of Lithuania and other state and municipal institutions and bodies within their remit. Non-governmental organisations, the groups of society concerned and private sector entities may contribute to the implementation of the Programme and achievement of its objectives and tasks.

The Programme also includes an inter-institutional action plan for the implementation of the strategy for 2015–2019, which is coordinated by **Interagency Commission for the Coordination of the**

Fight Against Corruption led by Minister of Justice (from 2018 November 21 this Commission is called the **Government commission to coordinate the fight against corruption**¹⁶ and is being chaired by the Prime Minister). The Commission ensures horizontal coordination including representatives from various public legal entities as well as from non-governmental business organisation. The Programme also provides for vertical coordination as each public legal entity must report on an annual basis to the Commission on whether their objectives with respect to the implementation of the plan were achieved. The Commission conducts performance assessments of corruption prevention measures in each public entity based on that information.

Special investigation service (STT) is an independent anticorruption institution accountable to the President and the Parliament of the Republic of Lithuania. It was set up in 1997. The key areas of STT activity are law enforcement, corruption prevention, analytical anticorruption intelligence and anticorruption education.

The first articles of the Law on the Special Investigation Service show STT legal basis, composition, functions, and powers.

STT shall be guided by the Constitution of the Republic of Lithuania, the laws of the Republic of Lithuania, international treaties, the Statute of the Service, and other legal acts.

The tasks of the Special Investigations Service are to perform, in accordance with the procedure established in the laws of the Republic of Lithuania and other legal acts, criminal persecution due to corruption-related crimes, criminal intelligence, corruption prevention, anticorruption education of the public and public awareness raising, analytical anti-corruption intelligence and other tasks assigned to the Special Investigations Service in the laws and other legal acts.

Pursuing its activity objective and implementing tasks assigned to it, the STT shall have the following rights:

- 1) receive free of charge data of the state information resources and documents as well as other information necessary to carry out the functions of the Special Investigations Service from government and municipal authorities, institutions and enterprises, the State- and municipality managed enterprises, enterprises whose shareholder is the State or a municipality, public institutions that are established, owned or co-owned by the State or a municipality;
- 2) receive free of charge and in accordance with the procedure set forth by the Director of the Special Investigations Service, information on the legal person's economic and financial operations and use of financial and/or payment measures, necessary to carry out the functions of the Special Investigations Service, from banks, financial and credit companies, credit institutions and other legal entities;
- 3) obtain explanations and other information from persons necessary to implement the tasks of the Special Investigations Service;
- 4) in accordance with the procedure set forth by the Director of the Special Investigations Service, analyse statements of persons having applied to the Special Investigations Service, and having determined a potential legal violation assigned to the remit of another law enforcement agency or a public administration entity, transfer the potential legal violation to the agency or entity based on the remit;
- 5) not to disclose the identity of applicants to the Special Investigations Service to any third parties or circumstances of applying that allow the direct or indirect identification of such an applicant;
- 6) check personal identification documents whenever it is needed to implement at least one task of the Special Investigations Service, and deliver persons suspected of having committed a criminal act to the Special Investigations Service and police agencies;
- 7) and others.

¹⁶ Access via the Internet: <https://www.e-tar.lt/portal/legalAct.html?documentId=09ac0800f7c411e880d0fe0db08fac89>

STT has the following duties:

- 1) within its remit, participate in implementing the National Security Strategy, the National Anti-Corruption Programme and other crime control and prevention programmes;
- 2) monitor, summarise and participate in coordination of actions of other government, municipal and non-governmental institutions to implement the National Anti-Corruption Programme and other corruption control and prevention programmes;
- 3) report in writing, at least once a year, to the President of the Republic of Lithuania and the Seimas about the results of the Special Investigations Service activities, changes significant in terms of reducing the spread of corruption in the Republic of Lithuania, and submit its proposals on the formation of anti-corruption environment;
- 4) provide public information on the Special Investigations Service activities to the society;
- 5) perform other obligations prescribed by the laws to the Special Investigations Service or the officers.

