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**Accountability Gaps in the Relationship Between  
International Organizations and Civil Society**

A Case Study of the World Bank's COMRURAL Project in  
Honduras

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## Abstract

Projects implemented by international organizations have direct impacts on people's daily lives in the countries where they are executed. Due to this, increasing attention has been given to the accountability mechanisms that international organizations use and the effectiveness of these mechanisms. The following research seeks to expand the knowledge about accountability relationships between international organizations and civil society in recipient countries where projects are implemented. This is done by describing the accountability relationship between an international organization and the members of civil society impacted by one of their projects; more specifically, this paper provides a descriptive case study of the Honduras Rural Competitiveness project (COMRURAL) funded by the World Bank in Honduras.

This study relies on accountability theory to provide an empirical description about the accountability relationship between agents and principals/would-be principals in the COMRURAL project. In order to provide a valid description, the accountability relationship concept is systematized and afterwards operationalized into four dimensions: Transparency, Participation, Evaluation, and Complaint and Response Mechanisms. Data about these four dimensions has been collected through document analysis, interviews and direct observations. An in-depth image about each one of these dimensions is given by addressing how, within each of them, policies were created, their content, how they were implemented, and their degree of accessibility for members of civil society.

After providing an empirical description of the accountability relationship, accountability gaps are identified, and the missing elements from the theoretically perfect accountability relationship are pin pointed. A thorough discussion is presented regarding the identified accountability gaps, some of which are trans-dimensional gaps and other dimension-specific ones. Among them, we can mention the lack of appeal processes, the limited consultation process during policy development, the fusion of mechanisms that deal with transparency, the varying degrees of decision-making influence across civil society members, the lack of accountability mechanisms for indigenous participants, and the limited role civil society has in evaluations. Possible explanations are given for the described situations, but no causal relationship has been tested.

This research has made it possible to demonstrate how a specific accountability gap can impact different members of civil society in varying degrees or in different ways. Additionally, possible theoretical explanations are presented for certain organizational attitudes identified in the agents and principals/would-be principals of the COMRURAL project. These could be studied more deeply in order to establish whether or not they have an impact on accountability relationships.

Ultimately, this work contributes empirical data that can be used to further study the causal factors of why accountability gaps occur, their impacts on civil society, and whether or not these are generalizable to other projects carried out by international organizations.

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## **List of Abbreviations**

APROLAC: Copán's Dairy Producers Association

CAEOL: Western Effort Agricultural Cooperative Limited

COMRURAL: Honduras Rural Competitiveness Project

CONADIMCH: National Coordinator for Maya-Chortí Natives

CONIMCH: Maya-Chortí National Indigenous Council

DR-CAFTA: Dominican Republic and Central America Free Trade Agreement

GAP: Global Accountability Project

IMF: International Monetary Fund

MILH: Indigenous Lenca Movement of Honduras

RPO: Rural Producer Organization

UIA: Union of International Associations

WB: World Bank

INVEST-H: Strategic Investment from Honduras



# Chapter 1. Introduction

In the past decades the number of international organizations in the world has risen exponentially; at the same time, their authority and range of action has been expanding accordingly. This has mainly been a result of globalization, which makes it possible for people to interact daily at an international scale. However, it has also been a result of the emergence of global issues such as climate change, terrorism, financial stability, human rights, sustainable development, etc.

These expansions and the fact that international organizations' actions have a direct impact on people's daily lives, have driven research on the topic. Special attention has been given to the accountability mechanisms that international organizations use and the different set of standards and goals that they have set for them. Because of this, these mechanisms usually vary according to the area of work of the organization.

The following research seeks to generate a deeper understanding regarding accountability shortcomings, such as accountability gaps, that international organizations might encounter when engaging in projects where there is civil society participation. By relying on accountability theory, describing the empirical reality of accountability relationships, and examining the different accountability mechanisms that exist to hold an international organization accountable, it is possible to better comprehend which impacts can be linked to the actions of an international organization, to whom and how responsibility is ascribed, and to what degree accountability gaps hinder the mandates that have been defined for an international organization.

This paper is a descriptive case study and focuses on the Honduras Rural Competitiveness project (COMRURAL) funded by the World Bank in Honduras. The COMRURAL project was approved in 2008 and began its implementation stage in 2009.

The accountability relationship from the COMRURAL project is operationalized into different accountability dimensions and through the description and analysis of the interactions between members of civil society and the officials of the COMRURAL project, it is possible to see how they interact within the accountability relationship and at the same time shape it. The empirical description of the accountability relationship makes it possible to identify the existence of accountability gaps in the project.

## 1.1. Research Objectives

1. To expand the knowledge about accountability relationships between international organizations and civil society in recipient countries where projects are implemented.
2. To accurately describe, through a theoretically operationalized logic, the accountability relationship between an international organization and the members of civil society impacted by one of their projects.
3. To contribute empirical data that can be used to further study the causal factors of why accountability gaps occur and whether or not these are generalizable.

## **1.2. Research Questions**

1. How did the accountability relationship between civil society in Honduras and the World Bank's COMRURAL project officials occur?
2. What elements, from a theoretical accountability relationship, are missing in the accountability relationship between civil society in Honduras and the World Bank's COMRURAL project officials?
3. If accountability gaps are found; what factors or situations originated them?
4. If accountability gaps are found; how did they affect, or not, the members of civil society in Honduras?

## **1.3. Research Expectations**

1. Accountability relationships between international organizations and civil society at a country's national level can suffer from accountability gaps.
2. Different types of accountability gaps can be found within a single accountability relationship when the relationship is analyzed throughout the different implementation stages of a project.
3. Due to civil society being so diverse, the impacts of accountability gaps will not affect members of civil society in the same way.

## **1.4. Importance of the study**

The main difference regarding accountability in a national context and accountability for international organizations, relates to international organizations' nature of diluted responsibility. Papadopoulos (2014), states that this represents a problem because it opens the possibility of "blame-shifting games" since, within multi-level governance structures like international organizations, it is hard to determine who is responsible for what and to what extent. Another problem identified by Papadopoulos (2014) refers to the different levels of action that international organizations engage in, which can mean that they will be subject to different accountholders and sometimes these could be in opposition with one another.

Another aspect worth noting regarding accountability for international organizations also refers to the complexity of the actions taken by international organizations. It is said that "the public sphere that is necessary for accountability is absent from multi-level governance" (Papadopoulos, 2014, p. 6). International organizations' actions are usually so complex that, even if reports are given publicly, accountholders face problems understanding them or lack the motivation to invest the extensive amount of time needed to scrutinize these actions. These inherent characteristics of international organizations raise the need for more detailed empirical studies about accountability mechanisms and relationships under analysis. Consequently, the importance of this study relates to providing an empirical description of the accountability relationship between an international organization and civil society, enabling future research about apparent accountability gaps and their causes.

## **Chapter 2. Context**

### **2.1. The World Bank**

With more than 45.9 billion dollars in financial assistance and over 12,000 projects as of 2019, the World Bank (WB) is one of the largest and most influential development agencies in the world. Its mission is to end extreme poverty and to promote shared prosperity (World Bank, 2019). The huge influence exerted by the WB comes from its expanding areas of work, and the several reform conditions that are usually coupled to its loans: this is what gives the WB a significant capacity to generate social and economic changes within the countries to which it lends (Kovach, Neligan, & Burall, 2003).

Originally founded as a bank to aid European reconstruction after World War II, the bank has changed its scope throughout its history and now focuses on giving support to developing countries. Kovach et al. (2003) state that the significant expansion in the mandate of the bank is a result of “adjustment” lending, which started in the 1980’s. Adjustment lending, they say, has allowed the WB to provide loans for broader structural reforms, different than reconstruction and development projects, such as strengthening the rule of law and financial sector reforms. In line with these reforms, the bank has also started to support projects which cover social issues including education and health programs.

The bank is composed of 189 member countries and has offices in over 130 locations. The member countries are represented by a Board of Governors, which is the body in charge of making the policies at the WB. The Board of Governors meet once a year at the Annual Meeting of the Board of Governors of the World Bank Group and the International Monetary Fund.

The World Bank’s governance structure has been previously criticized due to its shareholder approach for voting. The number of shares that each country holds is based on an IMF formula which reflects the economic strength of each country. The number of shares owned, determine the number of votes. Kovach et al. (2003) show how this system perpetuates inequality within the organization because 11 of the WB’s member countries control over 50% of the votes. Even more concerning is the fact that one single member, the USA, has the power to veto any changes to the institutions founding documents. What this ultimately represents is that “under the present system those most impacted upon by the Bank’s decisions, borrowing member countries, are effectively marginalized from having a real input into its decision-making” (Kovach et al., 2003, p. 13).

### **2.2. Honduras and The World Bank**

Honduras, officially named “Republic of Honduras”, is a country in Central America which shares borders with Guatemala, El Salvador, and Nicaragua. Its capital city is Tegucigalpa (together with Comayagüela). The country acquired its independence from Spain in 1821 and since then it has been a democratic state according to its constitution. Nevertheless, the constitution was completely rewritten 17 times between 1821 and 1982, and political power has often changed hands through violent and undemocratic means such as military coups (Wayne Clegern & Moncada, 2020).

According to the World Bank's information on the country, in recent years Honduras has registered the second highest economic growth rates in Central America and the country possesses strengths which give it the potential for faster growth. However, the country still struggles with high levels of inequality with 48.3 of its population living in poverty. In addition to this, the high levels of violence, over 41 homicides per 100,000 inhabitants in 2017, have caused mass migration within its population (World Bank, 2020).

Honduras acquired membership in the World Bank on December 27, 1945. From 1994 to 2004, external assistance averaged 9 percent of Gross National Income and the World Bank has always been a major contributor. In November 2006 a new Country Assistance Strategy for Honduras for the fiscal years 2007-2010 was presented by the World Bank. This new Country Assistance Strategy was aligned to the country's "Poverty Reduction Strategy" which was, at that time, being updated by the administration of President José Manuel Zelaya Rosales. Under this new Country Assistance Strategy, four pillars were established: Equitable Economic Growth for Employment Generation, Good Governance through State Modernization and Civic Participation, Environmental Protection and Risk Management, and Development of Human Capital. It was under this strategy that this study's project was conceived, and its activities could be categorized under the first of these pillars (World Bank, 2006).

The Country Assistance Strategy identified a positive trend in Honduras governance and democracy. One year before its publication, the country had celebrated its seventh consecutive election. It looked as though a successful transition from authoritarian military regimes to a pluralistic democracy was on its way. However, it also acknowledged fragile state institutions and stated that corruption was identified as the most important constraint on growth.

Under the economic development pillar of the Country Assistance Strategy, it was stated that Honduras was a lower middle-income country with a poor record of growth. Regarding poverty, the country had reported little progress in poverty reduction and inequality had not been addressed in those years. Around 68 percent of the extreme poor lived in rural areas and it was reported that poverty was acute in both rural areas and among indigenous groups. Both these groups shared one characteristic: they were mainly engaged in agricultural activity. The strategy reported that in 2004, around 81 percent of the heads of extremely poor households were engaged in agriculture (World Bank, 2006).

Lastly, it should also be noted that in the World Bank's Country Profile for Honduras in 2010 several obstacles were identified within the country. The Country Profiles are produced by the Enterprise Analysis Unit of the World Bank and provide an overview of key business environment indicators. Due to the nature of this study's projects, the business environment indicators can also be considered as relevant contextual factors. The two major obstacles identified by the World Bank in the aforementioned document were political instability and corruption (World Bank, 2011). This is not surprising in light of the political events that occurred between the publication of the Country Assistance Strategy and the Country Profile for Honduras. Namely, the military coup against President José Manuel Zelaya Rosales on the 28<sup>th</sup> of June of 2009.