The Chief Official Ethics Commission (COEC). Established in 1999, COEC is an independent institution accountable to the Parliament and comprising five members (the President of the Republic; the President of the Parliament; and the Prime Minister each appoints one member, and the Minister of Justice appoints two) assisted by a small permanent Secretariat. Under the Law on the Adjustment of Public and Private Interests and the Law on the Prevention of Corruption, COEC is the main control institution in the area of prevention of conflicts of interest of high-level public officials and the central authority in the field of public ethics, providing expertise and recommendations concerning anti-corruption programmes and legal reforms in this field. COEC receives, and within its scope of jurisdiction investigates, complaints from the general public; it can initiate investigations on the basis of information received. While performing investigations, it has the right to access information and documents from all other institutions, and may refer cases to the prosecution authorities or courts.

The status of the COEC, legal basis of its activities, procedures for setting up, competence and organisational structure are regulated by the Law on the Chief Official Ethics Commission (hereinafter – the Law on the COEC).

In accordance to the Article 17 of mentioned Law, the COEC has such powers:

- 1) supervises the implementation of the Law on the Adjustment of Interests, the Law on Lobbying Activities, other legal acts regulating the norms of official ethics and conduct of persons in the civil service assigned to the competence of the COEC; gives recommendations on the improvement and implementation of the provisions of these legal acts; takes decisions and resolutions on these issues;
- 2) investigates notifications, complaints and requests of natural and legal persons regarding the conformity of actions of the persons in the civil service with the provisions of the Law on the Adjustment of Interests and the Law on Lobbying Activities;
- 3) carries out the investigation of the conduct of Chairmen and Deputy Chairmen of parliamentary political parties who are not members of the Seimas or municipal councillors, or are not appointed as Member of the Government in accordance with the procedure set forth by the Code of Conduct for State politicians;
- 4) upon the request or on its own initiative provides methodological assistance concerning the implementation of the provisions of the Code of Conduct for State Politicians;
- 5) makes recommendations of a methodological nature to municipal ethics commissions and provide consultations to them on the issues regarding the implementation of the Law on the Adjustment of Interests;
- 6) follows information announced by the mass media about the conduct of state politicians and,

in case there are sound data that a state politician has committed a violation, transfer this information for investigation to appropriate entities of state politicians' conduct control;

7) analyses problems related to official ethics and conduct of persons in the civil service and gives relevant recommendations;

8) on the basis of available information prepares and implements the measures preventing violations of the norms of official ethics and conduct, fulfils other functions laid down for the COEC in legal acts, and takes appropriate decisions;

9) seeking to include the civic society as widely as possible in the democratic mechanisms of control over state government, informs periodically the public, state and municipal institutions about the meaning and importance for state government of the norms of official ethics and conduct of persons in the civil service and the legal acts regulating them; publicly informs about its activities on the website of the COEC; publishes its decisions and resolutions; etc.

To carry out of its functions, the COEC has granted with powerful rights, e.g.:

1) receive all necessary information, explanations, orders, decisions and other documents from institutions, enterprises, bodies and other organizations, also obtain free of charge the information from state or departmental registers, which is necessary in order to fulfil the duties of the COEC;

2) instruct the head of a state or municipal institution or body to conduct investigation, if the reasoned information has been received that a person in the civil service does not meet the requirements of the Law on the Adjustment of Interests, and, when disagreeing with the conclusion of the conducted investigation, instruct to conduct investigation repeatedly or conduct investigation itself and take its own decision;

3) make reports of administrative violations and impose on the administrative sanction (The COEC is granted by the right to impose on the administrative sanction from the January 1, 2017 only. Previously the COEC in such cases had to appeal to the Court) if the person has violated the provisions of the Law on the Adjustment of Interests;

4) propose to the collegial state or municipal institution, the head of the state or municipal body, or the state or municipal institution or body of a higher subordination level to impose disciplinary penalties on the persons who have violated the Law on the Adjustment of Interests; or propose to repeal, suspend or amend the legal acts or decisions and transactions which do not meet the requirements of the Law on the Adjustment of Interests or the Law on Lobbying Activities, or propose to take the measures which would prevent violations of other legal acts in the future;

5) file claims (submit requests) to the court regarding termination of or declaring null and void the civil service relationships, employment contracts and transactions concluded in violation of the requirements of the Law on the Adjustment of Interests;

6) participate in preparation of legal acts regulating the requirements of official ethics and conduct of persons in the civil service;

7) check the data on private interests declared by persons in the civil service;

8) adopt resolutions of recommendatory character, which contain the opinion of the COEC on a certain issue or summarise the practice of activities of the COEC;

9) inspect activities of lobbyists and activity reports of lobbyists; and so forth.

Department of Organised Crime and Corruption within the Prosecutor General's Office (DOCC). The DOCC is a specialised prosecution unit with jurisdiction to commence and conduct prosecution against organised crime and corruption related offences; to conduct, co-ordinate or supervise pre-trial investigations in this area. Specialised divisions within the Prosecution Service with jurisdiction over organised and corruption offences have been created already in 1993. In 2001, these were restructured into the DOCC, which is a separate department within the Prosecutor General's Office.

b) Monitoring and Evaluation

As was mentioned above, the implementation of the Programme is organised and controlled by the Government with the participation of the STT. The monitoring of the implementation of Programme is done by the STT.

The progress achieved by promoters of the Programme and other state and municipal bodies in a specific field is assessed according to the performance targets and their indicators specified in the Programme and its Action Plan, approved by the Government.

The strategic aim of this long-term anti-corruption programme is to reduce the scope of corruption, to increase transparency, openness in the public and private sectors, to achieve that:

- in 2025, the Lithuania's corruption perception index should be lower than 70 points (in 2016 the Lithuania's corruption perception index was 59 points);
- in 2025, the number of Lithuanian respondents (residents, business people and civil servants) who indicated that a bribe helped solve problems should not exceed 33 per cent;
- in 2025, the number of Lithuania respondents (residents, business people and civil servants) who stated that in the past 5 years they paid a bribe should not exceed 10 per cent.

ASSESSMENT CRITERIA OF THE IMPLEMENTATION OF THE PROGRAMME AND THEIR VALUES

| Serial No | Name of the assessment criterion | Value of the assessment criterion | | | Institution or body carrying out the monitoring of achievement of the assessment criterion (source of data) |
|---|--|-----------------------------------|------|------|---|
| | | Initial value | 2019 | 2025 | |
| Strategic objective of the Programme – reducing the scope of corruption, increasing transparency and openness in the public and private sectors. | | | | | |
| 1. | Results of the Corruption Perceptions Index survey carried out by Transparency International (on a scale out of 100); at least the indicated number of points. | 58 (Result for 2014) | 65 | 70 | Special Investigation Service, Ministry of Justice |
| 2. | Decrease in the average (in per cent) of Lithuanian residents, businessmen, civil servants who have indicated that a bribe helps tackle issues. | 55 (Results for 2014) | 45 | 33 | Special Investigation Service (data of the survey Lithuanian Map of Corruption) |
| 3. | Decrease in the average (in per cent) of Lithuanian residents, heads of undertakings, civil servants who have paid a bribe within the last five years. | 31 (Results for 2014) | 20 | 10 | Special Investigation Service (data of the survey Lithuanian Map of Corruption) |

| Serial No | Name of the assessment criterion | Value of the assessment criterion | | | Institution or body carrying out the monitoring of achievement of the assessment criterion (source of data) |
|--|--|-----------------------------------|------|------|---|
| | | Initial value | 2019 | 2025 | |
| First objective of the Programme – striving for greater management efficiency in the public sector, transparency and openness of decision making and procedures, accountability to the public and higher resilience to corruption in the civil service. | | | | | |
| 4. | Share (in per cent) of respondents who believe that corruption in Lithuania is widespread. | 95 (Results for 2013) | 75 | 50 | Special Investigation Service (data of the Eurobarometer) |
| Second objective of the Programme – ensuring the application of the principle of unavoidable liability. | | | | | |
| 5. | Share of respondents who believe that the Government efforts in tackling corruption are effective; at least the indicated percentage. | 17 (Results for 2013) | 32 | 50 | Special Investigation Service (data of the Eurobarometer) |
| 6. | Share of respondents who believe that there are enough successful cases of prosecution in Lithuania dissuading people from corrupt practices; at least the indicated percentage. | 26 (Results for 2013) | 39 | 60 | Special Investigation Service (data of the Eurobarometer) |
| Third objective of the Programme – reducing the supervisory and administrative burden on economic entities by transforming the system of institutions carrying out the supervision of economic entities. | | | | | |
| 7. | Share of respondents who believe that corruption poses a problem for them to develop business; not more than the indicated percentage. | 36 (Results for 2013) | 30 | 20 | Special Investigation Service (data of the Eurobarometer) |
| 8. | Share of respondents who believe that a bribe was expected of them as economic entities; not more than the indicated percentage. | 8 (Results for 2013) | 5 | 3 | Special Investigation Service (data of the Eurobarometer) |
| 9. | Share of respondents who believe that political influence and nepotism pose a problem to business in Lithuania; not more than the indicated percentage. | 24 (Results for 2013) | 19 | 10 | Special Investigation Service (data of the Eurobarometer) |
| Fourth objective of the Programme – ensuring fair competition and transparent and rational purchase of supplies, works or services in public procurement. | | | | | |