It is under this context, and as part of its efforts for promoting growth in Honduras, that the World Bank has funded the Rural Competitiveness Project (COMRURAL). The project has “contributed to increase productivity, competitiveness, and markets linkages among 7,200 small-scale rural producers of coffee, dairy, honey and other products in Honduras”. Additionally, it has leveraged around twelve and a half million dollars from private financial institutions as co-financing funds for agricultural projects from small-scale farmers; increasing financial inclusion and creditworthiness for them. The World Bank argues that another result of this project is that it has contributed in making agricultural value chains more competitive and consequentially there has been an increase in sales for rural producers (World Bank, 2020).

### **2.3. Honduras Rural Competitiveness Project: COMRURAL**

The Honduras Rural Competitiveness Project (COMRURAL) is a project funded by the World Bank in Honduras under the responsibility of the Honduran Ministry of Agriculture and Livestock (SAG). According to the World Bank’s projects database, the project was approved on June 17, 2008 and is set to be closed on November 30, 2020. Originally it had been set to close on November 20, 2015 but it was extended on May 18, 2017 (World Bank, n.d.).

According to the World Bank’s project appraisal document the project development objective of COMRURAL is to “contribute to increased productivity and competitiveness among organized rural small-scale producers through their participation in productive alliances” (World Bank, 2008, p. 8).

The project was a response to the launching of the Dominican Republic and Central America Free Trade Agreement (DR-CAFTA) which started in 2008. The signing of that agreement meant that rural producers of Honduras were going to have greater access to foreign markets. However, they would simultaneously be subject to vulnerability due to increased competition from those markets.

For rural producers to benefit from this agreement, the government of Honduras sought out support from the World Bank in order to implement the COMRURAL project. The project was in line with the government’s Operational and Strategic Plan of Agriculture Sector 2006-2010 which established the following objectives:

- Increased production, productivity and human resources development among small-scale producers;
- Integration and development of agricultural value chains;
- Qualitative progress in terms of competitiveness vis-à-vis DR-CAFTA;
- Development and strengthening of producer organizations (including those in indigenous areas); and
- Improved well-being of the rural population (World Bank, 2008, p. 11).

The same project appraisal document defines seven western departments of Honduras as target areas for the implementation of COMRURAL. The departments of Comayagua, Copán, Intibucá, La Paz, Lempira, Ocotepeque, and Santa Bárbara were selected using criteria of:

(I) productive potential, (II) access to road and potential markets; (III) presence of a network of value chains that could be rapidly leveraged towards the competitiveness goal of the project; (IV) extant social capital that could be further exploited to install participatory decision-making and monitoring and evaluation; and (V) ongoing initiatives that could complement the proposed operation (p. 15).



Figure 1. Map of Honduras showing the seven departments targeted by the COMRURAL project. The western departments of Comayagua, Copán, Intibucá, La Paz, Lempira, Ocotepeque, and Santa Bárbara appear greyed out.

Within these departments the project aimed to support “rural agricultural and non-agricultural small-scale producers, organized in associations, cooperatives, unions or any other form of representative organization of civil society, with legal standings or in the process to acquire legalized status” (World Bank, 2008, p. 16). The goal was to reach around 6,700 small-scale producers, or around 17.6 percent of the small-scale producers in the seven targeted western departments.

Therefore, one of the project’s main goals is to promote small farmer participation in civil society associations and, through these associations, incorporate them into *productive alliances*. As defined in the project’s appraisal document a productive alliance is the “mechanism through which producers with potential can participate in value chains that will help them improve their productivity by giving them better and more equitable access to markets, technologies, and organizations” (World Bank, 2008, p. 33). Productive alliances would be evaluated and supported upon the presentation of a detailed *business plan*, which is, according to the same document, an

instrument established as a mean to promote a “culture of formally-established business with contractual obligations”. This instrument is something considered atypical, but needed, in the Honduran rural sector.

Lastly, the project appraisal document states that the COMRURAL project will be separated in three different “components” for its implementation. This are:

- Component 1: “Support to Productive Alliances”, which entails a wide range of pre-investment activities aimed at promoting the project and reaching out to rural producers’ organizations (RPOs), commercial partners, and private financing entities. This component also includes creating productive alliances between RPOs and commercial partners, identifying potential business opportunities, and preparing business plans. The actors involved in these actions would have access to technical assistance to ensure viable business plans and sound productive alliances.
- Component 2: “Productive Investments”, which entails the provision of sub-project grants to co-finance the implementation of those business plans created through Component 1 and deemed as viable. For a business plan to be considered viable this must be financially feasible, be part of a concrete productive alliance, and have secured up-front resources from the private financial sector to support the business plan.
- Component 3: “Project Coordination, Monitoring and Evaluation, this last component entails the costs associated with the project administration and the setting up, and running, of a participatory monitoring and evaluation system. It is through this component that information should be collected for both the mid-term and the final evaluation.

This study analyzes the accountability relationship of the COMRURAL project as a whole and therefore refers to experiences that took place across all three components.

## **Chapter 3. Theoretical Framework**

### **3.1. Concepts**

#### **International Organization**

International organizations can vary widely in member size, geographical scope, purposes and number of tasks given to them. For this research, an international organization is an “institution drawing membership from at least three states, having activities in several states, and whose members are held together by a formal agreement” (Mingst, 2016).

To further narrow the conceptual boundaries of this research, I refer to the work done by the Union of International Associations (UIA) regarding categories of international organizations. The UIA was founded in 1907 under the name of “Central Office of International Associations”, and according to their website one of its main purposes is “to maintain and provide comprehensive, up-to-date, and reliable information on international associations, their activities and concerns, and

their meetings activities”. The UIA defines the characteristics that make up the conventional categories of international organizations. Based on these, every time the term *international organization* is used in the present work, it should be understood as organizations that fall under the label of inter-governmental organizations. This means that such organizations fulfill the following characteristics specified by the UIA’s Yearbook of International Organizations (“Types of International Organization,” 1978):

1. They are based on a formal instrument of agreement between the governments of nation states.
2. They include three or more nation states as parties to the agreement.
3. They possess a permanent secretariat performing ongoing tasks.

It is also useful to note, that within social science we can find two theoretical approaches to study international organizations. Barnett and Finnemore (1999) distinguish between an economic approach based on notions of instrumental rationality and efficiency. International organizations are created by states to further their own interests and serve as a structure to reduce market imperfections such as incomplete information or contracting problems. A sociological point of view follows a second approach that focuses on notions of legitimacy and power. This field makes no “starting assumptions” but rather questions the efficiency of international organizations and treats their actions as social facts. This means that international organizations can take actions that contradict what they originally stated as their purpose. From this second point of view, some international organizations exist only because they have a symbolic value in society, even though their actions could be inefficient, obsolete, or unnecessary. The distinctions between these two approaches must be kept in mind because the lenses used for any research concerning international organizations will usually be built upon the previously mentioned assumptions. For this work I will build upon the second assumption, which grants autonomy to international organizations in their decision-making processes, instead of considering them as mere tools utilized by nation states.

### **Accountability**

The second conceptual clarification needed for this paper concerns the term accountability. Before discussing the existing definitions for accountability, one must note the hurdles encountered due to its nature as an essentially contested concept. When we refer to essentially contested concepts, we are talking about concepts that have no consensus across academia and society regarding its “correct use” or “correct definition”. This means that some concepts involve, inevitably, endless disputes which are genuine and sustained by respectable arguments and evidence (Gallie, 1955).

Therefore, it is easy to note that even though accountability is a widely used term in academia and politics, it does not have a specific concept agreed by all members of society. What does exist, is a general and abstract notion of accountability as a good value, desired and praised in public servants and organizations. With this in mind, the first step to clarify this term is to select a starting point that narrows down the initial notion regarding accountability is. Bovens (2007) provides a



starting point by defining accountability as a “relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his or her conduct, the forum can pose questions and pass judgement, and the actor may face consequences” (Bovens, 2007, p. 45). To complement this, by using Keohane (2011) work on accountability, it is possible to clarify that the so called *actor* in Boven’s definition is the equivalent to the *agent* found in the principal-agent theory; and the so called *forum* is made up by two different individuals which would be the *principals and would-be principals* found in the same theory. Therefore, for this study, an accountability relationship is defined as *the relationship between an agent and principals/would-be principals, in which (I) the agent has an obligation to explain and to justify his or her conduct; (II) principals/would-be principals can pose questions and pass judgement; and (III) the agent may face consequences based on those judgements.*

A detailed explanation regarding the differences between principals and would-be principals is given in a following section which addresses the different categories within accountability.

Additionally, throughout this study, the term accountability gaps is defined as *situations in which individuals or entities cannot demand the accountability that they deserve, or think they deserve, because the accountability mechanisms in place are inefficient or nonexistent* (Keohane, 2011). In contrast, accountability overloads, is defined as *situations in which accountability mechanisms are counterproductive or excessive and therefore harm an organization’s activities.* As stated by Bovens, Schillemans, and Hart (2008), an accountability overload overwhelms an organization because of the time spent trying to keep up with accountability demands. It brings “little gains to the public interest and adds ever more red tape” (Bovens et al., 2008, p. 228).

Lastly, when referring to accountability mechanisms it should be understood as *a procedure or agency which has been assigned the duty of ensuring that decision-making arenas (I) are open to those affected by them, (II) provide an opportunity for citizens to question the actions of government or international organization officials, and (III) give the opportunity to correct or change the course of action of an organization if the citizens believe that a change should happen.* These mechanisms are rational means and procedures to ensure that the actions carried out by an organization are in line with the interests of the citizens impacted by them.

## **Civil Society**

When using the term “civil society” similar issues to the ones found with the term accountability are encountered. This is because, the term civil society has long been a contested concept with a wide range of theories and academics giving it different meanings depending on the context in which it is used. Also, as the living concept that it is, “civil society” as a term has evolved throughout time and continues to evolve today.

Scholte (2011) defines new boundaries for what “civil society” is by analyzing the four main contemporary usages of the term in academia. Relevant to this research is the notion of “public sphere” used by Habermas (1989), which sets the basis to consider civil society as any political space in which citizens are able to deliberate on the current and future situations of their collective life. Also relevant, is the work made by Tocqueville (1835) which treats civil society as the sum

total of associational life within a given human collectivity. These two definitions lay out some basic boundaries for the term civil society as all kind of non-official, and usually non-profit, organizations outside of the family. Nevertheless, it is too general and abstract, and therefore needs to be furtherly restricted for an empirical research project like the one at hand.

Because of this, Scholte (2011) makes an effort to further restrict the previous concepts and defines civil society as a “political space where associations of citizens seek, outside of political parties, to shape societal rules” (Scholte, 2011, p. 34). The author uses this definition to portray civil society as an enactment of citizenship, meaning all the actions through which people will claim their own rights while at the same time fulfilling their own obligations as members of a society. Scholte (2011) also portrays these actions as something that happens collectively because citizens must assemble in groups, sharing a similar concern, and mobilize around a particular issue or goal.

These three definitions constitute the basis for the concept of civil society to be used in this research: *a civil space, independent from political parties, through which groups of citizens seek to achieve shared goals such as changes in societal rules, communal development, or economic benefits*. This definition better describes the actors from the COMRURAL project which are rural producers engaging in civil society associations to establish productive alliances which generate an economic benefit for their members and promotes local development.

It is worth noting that international organizations usually favor more restrictive concepts of civil society when developing their accountability policies or policies overall. More specifically, they usually refer to civil society as the aggregate of non-governmental organizations (NGOs) in a country; this NGO-centered concept only entails nonprofit organizations that have been legally registered, professionally staffed, and that have a clear advocacy goal. An explanation for this trend could be that bureaucracies find it easier to interact, and work, with other bureaucracies. Nevertheless, civil society interaction with international organizations, more often than not, occur outside of the boundaries of these so-called NGOs. Consequentially, using a similar concept would not fit the empirical reality of the project being studied here.

### **3.2. Accountability and International Organizations**

Having clarified the conceptual background for this research, it is possible now to develop the groundwork for these concepts to relate to each other. In a world driven by globalization, the impacts of international organizations’ actions on people’s daily lives are an ever-increasing phenomenon. These impacts occur because of the ability of international organizations to promote new ideas, set goals and policies, and in some cases even approve policies or treaties which overrun domestic laws. Such abilities and the situations that emerge from them have raised the idea that international organizations should also be held accountable for their actions. Civil society has used these same situations as a justification to advocate for accountability mechanisms that limit the actions and outcomes caused by international organizations, in an attempt to protect the actors involved in projects developed by them.

Scholte (2011) argues that the main problem with the accountability of international organizations has been the lack of direct mechanisms that impacted people have to demand accountability from

international organizations. He argues that unlike nation-state governments, international organizations vary in the way they elect their boards (e.g. the undemocratically elected board of the WB). They also lack traditional accountability mechanisms like the ones used legislative or judicial branches against the executive, through a range of checks and balances such as the division of powers.

Hence, the accountability of international organizations has traditionally being limited to the demands of member states from each organization, in representation of their citizens. Scholte (2011), explains that this indirect method of accountability has proven highly ineffective in recent years for the following reasons:

1. The unequal power between international organizations and member states which prevents smaller states from holding international organizations accountable;
2. The unwillingness of strong states to demand accountability reforms from international organizations;
3. Judicial immunities given to international organizations officials;
4. The disconnection between international organizations unelected technocrats and the affected population in their countries;
5. The existence of international organizations such as the G8 which have far reaching impact on the world but whose membership is limited to a few states;
6. The fact that non-state actors have now started to directly engage with, and use, international organizations to demand accountability to their own member states: reversing the accountability claims;
7. And lastly, the fact that modern political identities are being formed outside of the concept of nation-state (diasporas and indigenous groups for example) (Scholte, 2011).

Scholte (2011) concludes that it is this lack of direct accountability mechanisms and the ineffectiveness of indirect accountability through states, what has hindered the effectiveness and legitimacy of international organizations and have ultimately led to unfulfilled goals which result in an increase of global societal problems such as poverty and inequality.

These arguments are the justification to enquire, through a descriptive study, what are the empirical characteristics of the accountability relationships between civil society and international organizations.

### **3.3. Why is accountability important?**

To understand the importance of accountability, beyond the notions of responsibility and transparency, one must look into the positive outcomes that accountability mechanisms can generate for any organization.

While developing a new assessment tool for accountability arrangements, Bovens et al. (2008) distinguished three main recurring answers regarding the importance of accountability in both academic literature and policy documents. The first concerns (I) democratic control and refers to the chain of principal-agent interactions that are found within public administration in which

principals monitor the agent's actions and call them to account when needed. The importance of this chain is highlighted by the fact that organizations usually delegate tasks at the moment of implementing policies. At the very beginning of the chain we should always be able to find the citizens and the "sanctions" they impose through ballot boxes. Secondly, (II) accountability is important because it can prevent corruption and abuse of power. This is because accountability enables the possibility of preventing, uncovering, and punishing deviating behavior from public officials. Lastly, (III) accountability can enhance government effectiveness through experiential learning. This refers to the pressure generated by accountability which pushes officials and institutions to deliver the expected results and to listen to the feedback given about their performance. It also serves external actors in similar positions because they can learn from others' experience if they have been called to account publicly. Furthermore, Bovens (2010) also argues that accountability is a good mechanism to generate reflection which, as previously mentioned, leads to experiential learning. Therefore, accountability is needed within international organizations to guide them towards better practices.

Scholte (2011), states that another argument to hold international organizations accountable is that accountability is a "must have" for effectiveness and legitimacy. Organizations and regimes that lack accountability mechanisms usually fail to achieve their purposes. Because of the lack of feedback required to improve, they become ineffective. Also, organizations and regimes that do not have accountability mechanisms usually struggle securing support from the population they work with; they become illegitimate. Hence, accountability is of great importance for international organizations if they want to fulfill their goals.

Nevertheless, the balance between sufficient accountability mechanisms for democratic control, prevention of power abuse, and experiential learning versus the threat of a self-defeating bureaucracy obsessed with rules is very thin. That is why acknowledging the existence of accountability gaps or overloads, to precisely fix them, is a topic of high importance.

### **3.4. Categories of Accountability**

Different answers can be given to the question "Who should international organizations be held accountable to?" Some people might consider that international organizations should only be accountable to the normative philosophy enclosed in their constitutive documents. Others might argue that international organizations should be accountable to their own member states through their governments. Finally, others could argue that international organizations are to be held accountable directly by any citizen of the countries in which they are acting.

Before dissecting these different points of view, the fundamentals of an accountability relationship must be clarified. When can a relationship between actors be considered an accountability relationship? According to Bovens (2010), three stages must exist in an accountability relationship for it to be considered legitimate and efficient. First, agents must have at least a feeling of being obligated to inform the principals/would-be principals about their conduct. Second, the principals/would-be principals must be able to question the actions realized by the actor. And lastly, the principals/would-be principals must have the ability to judge the agent, and the agent

may face consequences if they deem it necessary. In an accountability relationship, principals/would-be principals can be both individuals and organizations.

If an accountability relationship's empirical reality does not fit perfectly into one of these three stages, it does not mean that the accountability relationship should not exist, or that it should be disregarded, rather, it points towards the possible existence of accountability gaps that are hindering the relationship.

Concerning the first stage, Keohane (2011) builds upon three justifications for an organization to be obliged, or feel obliged, to some kind of accountability from someone else (informing them about their conduct). He argues that if any of these justifications are present in an organization, then the possibility of being held accountable should exist. These justifications are:

- 1. Authorization:** If an entity, or individual, authorizes another to act on their behalf they will be conferring rights and obligations between them and can therefore be held accountable on such basis.
- 2. Support:** This refers to financial or political support. Those giving support should have enough opportunities to hold the ones receiving support accountable for their actions.
- 3. Impact:** This is the broader of the three and entails that any individual or entity affected by the actions of others should be able to hold them accountable for the impacts they have brought upon them.

The first two justifications presuppose the existence of an official link between actors and therefore constitutes the category of *internal accountability*. This means, accountability is exercised between actors inside the organization. On the other hand, the last justification concerns people outside of the organization, affected by the organization's externalities, and therefore constitutes the category of *external accountability*.

### **Internal Accountability**

Internal accountability entails mechanisms within international organizations that serve to restrain the organization's action and evaluate their impacts. In line with Keohane's previous justifications, Reinisch (2001) argues that international organizations can be held accountable by their member states (I) by limiting the amount of power they give to them when they are created (this would entitle their degree of authorization) or (II) by giving or denying financial and political contributions (this would entitle their degree of support). Keohane (2011) states that internal accountability relationships exist because principals provide legitimacy (through authorization) or financial and political resources (through support) to the agent; consequentially, there is an institutional link between principals and agent.

It is worth pointing out, from a theoretical stance, the most common hurdles identified within this category. Firstly, international organizations are always internally accountable to their members states, because they depend on their authorization to be created and on their support to keep existing. Nevertheless, internal accountability to these states is usually constrained by power

asymmetries. This means that only a few powerful states or big donor states are able to fully demand accountability to international organizations through mechanisms of internal accountability. This represents a commonly identified gap in internal accountability: because power is unevenly distributed within many international organizations, small states can be denied accountability due to decisions made by more powerful states.

Secondly, mechanisms of internal accountability rely entirely on mutual control from member states and a sense of “distrust”. Nevertheless, there is no way to hold states accountable if they cooperate together to “use an international organization as a vehicle to carry out activities that they themselves may be prevented from engaging in” (Reinisch, 2001, p. 134). This means that some states may use international organizations to perform actions that might be forbidden to them or are viewed negatively by other states by exploiting the immunity or exemptions that international organizations have.

As stated by Keohane (2011), theories and studies of both authorization and support account for most of the existing literature regarding the accountability of international organizations. Civil Society relationships with the World Bank fall outside of this category. Hence, this category is presented here just to bound the present case outside of these dimensions.

### **External Accountability**

In order to understand which actors, make up the external accountability category, it is useful to borrow a concept from economic theories: externalities. Externalities, in economic theory, refer to the costs or benefits generated by a business, which affect other actors that did not choose to pursue such costs or benefits. Broadly speaking, this means that the actors are outside of the acting organization and did not take part in the decision-making or implementation of such actions. Concerning international organizations, this allows for the claim that whoever is affected by an action carried out by an international organization should be entitled to some form of accountability.

Keohane (2011) acknowledges that external accountability entails the biggest normative problem among accountability relationships. This is due to the thin lines found when asking: when is an action considerable enough for someone to demand accountability? This thin line has two dimensions: first, the unfairness of someone being affected by an international organization and not being able to demand any kind of accountability; and second, the inefficiency of having so many consultations and veto points in order to be held accountable externally, which would result in international organizations never being able to implement any actions.

In this regard, the World Bank and its structural adjustment programs have, for several years, been a hot topic regarding who is to be held accountable for the outcomes of such programs. Thousands of people are affected by them. Farmers, small-business and employees could prosper or suffer as a consequence of the implementation of World Bank policies in a specific country.

An example of such situations can be found when looking at Nepal’s implementation of structural adjustment programs prescribed by the World Bank in the aftermath of the balance-of-payment

crisis that occurred in 1985. As explained by Bhurtel (2019), the World Bank's prescription demanded that the government stop all type of subsidies that were being given to the agricultural sector and instead recommended the government to give more focus to the service and industrial sectors. The outcome was the exact opposite of the World Bank's predictions. The industrial sectors stalled and the agricultural sector declined. At the same time, other countries like China and India took advantage of this and, by giving subsidies to their own agricultural sectors, greatly increased their capacity to replace Nepal's production deficits. Before the removal of the subsidies, Nepal was a big exporter of agricultural products but without subsidies it became impossible for the population to compete with the high foreign productivity and high material costs. Such actions resulted in a decline in exports for Nepal. Twenty-six years later, in its World Development Report of 2008, the World Bank made a new suggestion: the government should again give subsidies to the agricultural sector. For a country like Nepal, which has made clear for several decades that agriculture is the main foundation of their economy, it would seem logical to hold accountable those responsible for the collapse of its already small, agricultural sector. Nevertheless, the World Bank has not admitted any fault regarding their failed policies, and Nepalese agriculturists cannot demand any retribution for the outcomes that resulted from the World Bank's structural adjustment programs which collapsed their productivity. Instead, the World Bank has avoided the mutual accountability commitments they signed with the Nepalese government (Bhurtel, 2019). Because, the Nepalese farmers fall under the third accountability justification presented by Keohane (2011), *impact*, it is possible to argue that an accountability mechanism through which they could express their concerns should have existed.