| Serial No | Name of the assessment criterion | Value of the assessment criterion | | | Institution or body carrying out the monitoring of achievement of the assessment criterion (source of data) |
|---|---|-----------------------------------|------|------|---|
| | | Initial value | 2019 | 2025 | |
| 10. | Share of the value of electronic contracts (as compared to the value of all the completed electronic procurement procedures) based on the data published by the Public Procurement Office; at least the indicated percentage. | 90 (Results for 2013) | 94 | 97 | Public Procurement Office |
| Fifth objective of the Programme – increasing transparency, reducing and eliminating possibilities of manifestations of corruption in the field of healthcare. | | | | | |
| 11. | Share of respondents who believe that a bribe is requested or expected from them when receiving a service; not more than the indicated percentage. | 29 (Results for 2013) | 24 | 15 | Special Investigation Service (data of the Eurobarometer) |
| Sixth objective of the Programme – promoting zero tolerance for corruption and encouraging the involvement of the public in anti-corruption activities. | | | | | |
| 12. | Share of respondents who have paid a bribe related to public services within the last twelve months; not more than the indicated percentage. | 26 (Results for 2013) | 21 | 10 | Special Investigation Service (data of the Global Corruption Barometer) |
| 13. | Share of respondents who tolerate corruption; not more than the indicated percentage. | 62 (Results for 2013) | 47 | 30 | Special Investigation Service (data of the Eurobarometer) |