The previous example aids in shining a light on one of the biggest concerns regarding external accountability gaps. Namely, the challenges that emerge due to international organizations' actions which impact citizens that fall under the category of *would-be principals*. Keohane (2011) defines would-be principals as those *actors seeking to hold someone else accountable but lacking any kind of institutionalized relationship*; just like what we see with the example between the Nepali farmers and the World Bank. Ultimately, would-be principals of international organizations are usually more vulnerable and lack any kind of political pressure or economic means to demand the creation of an institutionalized accountability link. This raises great concern, because civil society actors will usually fall under the category of would-be principals. It is in this particular category that the present research will focus.

In current academic literature, when discussing inter-governmental organizations like the WB, there is a common notion that the accountability of international organizations is inadequate in practice because it is heavily tilted towards the demands of powerful stakeholders and more restricted for external actors such as would-be principals. Consequently, it becomes relevant and novel to assess the accountability relationship between an international organization and those directly benefiting from or affected by it. By describing their accountability relationship, it will be possible to identify the existence or nonexistence of accountability gaps that might be affecting them. Such information can be utilized to further improve accountability mechanisms or as a groundwork for future research that could investigate further into the causal roots of their emergence.

### 3.5. The Global Accountability Project Framework

In order to describe the accountability relationship between the COMRURAL project officials and members of civil society in Honduras, a more practical operationalization of the previously defined concept be detailed. The Global Accountability Project Framework (GAP Framework) provides a starting point to operationalize and evaluate accountability relationships. The framework identifies four core dimensions that help organizations become more accountable to their principals/would-be principals. These are: (I) transparency, (II) participation, (III) evaluation, and (IV) complaint and response mechanisms. These dimensions can be evaluated at all stages of decision-making and implementation and, at the same time, are valid for both actors of internal and external accountability relationships (Blagescu, Casas, & Lloyd, 2005).

The characteristics that make up an accountability relationship have already been defined. The GAP Framework's logic is linked to the aforementioned definition because it is expected that the elements found across these four dimensions will act as a catalyst for an accountability relationship to be a relationship between an agent and principals/would-be principals, in which *(I) the agent has an obligation to explain and to justify his or her conduct; (II) principals/would-be principals can pose questions and pass judgement; and (III) the agent may face consequences based on those judgements.*

Meaning, if transparency, participation, evaluation, and complaint and response mechanisms are found in the empirical reality of an accountability relationship, it can be expected that the three-fold characteristics that define an accountability relationship will also be a reality.

Blagescu et al. (2005) elaborate in the GAP Framework what each of these dimensions entail:

1. **Transparency:** this refers to the openness that an organization has about its activities to the general public. This entails information about *what* it is doing, *where* and *how* it is doing it, and the *impact* it is having. The most important reason to have transparency when it comes to accountability is that without it, actors are not able to make informed decisions and choices. Without information it would be difficult for external actors to participate in any decision-making or implementation process.
2. **Participation:** for an organization to be accountable, it needs to understand what the needs of the people it is affecting are. Without mechanisms for external actors to participate in the decision-making processes, these needs will hardly be communicated to the organization. The authors note on this dimension that participation in operational issues is not enough; actors must also be able to participate in issues concerning broader organizational policies. Lastly, participation must have a real opportunity of achieving change. This means that participatory mechanisms must have a real degree of power within the organization.
3. **Evaluation:** the importance of this dimension is that it allows us to assess whether or not an organization is achieving its goals and objectives or if it is meeting the standards that it has set for itself. This dimension allows organizations to properly communicate to its principals/would-be principals what it has achieved but it also allows principals/would-be principals to make demands for those actions that should have been achieved and have not materialized. This dimension is the most essential for experiential learning. The results of



evaluation processes allow an organization to improve its future performance and make it more accountable to its own goals and objectives.

4. **Complaint and response mechanisms:** this dimension allows principals/would-be principals to demand and receive retribution for grievances or harms caused by the organization’s actions. If there is sufficient transparency, participation, and evaluation, there should be less of a need for this dimension. Nevertheless, this “last resort” for principals/would-be principals should be in place in order to make organizations aware of the issues that require response.

Each of these dimensions are essential for an efficient accountability relationship, but at the same time none of them by themselves is sufficient. Meaningful accountability will only be possible in those cases where all of the dimensions are taken care of and balanced. Therefore, even though specific dimensions have been mentioned as effective ways of achieving the theoretical premises found in the three characteristics that make up the definition of accountability relationship, this does not mean that they exclude each other. On the contrary: effective transparency, participation, evaluation, and complaint and response mechanisms are dimensions that contribute, to varying degrees, to the feeling of obligation that agents have when having to explain their conduct; the ability of principals/would-be principals to pose questions and pass judgement; and the ability to materialize consequences based on those judgements.

By analyzing these dimensions, the accountability relationship between Civil Society and the COMRURAL project can be unraveled and accountability gaps can be identified. The operationalization of each of these dimensions is explained in the next chapter.

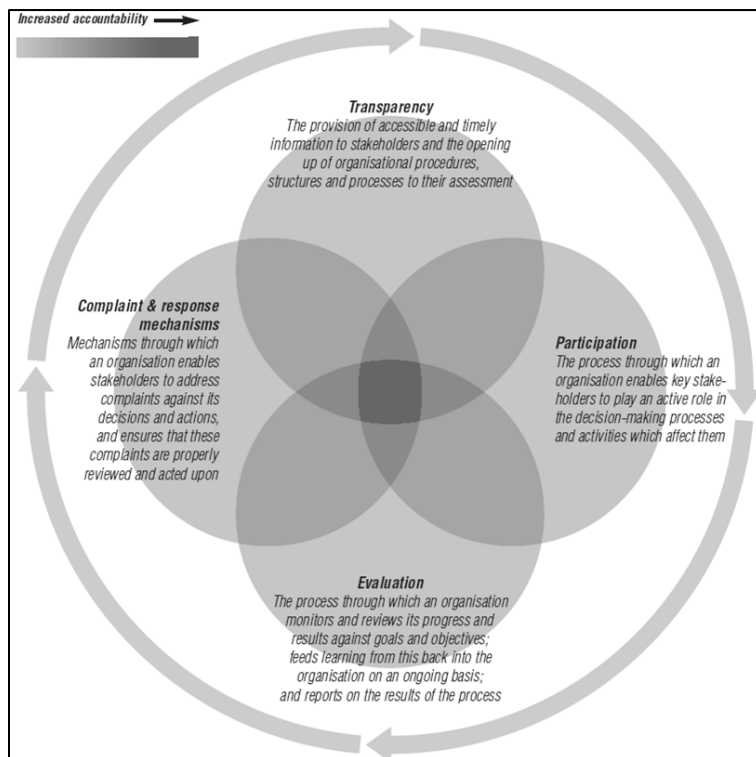


Figure 2. “Accountability Web” diagram designed by Blagescu et al. (2005) to demonstrate how each dimension of accountability is strengthened through interactions with each other. This web demonstrates that accountability is composed out of “mutually reinforcing linkages” (Blagescu et al., 2005, p. 25).

### 3.6. Accountability Operationalization

The following operationalization is entirely based off the work made by Blagescu et al. (2005). In their work, the authors created a comprehensive framework for assessing the accountability of international organizations at a global scale. Such a framework is too broad to assess specific projects developed by international organizations; therefore, the framework has been modified for this study based on two criteria: (I) to evaluate the most fundamental aspects of each accountability dimension, and (II) the empirical reality of the COMRURAL project.

By narrowing down the guidelines and indicators given by the GAP framework it is possible to assess, in the COMRURAL project, the previously mentioned accountability dimensions (transparency, participation, evaluation, and complaint and response mechanisms) across four different elements: (I) policy development, (II) policy content, (III) implementation and (IV) accessibility.

Below, Figure 3 provides a summary of the operationalization of accountability used in this research. The figure presents the Accountability Dimensions and their respective elements as presented in the GAP framework and used to describe the accountability relationship between the officials of the COMRURAL project and the members of civil society in Honduras. A detailed explanation of the operationalization and what is enclosed in each of its elements is given immediately after.

Accountability Operationalization				
Accountability Dimensions				
	Transparency	Participation	Evaluation	Complaint and Response Mechanisms
Elements	Policy Development	Policy Development	Policy Development	Policy Development
	Policy Content	Policy Content	Policy Content	Policy Content
	Implementation	Implementation	Implementation	Implementation
	Accesibility	Accesibility	Accesibility	Accesibility

Figure 3. Visual representation of the four accountability dimensions and the elements found within each one of them. Notice how the “Policy Development” element is dotted because, due to practical reasons, it had to be analyzed across all dimensions at once.

#### The Policy Development Element

Before addressing how the elements of policy content, implementation, and accessibility will be operationalized in each dimension of accountability, it is useful to note that the “Policy Development” element had to be assessed separately for practical reasons.

The empirical reality of COMRURAL showed that the policy documents that regulate all four of the accountability dimensions, were created simultaneously and through the same procedures.

Therefore, this element is assessed as a whole, across all dimensions, and not individually for each dimension. The assessment regarding this first element entails whether or not the policies that regulate the four dimensions of accountability for the COMRURAL project were developed through consultation with relevant principals or would-be principals and if such policies accurately reflect their needs. Furthermore, looking at policy development first aids in shining a light on the historical development of the policy papers that shape COMRURAL's accountability dimensions.

Therefore, the "Policy Development of Transparency, Participation, Evaluation, and Complaint and Response Mechanism policies in the COMRURAL project" is understood in this study as the empirical reality related to experiences, such as:

- Did project officials make an effort to develop their policy and project documents through consultations with relevant principals and would-be principals?

### **Transparency Dimension**

"Transparency", as a dimension of accountability in a specific project, is operationalized in this study and understood as the empirical reality concerning the **(I) Policy Content** related to transparency:

- Does the project have rules related to access to information?
- Is there a clear statement regarding which information is regarded as confidential, and why it is considered as such?
- Does the project provide a clear description of the information disclosure process? This includes: How to make an information request, timeframes, details of how the response will be made, and costs of obtaining the information.

The **(II) Implementation** of the policies related to transparency:

- Is there an official responsible for supervising the implementation of the transparency policy at all levels of the project?
- Is there a system of incentives and sanctions for employees to ensure compliance with the policy on transparency?
- Is there an appeal process for those situations in which principals/would-be principals feel they have wrongly been denied access to information?

And the **(III) Accessibility** that principals/would-be principals experience in relation to transparency policies:

- Is information about the project's transparency policy, project details, and the process for filing an information request easily available to principals/would-be principals in appropriate form and through appropriate media?
- Is the process for filing an information request easily understandable by principals/would-be principals?
- Are principals/would-be principals prevented from accessing information due to financial or technical constraints?

### **Participation Dimension**

“Participation”, as a dimension of accountability in a specific project, is operationalized in this study and understood as the empirical reality concerning the **(I) Policy Content** related to participation:

- Does the project have rules related to principals/would-be principals engagement and their role in participatory processes of decision-making?
- Does the project stipulate how will the outcomes of participatory processes with principals/would-be principals affect decisions and translate into practice?
- Are principals/would-be principals able to initiate engagement with the project officials?
- Does the project stipulate how to decide which principals/would-be principals groups are involved in the decision-making process? What are the reasons for selecting certain groups over others? And how are the representatives of such groups selected?

The **(II) Implementation** of the policies related to participation:

- Is there an official responsible for supervising the implementation of the participation policy at all levels of the project?
- Is there a system of incentives and sanctions for employees to ensure compliance with the participation policy?
- Is there an appeal process for those situations in which principals/would-be principals feel they have wrongly been denied participation?

And the **(III) Accessibility** that principals/would-be principals experience in relation to participation policies:

- Is information about the project's participatory mechanism easily available to principals/would-be principals in appropriate form and through appropriate media?
- Does participation take place prior, during, and after the decision-making process?
- Are principals/would-be principals prevented from engaging in participatory processes due to technical or financial constraints?