CRITERIA FOR THE EVALUATION OF THE ACTION PLAN AND THEIR VALUES

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|------------------------|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| 1. | Objective: seek enhanced efficiency in the management of the public sector, transparency of decisions and procedures, transparency and accountability to the society, enhanced resilience to corruption of the civil service | | | | | | |
| R-1-1 | Share of the respondents who believe that corruption is pervasive in | | 87 | 83 | 79 | 75 | |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|---|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| | Lithuania (percentage of Lithuanian population) | | | | | | |
| 1.1. | Task: improve the quality of administrative and public services, enhance the transparency of decisions and procedures, transparency and reporting to the society, strengthen the resilience of civil service to corruption | | | | | | |
| P-1-1-1 | Developed and operational information system designed to publish the information about the income of the State and municipalities, sources of income, expenses and beneficiaries (units) | | | | 1 | | Ministry of Finance |
| P-1-1-2 | Developed system allowing to obtain comprehensive information about election and voting procedure, one's participation in the elections and a donations to a participant of the political campaign (units) | | | | 1 | | Central Electoral Commission of the Republic of Lithuania |
| P-1-1-3 | Developed and made operational the Private Interest Register | | | | 1 | | Chief Official Ethics Commission |
| P-1-1-4 | Operational procedure providing for the registration of the additional data of producers and multipliers of public information (shareholders of legal person, its managers, publications, income, sources of income, expenses and beneficiaries) | | | 1 | | | Ministry of Justice |
| P-1-1-5 | Recommendations for ensuring transparent cooperation between the public and the private sectors (units) | | | 1 | | | Chief Official Ethics Commission |
| P-1-1-6 | Developed and implemented Corruption Prevention Information System (units) | | | | 1 | | Special Investigation Service |
| P-1-1-7 | Total corruption prevention and corruption investigation specialists who have been improving knowledge and skills in Lithuania and abroad (units) | | 220 | 220 | 220 | | Special Investigation Service |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|---|-----------------------------------|------|------|------|------|--|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| P-1-1-8 | The information system for the electronic auction for the sale of public and municipal assets developed and made operational | | | | 1 | | Centre of Registers |
| P-1-1-9 | Increase in the number of visa issue centres (units) | | 6 | | | | Ministry of Foreign Affairs of the Republic of Lithuania |
| 1.2. | Task: reducing the appearance of preconditions for corruption by increasing the transparency of territorial planning and state supervision of construction and reducing the administrative burden for service recipients. | | | | | | |
| P-1-2-1 | Improvements introduced in all Information systems of the state supervision of drawing up of territorial planning documents and the territorial planning process (enhanced functionality and adaptability for consumer needs), also the planning document register in the territories of the Republic of Lithuanian, electronic services intended to be improved according to the design documents of the Infostatyba information systems (percent) | | | | 80 | | Ministry of the Environment of the Republic of Lithuania |
| 2. | Objective: ensuring the application of the principle of unavoidable liability | | | | | | |
| R-2-1 | Share of the respondents who believe that the efforts of the Government fighting corruption are effective (percentage of Lithuanian population) | | 23 | 26 | 29 | 32 | |
| R-2-2 | Share of the respondents believing that there is a sufficient number of persecution cases deterring from corruption practice (percentage of Lithuanian population) | | 32 | 35 | 37 | 39 | |
| 2.1. | Task: enhance and form intolerance to corruption, promote civil activity | | | | | | |
| P-2-1-1 | drawing up of a package of legal acts ensuring that reliable and secure information transmission channels are created for notifications about alleged | | 1 | | | | Ministry of Justice |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|----------------------------------|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| | cases of corruption in the public and private sectors (units) | | | | | | |
| P-2-1-2 | Programme of training on official ethics (units) developed | | | | | 1 | Chief Official Ethics Commission |
| P-2-1-3 | Manual on the development and implementation of anti-corruption environment in the public and private sectors (units) | | | | 1 | | Special Investigation Service |
| P-2-1-4 | Total seminars on anti-corruption environment creation in the public and the private sector (units) | | 6 | 6 | 10 | 10 | Special Investigation Service |
| 2.2. | Task: strengthening of capacities of law enforcement for the purpose of detecting criminal activities of corruption nature | | | | | | |
| P-2-2-1 | Total persons attending the training for pre-trial investigation officers and prosecutors regarding investigation of criminal acts of corruption nature and enforcing public prosecution in this category of cases (5 days' training of 40 academic hours) (units) | 165 | 165 | 165 | 165 | | Prosecutor's General Office |
| P-2-2-2 | Survey of institutions with a view to establishing the reasons for corruption and fraud, risk factors and problems in the area of the use of European Union funding, and the possible prevention means (units) | | 1 | | | | Ministry of Finance |
| P-2-2-3 | Decrease in the number of persons acquitted for criminal acts of criminal nature (in per cent, as compared to the previous year) | | -2 | -2 | -2 | -2 | Prosecutor's General Office |
| P-2-2-4 | Increase in the number of investigated actions of criminal nature (in per cent, as compared to the previous year) | | 2 | 2 | 2 | 2 | Prosecutor's General Office |
| 2.3. | Task: ensuring adequate criminalisation of criminal acts of corruption nature | | | | | | |
| P-2-3-1 | Research conclusions regarding the possibilities and methods of the implementation of the international | | 1 | | | | Lithuanian Institute of Law |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|------------------------|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| | obligations assumed by Lithuania, and those on the European Union level regarding corruption in the private and the public sectors (units) | | | | | | |
| 3. | Objective: reducing the supervisory and administrative burden on economic entities by transforming the system of public and municipal authorities carrying out the supervision of economic entities | | | | | | |
| R-3-1 | Share of the respondents who believe that corruption is an obstacle for developing business (percentage of Lithuanian population) | | 34 | 33 | 31 | 30 | |
| R-3-2 | Share of the respondents believing that a bribe as expected from them as business entities (percentage of all residents of Lithuania) | | 7 | 6 | 6 | 5 | |
| R-3-3 | Share of the respondents believing that political influence and nepotism is a problem for business in Lithuania (percentage of Lithuanian population) | | 22 | 21 | 20 | 19 | |
| 3.1. | Task: improve the transparency of bankruptcy proceedings | | | | | | |
| P-3-1-1 | Possibility for all auction sales at which, in the cases established by laws the assets of an undertaking in bankruptcy, a bankrupt undertaking, or a natural person against whom bankruptcy proceedings have been initiated must be sold, can be conducted electronically (units) | | | | 1 | | Centre of Registers |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|--|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| 4. | Objective: ensure fair competition, transparent and rational procurement of goods, works, and services according to public procurement procedures | | | | | | |
| R-4-1 | Share of the value of electronic procurements according to the public data of the Public Procurement Office (percentage of the total value of the public procurement) | | 91 | 92 | 93 | 94 | Public Procurement Office |
| 4.1. | Task: strengthen the oversight of public procurement procedures, reduce and eliminate identified corruption factors, develop and implement additional prevention measures in contracting authorities in order to identify instances of corruption at different public procurement stages | | | | | | |
| P-4-1-1 | Strengthening of skills of employees of the Public Procurement Office (training, courses, secondment, etc.) (units) | | 15 | 30 | 30 | 30 | Public Procurement Office |
| P-4-1-2 | Training for representatives of contracting authorities (total participants) | | 100 | 300 | 350 | 500 | Public Procurement Office |
| P-4-1-3 | Supplementing the CPO LT electronic catalogues with new procurement modules (units) | | 2 | 2 | 2 | | CPO LT |
| P-4-1-4 | New Central public procurement information system (units) | | | | | 1 | Public Procurement Office |
| P-4-1-5 | Training (expert assistance) for public administration institutions and entities carrying out innovative and pre-commercial procurements (total participants) | | 50 | 80 | | | Agency for Science, Innovations and Technologies |
| 5. | Objective: enhance transparency, reduce and eliminate possibilities for corruption in the areas of healthcare and social security | | | | | | |
| R-5-1 | Share of Lithuanian residents believing that they were requested or expected to give a bribe in relation to accessing services (percentage of Lithuanian population) | | 27 | 26 | 25 | 24 | |
| R-5-2 | Declaration of private interests of heads of persons healthcare institutions, other | | 100 | 100 | 100 | 100 | Ministry of Health |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|------------------------|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| | healthcare specialists working at budgetary and public institutions (in percent) | | | | | | |
| 5.1. | Task: transform the system for coordination of healthcare institutions, increase the transparency in the activities of healthcare institutions | | | | | | |
| P-5-1-1 | Number of healthcare institutions whose heads and other healthcare specialists working at budgetary or public institutions have been trained on avoiding the situations of conflicts of public and private interests (units) | | 10 | 14 | 18 | 19 | Ministry of Health |
| P-5-1-2 | An integrated system for monitoring and assessment of manifestation of corruption in the healthcare system (units) | | | 1 | | | Ministry of Health |
| P-5-1-3 | Share of healthcare system employees tolerating corruption (in percent) | | 50 | 45 | 40 | 35 | Ministry of Health |
| P-5-1-4 | Sessions of training dedicated for strengthening of resilience (intolerance) of employees of healthcare institutions to corruption (units) | | 2 | 5 | 7 | 8 | Ministry of Health |
| P-5-1-5 | Total events, social advertising campaigns dedicated to prevention of corruption (units) | | 2 | 3 | 3 | 3 | Ministry of Health |
| 5.2. | Task; build up a mechanism for the system of support to healthcare institutions | | | | | | |
| P-5-2-1 | Created system of support to healthcare institutions | | | 1 | | | Ministry of Health |
| 6. | Objective: increase the public intolerance towards corruption, and promote the society to engage into anti-corruption activities | | | | | | |
| R-6-1 | Share of the residents of Lithuania who have in the course of the past 12 years given bribes related to public services (percentage of Lithuanian population) | | 24 | 23 | 22 | 21 | |