### **Evaluation Dimension**

“Evaluation”, as a dimension of accountability in a specific project, is operationalized in this study and understood as the empirical reality concerning the **(I) Policy Content** related to evaluations:

- Does the project have rules regarding the evaluation of activities?
- Are the objectives of the evaluations communicated clearly?
- Is the information from evaluations communicated to both principals/would-be principals and to project officials?
- Are principals/would-be principals involved in the evaluation process?

The **(II) Implementation** of the policies related to evaluations:

- Is there an official responsible for supervising the evaluation processes at all levels of the project?
- Is there a system of incentives and sanctions for employees to ensure compliance with the evaluation policy?
- Is there an appeal process for those situations in which principals/would-be principals feel they have wrongly been denied input to the evaluation process?

And the **(III) Accessibility** that principals/would-be principals experience in relation to evaluation policies:

- Is information about the project's evaluation policy, evaluation engagement, and evaluation results easily available to principals/would-be principals in appropriate form and through appropriate media?
- Are evaluation reports made publicly available?
- Are principals/would-be principals prevented from participation in evaluation processes due to technical or financial constraints?

### **Complaint and Response Mechanisms Dimension**

“Complaint and Response Mechanisms”, as a dimension of accountability in a specific project, is operationalized in this study and understood as the empirical reality concerning the **(I) Policy Content** related to complaint and response mechanisms:

- Does the project have rules regarding receiving, investigating and responding to complaints from principals/would-be principals?
- Can complaints be filed in relations to any stage of an activity?
- Does the project provide a clear description of the complaint process? This includes: How to file a complaint, investigation, judgement, implementation of response and corrective action.
- Can complaints be kept confidential if needed? Is there a non-retaliation policy towards complaints?

The **(II) Implementation** of the policies related to complaint and response mechanisms:

- Is there an official responsible for supervising the evaluation processes at all levels of the project?
- Is there a system of incentives and sanctions for employees to ensure compliance with the complaint and response mechanisms?
- Is there an appeal process for both parties? Be it an internal appeal or external process?
- Are the people involved in assessing, investigating, and responding to the complaint independent from the subject of the complaint and the complainant?
- Do the outputs of the mechanisms include recommendations for corrective and preventive action within the organization?

And the **(III) Accessibility** that principals/would-be principals experience in relation to complaint and response mechanisms policies:

- Is information about the project's complaint mechanisms and its process easily available to principals/would-be principals in appropriate form and through appropriate media?
- Do the requirements for filing a complaint take into account the likely capabilities of the complainants?
- Are principals/would-be principals given support or advice in those cases in which they are unable to file a complaint due to technical or financial constraints?

The previous inquiries represent the operationalization that will be used to describe the empirical reality of the accountability relationship between the officials from the COMRURAL project and civil society in Honduras. It can be noted, as a summary, that this operationalization entails four dimensions (transparency, participation, evaluation, and complaint and response mechanisms); and each dimension has within itself four elements (policy development, policy content, implementation, and accessibility).

## **Chapter 4. Methodology**

The present study is an in-depth descriptive case study which analyzes, through qualitative methods, an embedded single case. The following chapter addresses the methodological aspects of this description.

First, the logic behind deciding to use a case study method is presented. Then, the deciding factors for selecting this study's case are laid out, followed by a detailed explanation and description of the qualitative methods used to collect data. Finally, in an attempt to clearly justify the choices made for this study, several criteria for judging the quality of a study's research design are applied to this work.

Additionally, practical and ethical considerations that apply to this research process are discussed at the end of this chapter.

### **4.1. Case Study Method**

When selecting a research method, there is no formula to unequivocally pinpoint the perfect research method for a study. Nevertheless, several factors can be taken into consideration to make a more accurate and informed decision. Some of these factors are (I) the study's research question;(II) the degree of control over the subject of study; and (III) the study's time aspect, among others (Yin, 2014).

Case study research is one of plenty research forms available for social science research. In his work, Yin (2014) explains that a case study method allows a researcher to investigate a phenomenon in its real-world context that can be exclusively contemporary or partially historic. He argues that the case study method enables researchers to carry out investigations in cases where the boundaries between the phenomenon and the context around it are not clearly defined. The phenomenon studied by the researcher constitutes what is known as “the case” (Yin, 2014).

Regarding research questions, Yin (2014) argues that they are good starting points on the path towards selecting a good research method. He explains that, in those cases where research questions seek to explain “how” or “why” a phenomenon took place, the case study method becomes relevant. Additionally, he states that the case study method becomes even more relevant if there is a need for an extensive and “in-depth” description of that phenomenon. This is because “how” and “why” questions tend to deal with operational links that need to be traced over time in an explanatory manner (Yin, 2014). Doing so is something that may be achieved more easily with the case study method.

It must be noted that Yin’s categorization of research questions does not assign exclusiveness, nor does it exclude research questions from other specific research methods. Instead, it is a guide that points towards the most relevant, but not exclusive, research method that a researcher can use. This means that other methods can also be applied to “how” and “why” questions.

For the present study, Yin’s criteria for “how” questions apply for research questions number one and number four:

1. *How did the accountability relationship between civil society in Honduras and the World Bank’s COMRURAL project officials occur?*
4. *If accountability gaps are found; how did they affect, or not, the members of civil society in Honduras?*

The remaining research questions for this study fall into the category described by Yin (2014) as exploratory “what” questions. In studies with exploratory questions, any method can be used; meaning, such questions are compatible with the case study method, but some researchers might also use experiments or surveys to address them. For this research, the case study method has been selected. Exploratory “what” questions usually function as a justification to carry out an exploratory study that has the goal of developing future hypotheses, or propositions for further inquiry. Research questions two and three follow such logic:

2. *What elements, from a theoretical accountability relationship, are missing in the accountability relationship between civil society in Honduras and the World Bank’s COMRURAL project officials?*
3. *If accountability gaps are found; what factors or situations originated them?*

Secondly, regarding the degree of control over the subject of study, we can find two scenarios. In the first scenario, the researcher is able to manipulate the subject of study as well as the context around it. An example of this could be a laboratory experiment. In the second scenario, the researcher has no capacity to manipulate the subject of study or its context; instead, the researcher limits its role to observing, inquiring, and analyzing. The present study falls under the second scenario and, according to Yin (2014), under such scenarios, it is more relevant to use the case study method. He argues that case studies should be preferred when examining events in which behaviors cannot be manipulated. For the present case, the accountability relationship between COMRURAL officials and civil society members in Honduras was observed in its real-world context without manipulating or controlling for the behavior of any of the participants involved.

Lastly, regarding the study's time aspect, it is more favorable to use the case study method whenever the subject of study is a contemporary event. This is so because, even though case studies utilize many techniques used in historical methods, it allows researchers to use two extra sources of data usually not used in historical methods. These additional sources are "direct observation of the events being studied and interviews of the persons involved in the events" (Yin, 2014, p. 12). Both of these sources were necessary for this study. Consequently, once again, the case study method resulted to be the most appropriate methodological option.

### **Defining and Bounding the Case**

The first steps for defining this study's unit of analysis, what would be known as the "case", began with the definition of its research objectives.

This study's main research objective is to "*expand the knowledge about accountability relationships between international organizations and civil society in recipient countries where projects are implemented*". Therefore, the case had to involve an international organization that had, or was in the process of, implementing a project in a specific country. Additionally, that project implementation had to involve, to some extent, members of the country's civil society.

Practical constraints, such as data availability, also have an impact in defining a case. At the beginning of this study, two international organizations were considered: The World Bank, and the European Commission. The defining characteristic for this selection was that both organizations have an online database, allowing for easy access to information regarding their aid projects. These databases are the WB's Online Project Database and the European Commission's EU Aid Explorer.

After defining the possible international organizations, the next step was to define a country and, after that, a project implemented in that country. Because of data availability, the first potential country for this study was Turkey. Turkey is considered by the OECD as the biggest recipient country of EU support as of 2017 (OECD) and also has several projects funded by the WB. Nevertheless, while examining potential projects in Turkey, a second practical constraint was determinant in the reasoning to drift away from studying this country; namely, the language barrier. Even though project documents and general statistics were usually available in English, interviews would pose a major challenge for this research if the interviewees were not able to



communicate fluently in English. This practical constraint led to the second option: Honduras. Case studies, as a research method, require deep levels of contextual detail. In order to obtain the experience of interviewees in the requisite rich detail, it would be significantly easier if both the interviewees and the researcher shared a common native language. It was more accessible to carry out the research in a country known by the researcher, and with Spanish as its native language.

In line with this practical consideration, World Bank projects in Honduras covered a wide variety of areas such as education, cultural promotion, government strengthening, development, infrastructure, and human rights, among others (World Bank). With a broad field of projects to choose from, the temporal aspect played a key role in selecting among the aforementioned options. The COMRURAL project had two valuable characteristics for this study: (I) It had just recently been extended, meaning that officials would still be reachable for interviews, and; (II) it was old enough, started in 2009, to be able to assess policy development and project results.

The final steps for selecting this study's unit of analysis refer to a further bounding of the case. According to Yin (2014), bounding the case helps in determining the scope of future data collection, and will help the researcher distinguish data about the subject of study from data external to the case. Meaning, data from "the phenomenon" is not mixed with data from "the context". Therefore, within the COMRURAL project implemented by the WB, and in line with the study's research objectives, the case would be limited to the *accountability relationship* between its officials (agents), and members from civil society involved or impacted by the project (principals/would-be principals). Even though this might seem redundant, it is necessary to bound the case and state its dimensions. Only by doing so, is it possible to understand that other certain characteristics from the project, such as its finances, efficiency, impact on development, impact on the environment, or others, are to be considered contextual unless they have a direct connection with its accountability relationship.

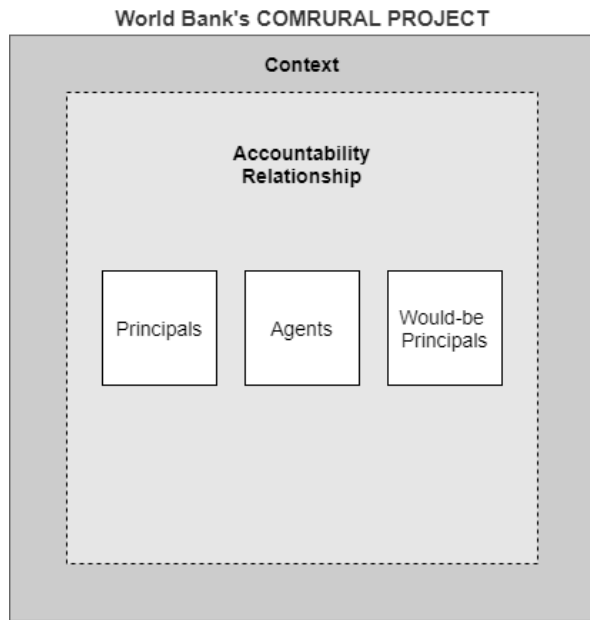
### **The Case's Formal Design**

Yin (2014) argues that case study research does not usually include formal designs in their studies, and successful case studies can be done without one. Nevertheless, presenting a formal design for a case study can strengthen it, and enables an easier comprehension of the methodological decisions behind it.

This study follows a single-case design because it seeks to describe a *common case*. Its objective is to capture the circumstances and conditions of a normal situation, an accountability relationship, because of the lessons this could provide regarding the social processes related to it (Yin, 2014).