| Evaluation criterion code | Names of objectives, tasks, and evaluation criteria | Values of the evaluation criteria | | | | | Implementing authority |
|---------------------------|--|-----------------------------------|------|------|------|------|-----------------------------------|
| | | 2015 | 2016 | 2017 | 2018 | 2019 | |
| R-6-2 | Share of Lithuanian residents tolerating corruption (percentage of Lithuanian population) | | 56 | 53 | 50 | 47 | |
| 6.1. | Task: develop education of the society on corruption in the public and the private sectors | | | | | | |
| P-6-1-1 | Developed TV and radio of stories and footage material on the progress of public and municipal authorities in implementing prevention of corruption, and implementation of the measures designed under the Programme (units) | | 2 | 3 | 4 | | Special Investigation Service |
| P-6-1-2 | Delivered annual television, radio and internet information and educational campaigns dedicated to reducing the risk for occurrence and proliferation of corruption risk (units) | | 3 | 3 | 3 | | Special Investigation Service |
| P-6-1-3 | Developed programme for informal anti-corruption education of the adults (units) | | 1 | | | | Ministry of Education and Science |

With a view to consistently assessing the progress achieved, identifying obstacles and problems in implementing the Programme as well as aiming to identify the fundamental and most relevant corruption-related problems in specific fields of the public and private sectors, the STT shall carry out analysis and, at least once a year after the close of the year, submit to the Government commission to coordinate the fight against corruption summarised information on the identified fundamental and most relevant corruption-related problems in the separate fields of the public sector and corruption risk factors. This information may be accompanied by proposals on the revision of the Programme and/or its implementing documents. The STT shall publish this information and forward it to the state or municipal bodies concerned and the latter shall take note of it when drawing up and implementing corruption prevention measures.

Half a year before the established end of the period of implementation of the Programme, the STT shall draw up and submit to the Commission the final (*ex post*) assessment of the implementation of the Programme.

More information could be found here:

- Anti-Corruption Programmes <http://www.stt.lt/en/menu/corruption-prevention/anti-corruption-programmes/#turinys>
- Implementation documents of National Anti-Corruption Programme <http://www.stt.lt/lt/menu/nacionaline-kovos-su-korupcija-programa/nkcp-2015-2025/-igyvendinimo-dokumentai/>
- Corruption Risk Analysis <http://www.stt.lt/en/menu/corruption-prevention/corruption-risk->

[_ analysis/#turinys](#)

- Research and Analysis <http://www.stt.lt/en/menu/corruption-prevention/research-and-analysis/>

- Probability of Corruption Manifestation <http://www.stt.lt/en/menu/corruption-prevention/probability-of-corruption-manifestation-/#turinys>

2. Please outline the actions required to ensure or improve the implementation of the measures described above and any specific challenges you might be facing in this respect.

a) Development and Implementation Process

As was mentioned above the objective of the National Anti-corruption Programme of the Republic of Lithuania for 2015–2025 (<https://www.stt.lt/en/menu/corruption-prevention/anti-corruption-programmes/>) is to ensure a long-term, effective and targeted anti-corruption and control system in the Republic of Lithuania in 2015-2025.

The Programme covers the most important provisions of the national anti-corruption policy in the public and private sectors (*More about anti-corruption policy programme please see above in sector I*).

To implement the objectives and tasks of the Programme, the Government approved an inter-institutional action plan providing for the implementing measures of the Programme and funds for their implementation.

The inter-institutional action plan for the implementation in 2015–2019 of the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025 (hereinafter – Action Plan) was developed on the basis of the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025 approved by Resolution No. XII-1537 of 10 March 2015 of the Seimas of the Republic of Lithuania ‘On the approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015–2025’

The purpose of the Action Plan is to ensure a coordinated and smooth implementation of the Programme on a timely basis. The drawing up of the plan was qualified by the need to ensure the continuity of the current anti-corruption activity, and a long-term, efficient and focused system of corruption control and prevention in the Republic of Lithuania. The purpose of the Action Plan is while seeking to ensure an efficient implementation of the Programme, and maintain its continuity, consistently and efficiently improve the corruption prevention and control system, ensure the continuity of control and prevention measures, by exercising positive impact upon different areas of public life and increasing transparency in the State.

More about Action plan please see here: <https://www.stt.lt/en/menu/corruption-prevention/anti-corruption-programmes/#turinys>.

Also there are sectoral, institutional and other anti-corruption programmes. These programmes are developed by state and municipal authorities and non-governmental organizations which are required to develop such programmes in accordance with the National Anti-Corruption Programme and other legislation.

Sectoral anti-corruption programmes, which usually cover several operational activities of state or

municipal authorities, e.g., construction, healthcare, law enforcement, etc., are developed by state or municipal bodies and non-governmental organizations and approved by either the Government or the Parliament.

The responsibility for co-ordination and monitoring of implementation of such programs lies with managers of such entities or their structural units or persons charged with conducting corruption prevention and control in the entity.

b) Monitoring and Evaluation

As was mentioned above, the implementation of the Programme is organised and controlled by the Government with the participation of the STT. The progress achieved by promoters of the Programme and other state and municipal bodies in a specific field is assessed according to the performance targets and their indicators specified in the Programme.

Information about public surveys

Corruption Perceptions Index 2018

The index, which ranks 180 countries and territories by their perceived levels of public sector corruption according to experts and businesspeople, uses a scale of 0 to 100, where 0 is highly corrupt and 100 is very clean.

In 2018 for Lithuania was gave 59 score and took 38 rank among 180 countries. Compared to 2017, CPI result has not changed – Lithuania's rating and global rating have remained stable.