Secondly, according to the types of design elaborated by Yin (2014), it also follows an embedded design because it has different units of analysis. These different units of analysis are the agents, principals, and would-be principals found within the accountability relationship.

A visual representation of the formal design for this study's case would be:



*Figure 4. The dotted lines between the “Accountability Relationship” box and the “Context” box, signal that the boundaries between this two are not likely to be clearly defined. This visual representation is based on Yin’s matrix for Basic Types of Designs for Case Studies (Yin, 2014, p. 50).*

## 4.2. Data Collection – Document Analysis and Interviews

In his work, Yin (2014) points towards characteristic features that emerge in case studies. Even though the author did not refer to these features as guides or hurdles for data collection, it was acknowledged in the early stages of this study that such features could be relevant for the data collection stage as well. Therefore, to some degree, they served as guiding cornerstones of the data collection process:

1. The author explains that case studies could sometimes overwhelm researchers as they uncover too many variables of interest. This occurs because case studies involve in-depth inquiries of events that occurred across a prolonged period of time and, on top of that, case studies tend to include data about the contextual conditions that surrounded such events. In order to control this characteristic feature, it is better to rely on multiple sources of evidence and attempt to triangulate information in order to provide accurate depictions of the event being studied. Consequentially, this study relies on documents, interviews, and direct observations as data which is later converged.
2. The author also points out that another feature of case studies is that they benefit from prior developments of theoretical propositions to guide data collection. Regarding this feature, by constructing first a theoretical operationalization of what is understood as “Accountability” and “Accountability Relationships” for this study, it was possible to ensure more effective data collection. This makes it clear which data would be relevant for the study and which data should be discarded or ignored because it was not relevant.

This study’s data collection and analysis methods are entirely qualitative. Below follows a detailed description of the data collection procedures and content of this study’s sources of evidence: documents, interviews, and direct observation. The reason for using multiple sources of evidence

is that this allows the researcher to develop converging lines of inquiry, ensuring that findings are more likely be convincing and accurate as they are backed up by several different sources (Yin, 2014). It must be noted that several tools were used to complement the data collection procedures described below. These include: a registry of potential interviewees, a field work calendar, a research journal, a registry of sent interview and document requests, and an anonymization registry.

The initial steps of this study required document analysis in order to identify the organizational structure of COMRURAL, its policies, and the normative characteristics of the accountability relationship between agents and principals/would-be principals involved in the project. The first documents were acquired directly from the WB's Online Project Database. The database has no restrictions and documents were identified and retrieved easily. These documents are COMRURAL's Project Appraisal Document and its Implementation Completion and Results Report; they are considered the "initial documents" of this study.

A second set of documents considered as "COMRURAL Internal Documents" are either policy documents or internal bylaws of different units of the project. These documents were identified after analysis of this study's initial documents. All of them were acquired by using the government's "Portal Único de Transparencia" (Unique Portal for Transparency) which is accessed through the website of the government's "Instituto de Acceso a la Información Pública" (Institute for the Access to Public Information). On the 25<sup>th</sup> of October of 2019 a request to receive digital versions of all of these pre-identified documents was submitted via the transparency portal and registered under code SOL-SAG-215-2019 (Request attached as Annex #2). On the 6<sup>th</sup> of November of 2019, the requested documents were received through the "Sistema de Información Electrónico de Honduras" (Honduras Electronic Information System). Lastly, complementary documents, such as a series of "Success Case Story" made by the Honduran Ministry of Agriculture and Livestock, were available online and retrieved from government webpages.

Through document analysis, it became possible to distinguish the most important policy documents regulating the project and related to its accountability relationship. These are the WB's Project Appraisal Document and COMRURAL's Operational Manual. A secondary stage of document analysis was plausible due to interviewees making reference to other documents that had not been collected. However, these documents were requested via e-mail to the corresponding participants and no reply was received. A detailed description of all documents is given below in Table 1.

Detailed Overview of Document Collection	
<b>Type:</b> World Bank Documents	
<b>Quantity:</b> 3	
<b>Retrieved From:</b> World Bank's Online Project Database	
<b>Description:</b>	<ul style="list-style-type: none"> <li>• Implementation Completion and Results Report</li> <li>• Project Appraisal Document</li> <li>• Evaluation Synthesis for the COMRURAL Project</li> </ul>
<b>Type:</b> Government of Honduras Documents	
<b>Quantity:</b> 5	
<b>Retrieved From:</b> Ministry of Agriculture and Livestock	
<b>Description:</b>	<ul style="list-style-type: none"> <li>• Success Case Story: Beekeepers from Copán</li> <li>• Success Case Story: CAPUCAS Coffee</li> <li>• Success Case Story: Don Augusto Coffee</li> <li>• Success Case Story: Ali Milk</li> <li>• Success Case Story: Western Effort Agricultural Cooperative Limited</li> </ul>
<b>Type:</b> COMRURAL Internal Documents	
<b>Quantity:</b> 10	
<b>Retrieved From:</b> COMRURAL National Coordination	
<b>Description:</b>	<ul style="list-style-type: none"> <li>• COMRURAL's Participating RPO's Registry</li> <li>• Operational Manual</li> <li>• Business Plans Formulation Guide</li> <li>• Business Profiles Formulation Guide</li> <li>• Evaluation Committee Bylaws</li> <li>• Directive Committee Bylaws</li> <li>• Public Callings Guide</li> <li>• Criteria to evaluate business profiles</li> <li>• Social and Environmental Management Framework</li> <li>• Social Participation Plan</li> </ul>
<b>Requested Documents That Were not Received</b>	
<b>Quantity:</b> 6	
<b>Description:</b>	<ul style="list-style-type: none"> <li>• INVEST-H's Transparency Bylaws</li> <li>• COMRURAL's Complaints Document</li> <li>• COMRURAL's Standard Work Contract</li> <li>• World Bank Office in Honduras' Access to Information Policy</li> <li>• WB's Memorandum for Private Banks to facilitate co-financing access to RPOs</li> <li>• WB's Indigenous Consultation Memoirs for the COMRURAL project</li> </ul>

*Table 1. Detailed description of the documents collected for this study.*

The second step of data collection for this study was done through interviews. In order to carry out data collection through interviews, it was necessary to define the study’s population and sample. The population of a study refers to all the individuals who fit the criteria laid out by a researcher in a specific study (Saumure & Given, 2008). In this study the population would be all the agents and principals/would-be principals that had participated in or had been impacted by the COMRURAL project.

Regarding a study’s sample, Morgan (2008) defines this as “the set of actual data sources that are drawn from a larger population of potential data sources”. The criteria or methods that researchers

use to select that “set of actual data” are varied and will depend on the design and objectives of the research. For this study, purposive sampling has been used to select a sample, meaning that the sample was not randomly selected, but instead logically assessed as being representative of the study’s population.

Palys (2008) defines purposive sampling as a series of strategic choices about with whom, where, and how one performs research. Consequentially, he states that, researchers that use purposive sampling connect their sample criteria to their research objectives (Palys, 2008).

Consequently, interviews for this study required individuals that were able to help fulfill the previously defined research objective of “*accurately describing, through a theoretically operationalized logic, the accountability relationship between an international organization and the members of civil society*”. Because of their empirical experience, three sets of individuals, involved in COMRURAL’s accountability relationship, met that criteria: agents, principals and would-be principals.

The only criterion applied to all of the individuals was a geographical one. COMRURAL has three regional coordination offices. It was possible to encounter both project officials and project participants in all of these regions. Nevertheless, one of these offices presented a unique characteristic regarding possible would-be principals. Therefore, the regional coordination in the department of Copán was chosen for this study because of its historic value regarding ethnic groups in the country. In the aforementioned department, it is possible to encounter high concentrations of the largest and sixth largest ethnic group in Honduras according to the International Work Group for Indigenous Affairs (“Indigenous peoples in Honduras,” 2011). These groups are the Lenca and Chortí people, respectively. Obviously, it must be understood that the previous criterion did not apply to agents with national roles or general oversight responsibilities.

Regarding agents, the WB’s policies to develop their projects were essential to select relevant agents to be interviewed. This is because a project like COMRURAL is not executed on the field directly by WB officials, but instead is carried out by an implementing agency; in COMRURAL’s case, the implementing agency was Invest-Honduras. Consequently, at least two different types of agents had to be interviewed: (I) officials from the WB with knowledge about the overall status of the project and its initial stages, such as the project’s appraisal and consultation; (II) agents who were employees of the implementing agency, with knowledge about the project’s field experience, technical knowledge, and a more direct contact with members from civil society.

Regarding principals and would-be principals, it was essential to balance those receiving direct benefits, or that had an official participation relationship with the project, and those indirectly benefitted or impacted. Here, two different types of individuals were identified: (I) those participating in the project and receiving financial benefits in the form of co-financing from it; (II) those who had been denied participation in the project or that did not try to participate but lived in the regions where the project was being executed. These distinctions represented a good balance between principals and would-be principals.

For the first type, participants from different business sectors participating in the COMRURAL project were selected. The only additional criteria to select them was data availability; if it was

possible to contact them digitally to request an interview, they were considered for the study. It was expected that, due to the differences across their businesses, they would all have different experiences regarding the project's accountability relationship and would therefore increase representativeness. For the second type, contact was established with the indigenous organizations mentioned in the project's appraisal documents. These indigenous representatives also had varying perspectives; some communities were active participants in the project while others had been denied participation, and still others had never tried to participate in COMRURAL. All of these groups were based around the department of Copán.

The desired pool of interviewees was determined using the previously explained purposive sampling and consisted of:

- Two World Bank officials working in Honduras: (I) COMRURAL's current Team Leader for the World Bank; and (II) World Bank's contact person in the country.
- Two officials from the Honduran government involved in the COMRURAL project: (I) COMRURAL's national coordinator; and (II) COMRURAL's Regional Coordinator for the department of Copán.
- Three representatives from RPOs based in the department of Copán that were active members of approved productive alliances executed under the COMRURAL project: (I) an RPO dedicated to beehive farming; (II) an RPO dedicated to dairy production; and (III) an RPO dedicated to vegetable distribution.
- Three representatives from indigenous communities or indigenous organizations based in the department of Copán, recognized by the Honduran state, and mentioned in COMRURAL's policy papers. Policy papers mentioned six organizations from two different indigenous groups: (I) the Lenca people; and (II) the Maya-Chortí people.

All of the aforementioned individuals' and organizations' contact details were acquired through the organization websites, if available, or through social media networking. Initial contacts were made with relevant actors through e-mail and other forms of digital communication such as Facebook Messenger and WhatsApp during the months of November - December 2019.

Due to practical constraints and availability of the interviewees, the final pool of interviews was different than the originally plan. The final pool of interviewees that participated in this research is the following:

- **Agents:**
  - Agent 1 (A-1): COMRURAL's National Coordinator.
  - Agent 2 (A-2): COMRURAL's Regional Coordinator for Copán.
  - Agent 3 (A-3): COMRURAL's Social Specialist.
  - Agent 4 (A-4): World Bank's Rural Development Specialist and Team Leader for the COMRURAL project in Honduras.
- **Principals:**
  - Indigenous Representative 1 (IR-1): Indigenous representative from the "Coordinadora Nacional de Indígenas Maya Chortí" (National Coordinator for Maya-Chortí Natives) (CONADIMCH).

- Indigenous Representative 2 (IR-2): Indigenous representative from the “Movimiento Indígena Lenca de Honduras” (Indigenous Lenca Movement of Honduras) (MILH).
- Indigenous Representative 3 and Indigenous Representative 4 (IR-3 / IR-4): Indigenous representatives from the “Consejo Nacional Indígena Maya Chortí” (Maya-Chortí National Indigenous Council) (CONIMCH).
- Project Participant 1 and Project Participant 2 (PP-1 / PP-2): Board President and Secretary of the “Asociación de Productores de Lácteos de Copán” (APROLAC), a dairy product company participating in the COMRURAL project.
- Project Participant 3 (PP-3): President of the board of the “Cooperativa Agrícola Esfuerzo Occidental Limitada” (CAEOL), an agricultural cooperative specializing in vegetable collection and distribution, participating in the COMRURAL project.

A total of 8 interviews were scheduled and successfully carried out during the last weeks of January 2020. The interviews with COMRURAL’s National Coordinator and the WB’s Rural Development Specialist took place in Honduras’ capital city, Tegucigalpa. The remaining interviews took place in the cities of La Entrada, La Jigua, Dulce Nombre, Copán Ruinas and Santa Rosa de Copán; all of them located within the department of Copán.

Detailed Overview of Interviews	
<p><b>Type:</b> Interview with Project Agents  <b>Participants:</b> 4 (169 minutes of recorded audio)  <b>Location and Method:</b> Face to face interview at agent's office.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• One interview was made with two simultaneous interviewees</li> </ul>	
<p><b>Type:</b> Interview with Project Principals/Would-be Principals  <b>Participants:</b> 7 (143 minutes of recorded audio)  <b>Laction and Method:</b> Face to face interview at the principal's organization offices.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• Two interviews were made with two simultaneous interviewees.</li> <li>• Two interviews happened at public coffee stores determined by the principal.</li> </ul>	

Table 2. Detailed description of the interviews made for this study.

All interviews had been planned as individual interviews. However, during three interviews, the participants requested to have a second interviewee join them; therefore, three interviews took place with two simultaneous interviewees while the remaining five were individual interviews. The agreed duration for each interview had been one hour, but in several cases the duration was shorter. To facilitate participation, the GAP Framework modification utilized to operationalize this project’s accountability relationship was translated to Spanish and all interviews were held orally

in Spanish due to that being the native language of all interviewees. Audio from all of the interviews was recorded with a personal device after receiving written consent from the participants. Afterwards, interview transcripts were made through use of Microsoft Word and an audio player. Once all interview transcripts were finalized, they were sent digitally to each interviewee for corrections or clarifications. None of the interviewees requested any edits in the transcripts or withdrew their participation.

One special comment must be made about the data collected through interviews. It must be noted that there is a probability for the interviewees' information to carry a bias depending on whether or not they have received benefits from COMRURAL. In a similar fashion, some of the events under inquiry took place a long time ago (e.g. the WB's early consultations, which took place more than a decade ago) and interviewees may recall them inaccurately. Nevertheless, in spite of this, the data presented in this research is able to stand as relevant and accurate because complementary sources of evidence were used. These were triangulated with the data collected from interviews. This has been done as an attempt to help reduce any impact on validity due to inaccuracies or biases that could affect this study and its findings.

Regarding the last source of evidence for this study, direct observation was carried out at the same time period as the interviews. When holding the interviews with participant RPOs from the COMRURAL project, it was possible to visit their offices. In both cases, these offices were located in the same area where the RPOs carried out their production or distribution activity. Consequently, it was possible to see some situations previously described by other actors, or by the RPOs themselves, which were relevant to the study. Besides being able to see infrastructure projects constructed with funds given by the COMRURAL project, it was possible to see the RPO's daily work activities, and a series of billboards installed in the entrance of every COMRURAL funded project which contained project financing information and contact details. Later in this research, those billboards became relevant for understanding certain elements of the project's accountability relationship. During direct observation, photographs were taken with a personal device and with the permission of the involved actors.

#### **4.4. Practical and Ethical Considerations**

The following section addresses several hurdles faced during the process of writing this research. This exercise is undertaken to increase the study's reliability and for the sake of transparency. By explaining what was done to control for these hurdles, confidence in this study's findings can be increased and a clearer image as to why these findings can be considered accurate can be portrayed.

The original plan for this study's data collection entailed a four-week fieldwork period during which interviews would be held in Honduras. The plan consisted of holding all eight pre-agreed interviews in the last two weeks of January 2020, and holding a second round of interviews with the same participants in the first two weeks of February in order to make clarifications and ask for comments regarding the experiences expressed by other interviewees in an attempt to triangulate facts. Due to unforeseen circumstances related to the country's high criminality rate, February's complementary round of interviews had to be cancelled.



Therefore, there was an unequal opportunity for the interviewees to comment on project experiences mentioned by other interviewees. Meaning, the last participants of January's two week interview period had the ability to agree or disagree with information mentioned by previous interviewees, and the first participants did not have the chance to do the same.

20	21	22 [REDACTED] [REDACTED] (OFICINAS PRINCIPALES COMRURAL POR LAMAÑANA) BANCO MUNDIAL POR LA TARDE	23	24	25	26
27 COMRURAL REGIONAL 10AM (SANTA ROSA COPÁN) [REDACTED] NEZ (MILH) (TARDE, SANTA ROSA DE COPÁN)	28 ASOCIACIONES INDÍGENAS (COPÁN RUIÑAS)	29 CAEOL 10AM (LA JIGUA COPÁN) APROLAC POR LA TARDE (DULCE NOMBRE)	30	31	Notes:	

Image 1. Snapshot of the first two weeks in this study's original field work calendar. Participant names have been crossed out to respect anonymity.

This issue had not been taken into account during research design, and due to the original fieldwork being modified, a second trip was taken into consideration. This complementary second trip had to also be cancelled due to the travel restrictions that occurred globally due to the COVID-19 pandemic. Nevertheless, other measures were taken in an attempt to reduce the aforementioned inequalities. E-mails were sent to interviewees asking them for clarifications or for comments on topics that directly related to them and had been commented on by other interviewees. No participant responded to any of them. Even with these practical issues, the data collected from interviews was, in its majority, uncontroversial between participants. There was no need to further inquire due to strong disagreements between actors' experiences and, when needed, project documents were used to verify claims. Therefore, even with these unexpected hurdles, the complementary data used for the study has made it possible to present a clear empirical description of the project's accountability relationship and present concrete conclusions.

The Norwegian Center for Research Data (NSD) has reviewed and approved this study's research design, data collection, and storage methods, as well as the use of the personal information of the interviewees for academic purposes. Accordingly, this study is in compliance with Norwegian and European Union data protection requirements, with all participants in full awareness of their rights.

Regarding ethical considerations, an anonymity dilemma emerged from the fact that all of the interviewees were either public officials or board members from an indigenous or rural producers' organization. In order to accurately describe the accountability relationship from the COMRURAL project, it was needed to specify the roles and characteristics of the involved agents and principals/would-be principals, because these could be relevant to assess how prone they are to

suffer from the effects generated by the accountability gaps, their degree of accountability in a specific situation, or how different characteristics enabled different participation degrees in the project. Consequently, written consent had to be requested from all interviewees allowing for this study to include descriptions that could lead to their direct identification in the future. No interviewee expressed any concern regarding this. Still, all available anonymization measures that do not affect the descriptive quality of this study have been taken.

The author of this research applied for grants to cover the costs related to data collection. At the moment of data collection all expenses related to this study were covered independently by the author. Nevertheless, after concluding data collection, and while finishing redaction, the Meltzer Research Fund approved a grant of 16,000 NOK for this study as part of their efforts to promote academic activities at the University of Bergen. This grant covered most of the expenses that have been incurred.

### **4.3. Quality of the Research Design**

The quality of a research design can be assessed by using several logical tests. In his work, Yin (2014), describes four tests that have been commonly used to test the quality of empirical social research like the study at hand. These tests are common to several scientific methods, and they have been described and operationalized in other works besides Yin's. The author mentions four tests: *construct validity*, *internal validity*, *external validity*, and *reliability*. How each of these tests relates to this study is elaborated in the following section.

Regarding this study's internal validity, the test is not relevant as the present study is of a descriptive nature and does not deal with establishing causal relationships. Therefore, internal validity will not be assessed.

#### **Construct validity**

This test deals with "identifying correct operational measures for the concepts being studied" (Yin, 2014, p. 46). Yin (2014) argues that this test represents the biggest challenge when doing case study research. He addresses the fact that the most common critique made towards case study research is that, very often, researchers fail to develop an operational set of measures and instead follow "subjective" judgements, tending to confirm their own preconceived notions, to collect data. He states that to avoid this, researchers must follow two steps:

1. Define specific concepts for their subject of research and link them to the study's objectives.
2. Define operational measures that match those concepts.

In the present study, the theoretical section, presented in previous chapters, aids in meeting both of these requirements. The subject of research concept is clearly defined as an *accountability relationship with 4 specific dimensions* between agents and principals/would-be principals. Secondly, the *accountability relationship* will be measured by describing the elements found in the empirical reality regarding the policies and activities that regulate the aforementioned

dimensions: meaning, their content, their development, their implementation, and their accessibility.

These concepts and measures are strengthened, to avoid subjectivity, by using multiple sources of evidence which are later triangulated. This study's construct validity could have been strengthened further by sharing its draft versions with interview participants and other relevant actors. Unfortunately, that was impossible due to language limitations.

### **External Validity**

This test deals with “defining the domain to which a study's findings can be generalized” (Yin, 2014, p. 46). According to Yin (2014), knowing whether or not a case study's findings are generalizable beyond the immediate study relates directly with its capacity to provide analytic generalizations. Due to this being a single-case study, replication or comparative logic cannot be used to strengthen its generalizations. Instead, it relies on the broader applicability of the theory being assessed.

The theoretical framework that guides this study's data collection and analysis serves the purpose of strengthening its external validity. Consequently, the findings from this study could be generalizable to other empirical cases but due to its exploratory nature, more research is needed before making such a claim.

Nevertheless, it is possible to state that that this study's theoretical propositions and its operationalization can be applied to other similar cases or situations that concern accountability relationships. Doing so would be both relevant and valid. If this is done, the findings from this study, and the ones from similar cases, could develop in a similar fashion across accountability relationships between members of civil society and international organizations. If they do not develop in a similar manner, further research can address the causal relationships that have influenced each accountability relationship.

### **Reliability**

This last test deals with “demonstrating that the operations of a study – such as the data collection procedures – can be repeated, with the same results” (Yin, 2014, p. 46). Yin (2014) argues that the goal of reliability is to minimize a study's error and bias. Several measures have been taken in order to facilitate the possibility of future researchers repeating the same procedures carried out in this study and consequently making it easier for them to achieve the same findings. First of all, a research journal and a progress plan were created which would allow for a clear timeline and description, step by step, of how the events concerning this study took place.

Secondly, all the data concerning this research has been stored in a single database. This includes relevant literature, data collected through fieldwork, data related to communications and requests, personal notes, and feedback on drafts, among others. Lastly, the data collection procedure has also been carefully and extensively recorded and is presented in this study's corresponding section.

## **Measurement Validity**

This last section has been included due to this study's theoretical conceptualizations, and its heavy reliance on them, in order to describe the empirical reality about the accountability relationship from the COMRURAL project.

When speaking about measurement validity, it should be understood as the “issues that arise in moving between concepts and observations” (Adcock & Collier, 2001, p. 530). The relationship between concepts and observations has been depicted by Adcock and Collier (2001) as something made up of four levels. By presenting the level descriptions made by them, and explaining how they apply to this study, it is possible to create a clearer image of the measurement procedures carried out in this study. This can be seen in the following section:

Level 1. Background concept: this encompasses all the diverse meanings associated with any given concept. For this study, as explained earlier, the contested concept of Accountability, and more specifically Accountability Relationship, are considered the background concept.