The Lithuanian Map of Corruption 2018

In 2018 December – 2019 January a public opinion and market research center “Vilmorus“ conducted a study “The Lithuanian Map of Corruption 2018“, initiated by the Special Investigation Service of the Republic of Lithuania.

Three target groups were researched: Lithuanian residents, business executives and civil servants. A total of 1,004 residents of Lithuania, 501 business executives, 507 civil servants were surveyed.

The aim of the research – to assess the corruption situation in Lithuania and compare it with results from previous years. The research objectives: to assess the target group approach to corruption, the incidence of corruption in various institutions, to identify corruption practices of the respondents and evaluate the potential of anti-corruption.

Lithuanian residents place corruption on the 4th place among the most acute problems, after low-wage, emigration, rising price. 40 % of the population indicated corruption as a very serious problem. This percentage is lower in comparison with year 2016 (56%,). Business leaders mentioned corruption, as a very serious problem, in the 6th place – 27 % (in 2016 – 35 %) and civil servants – in the 6th place – 30% (in 2016 – 32%). All three groups mentioned corruption less often compared to 2016. Entrepreneurs were also asked about the problems impeding business. Corruption was mentioned in the 11th place following emigration, tax rates, administrative burden.

There is decrease in the population estimates that Lithuania encounters a widespread corruption situation when a political party promises to make useful decisions if an entrepreneur provides financial support (from 36 % in 2016 to 25 % in 2018).

25 % of Lithuanian residents think that the extent of corruption has grown in 5 years, 35% think that it remains unchanged and 25 % think that it has decreased. In 2008, the percentage of those who believe that the extent of corruption within 5 years has increased was 77%, in 2011 – 53 %, in 2014 – 35 %, 2016 – 42 %. Regarding the future, there are slightly more optimists (27 %) than pessimists (14 %).

In an open question about the most corrupt institutions, the residents most frequently mentioned health care institutions (50 %), the Seimas (32 %), the courts (27 %). In many cases, various institutions have been mentioned more frequently. Business leaders and civil servants most frequently mentioned health care institutions (35 % ir 43 % respectively), but also – the Seimas (22 % ir 23 % respectively) and municipalities (22 % ir 29 % respectively).

All data from The Lithuanian Map of Corruption 2018 please see here:
<https://www.stt.lt/lt/menu/tyrimai-ir-analizes/>.

Eurobarometer 2018

Lithuania is one of the country, where majority of respondents (65 %) say they “tend to trust” the EU. In 23 EU Member States, a majority of Europeans, describe the current situation of the European economy as “good”, with the highest scores in Lithuania (73%), Austria (70%) and Poland (70%).

According to Eurobarometer 2017 data, in five of the 28 EU Member States, there has been a decrease since 2013 in the proportion of respondents who think that doing a favour in exchange for getting something from the public administration or a public service is “never acceptable”. Lithuania (+27 pp) has seen significant increases in the proportions of respondents who think this is “never acceptable”. There has been very little change at country level in the proportions of respondents who think that this kind of action is “always acceptable”.

(More information about Eurobarometer 2018 please see here:
<http://ec.europa.eu/commfrontoffice/publicopinion/index.cfm/Survey/getSurveyDetail/instruments/STANDARD/yearFrom/1974/yearTo/2018/surveyKy/2215>)

3. Please describe any lessons learned in the development, evaluation and impact of anti-corruption policies or strategies.

The strategic aim of this long-term anti-corruption programme is to reduce the scope of corruption, to increase transparency, openness in the public and private sectors. Though the majority of the Programme measures are being implemented within the time limits set, the most significant indicators are obtained, greater attention should be devoted to the below specified measures, which:

- would change positively the opinion of the respondents about the Government’s efforts to combat corruption because according to Eurobarometer 2017 survey data, only 18 per cent of the respondents think that these efforts are sufficient.

- would reduce the political impact and nepotism, which were identified as posing a problem to business in Lithuania by 23 per cent of the respondents of the Eurobarometer 2017 survey.

On more insights of STT on corruption situation in Lithuania, please see its annual reports:

<https://www.stt.lt/en/menu/stt-annual-reports/#turinys>

- 4. Do you consider that any technical assistance is required in order to allow you to fully implement this provision? If so, what specific forms of technical assistance would you require?**

No assistance would be required.