Level 2. Systematized concept: this refers to the specific formulation of the concept which has been adopted for a particular research; meaning, a specific definition. For this study, the definition of what is an Accountability Relationship has been established in the “Concepts” section from “Chapter 3”.

Level 3. Indicators or Measures: these are the scoring procedures which could be either quantitative indicators or classification procedures for qualitative research. Even though this study is not applying scores to the accountability relationship, the indicators or measures used to accurately describe it are just as important. The different accountability dimensions and their elements account for this level.

Level 4. Scores for cases: these are the numerical scores in quantitative research or the results of qualitative classification in qualitative research. For this study, the empirical findings described in each of the accountability relationship's dimensions and their corresponding elements account for this last level.

Adcock and Collier (2001) explain in their work that the upward and downward movement a researcher does across these levels throughout his work, should be understood as a series of research tasks required for achieving measurement validity. Moving from level 1 to level 2 entails the task of “Conceptualization”, which has been done in section 3.1 of this study; moving from level 2 to level 3 entails the task of “Operationalization”, which has been done in section 3.6 of this study; and lastly, moving from level 3 to level 4 entails the task of “Scoring the cases” which is done in Chapter 5, after collecting data, by providing the description of the empirical reality of the accountability relationship in the COMRURAL project.

The empirical descriptions provided ahead (the scores), derive from a set of predefined indicators (four accountability dimensions and the different elements within them) that have been operationalized from a systematized concept called “Accountability Relationship”. Since it is

possible to interpret, through logical means, those scores and their indicators in terms of a larger, systematized concept, it is therefore possible to infer a significant degree of measurement validity.

This chapter has thoroughly explained the methodological decisions made for this study and the challenges faced by doing so. Disclosing ethical and practical considerations, and scrutinizing the quality of the research's design, serve as a transparency tool for the reader to independently assess the validity of this study's conclusion. Several measures have been taken to overcome or mitigate any negative effect that the aforementioned challenges could have caused, and this should aid in safeguarding the study's relevance and soundness.

## **Chapter 5. Analysis**

Data analysis began with the WB's Project Appraisal Document and the WB's Implementation Completion and Results Report. These two documents were the main sources of information used to identify other important documents in the COMRURAL project. Once additional documents had been identified and collected, their content was categorized under the different accountability dimensions and their corresponding elements. This constituted the normative aspect of the project, meaning, how the policy documents stated that the project should be. That information was later converged with the data, about the same dimensions and elements, that had been acquired from the interviews and direct observations.

Once all of the interviews had been transcribed, and corrections had been requested from the interviewees, data analysis from the transcripts was done manually through use of pen and paper, to categorize the interviewees' experiences under the corresponding accountability dimensions and their elements. Any information that did not fit a specific accountability dimension was noted separately and constituted a secondary data set which was stored in case it was later deemed as necessary or relevant for this study.

The following findings are the result of data convergences between the documents and the interview data collected. These findings describe the empirical reality found in every element across the four dimensions of accountability that have been operationalized for this study. For the sake of clarity, the findings are presented in the same sequential order as they were introduced in the operationalization section. Before presenting data related to the accountability dimensions, the next section describes COMRURAL's organizational structure. This is needed in order to better understand the agents' role in the implementation of the project.

### **5.1. Organizational Structure of COMRURAL**

COMRURAL's organizational structure is defined in the project's Operational Manual and this section is a synopsis of that document (Inversión Estratégica de Honduras, 2018). The Operational

Manual states that the Republic of Honduras is represented by the Ministry of Finances and acts as borrower from the WB. Additionally, the implementation of the project is delegated to “Inversión Estratégica de Honduras” (Strategic Investment from Honduras / INVEST-H) which is attached to the Ministry of General Government Coordination.

The WB is in charge of general oversight. Under them, there is a Directive Committee, which has the objective of securing coherence between the strategies and activities implemented in COMRURAL and other policies and programs from the national government.

The Directive Committee is responsible for: (I) ratifying the approvals of business plans made by the Evaluation Committee, (II) supervising the accomplishment of all of COMRURAL’s components, and (III) suggesting, when necessary, required strategic adjustments to ensure the implementation of COMRURAL’s components.

This Directive Committee is made up by the following actors:

- The minister of Agriculture and Livestock
- The Deputy Director from INVEST-H
- A representative from participating RPOs
- A representative from the Honduran Council of Private Enterprises
- COMRURAL’s National Coordinator (with no voting rights)

Under the Directive Committee is the Implementing Agency of the COMRURAL project: INVEST-H. The implementing agency, together with its working team, is responsible for the project’s execution. Its responsibilities include:

1. Carry out all activities related to the implementation of the project.
2. Prepare the Annual Operating Plan, budget, acquisition plan, and project reports in accordance with the requirements established by the government of Honduras and the WB.
3. Update the project’s communication plan.
4. Carry out technical supervision of all project activities, in compliance with the WB’s environmental and social safeguards.
5. Implement the project’s Monitoring and Evaluation System.
6. Prepare terms of reference and hire consultancies related to the implementation of the project while following up on their execution.
7. Receive and evaluate business plans through the Evaluation Committee and rule on them.
8. Prepare and sign contracts with the RPOs for the allocation of funds for the execution of business plans and follow up on their fulfillment.
9. Keep the Management Information System updated and operational.
10. Qualify Service Providers for Business Development, for the provision of services demanded by the RPOs participating in the project.
11. Prepare the acquisition plan and support the processes derived from it.
12. Prepare the payments of advance funds, its liquidations, and the documentation for the disbursement of non-refundable transfers to the OPRs.

13. Submit, on a semi-annual and annual basis, detailed reports on the physical progress of project activities to INVEST-H' executive management, the Directive Committee, and the World Bank.
14. Represent COMRURAL before the different institutions and actors involved in its execution.

INVEST-H's work team includes: (I) COMRURAL's national coordinator; (II) regional coordinators; (III) thirteen specialists in a wide range of topics such as social issues, market, evaluation, legal issues, communication, and environment, among others; (IV) three technicians for technological innovation, productive alliances, and evaluation; (V) one financial analyst; (VI) one acquisitions official, and several other support personnel. This structure can be modified at any time, if required, by the Directive Committee.

The following organization chart presents a synthesized layout of relevant officials, mentioned in this study, involved in the evaluation and implementation of the COMRURAL project:

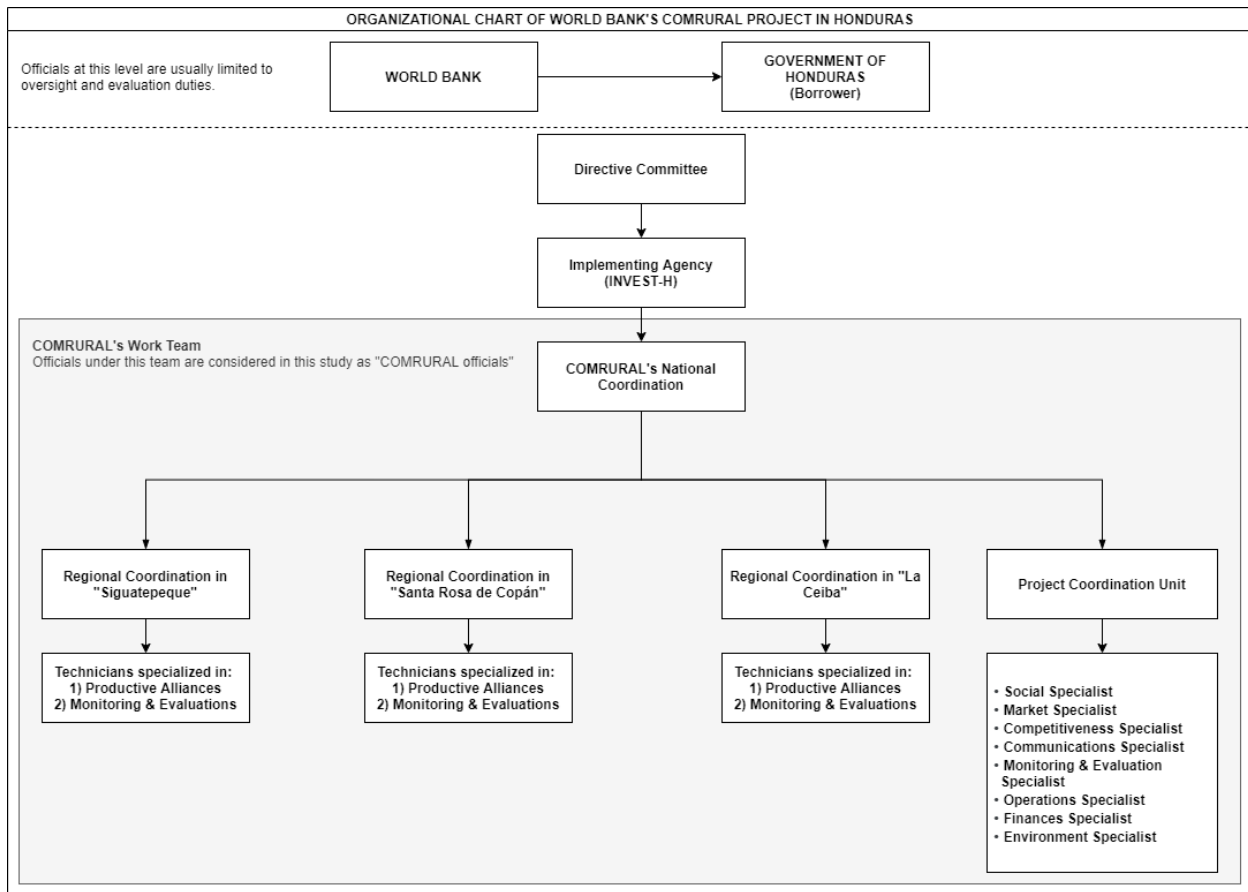


Figure 5. This organization chart is not an official document from INVEST-H or COMRURAL. It is a visual description of information collected from the project's operational manual, website, and interviews held with involved actors.

## **5.2 The Policy Development Element**

As explained in the operationalization section, this is the only element that has been assessed as a whole at once for practical reasons. The policy development process for all the documents that regulate the accountability dimensions of the COMRURAL project happened at the same time. Therefore, the policy development process is examined across all dimensions (Transparency, Participation, Evaluation and, Complaint and Response Mechanisms).

For the sake of clarity, the policy development element has been divided in three sub-sections. These sub-sections describe the role and experiences of the actors and include: first, the agents; second, the indigenous would-be principals; and third, the RPOs' principals.

### **Agents**

The WB's Rural Development Specialist expressed that COMRURAL was no different than any other WB project during its early stages, and therefore followed the normal standards regarding early consultations to design a project within the WB. He stated that doing so is a mandatory requirement within the bank's policies. The aforementioned standards include elaborating a consultation plan, and, afterwards, holding consultations in the identified target regions (The seven western departments of Honduras). Consultation is carried out by the local government with technical support supplied by the WB. The value of the feedback obtained in these consultations is assessed by weighting it against the previously defined project objectives. In COMRURAL, the overall objective had been defined as generating competitive value chains in Honduran markets.

He admitted that, through this approach, several actors that could be considered would-be principals, are excluded because they fall outside of the main objective of the project. An example of this would be smaller subsistence farmers from the region, or larger, well-established, agro-industries. Their feedback would not be considered relevant; a decision that had already been made and which usually happens at the earliest consultation stages or before consultations start. Regarding the project at hand, he expressed that the feedback received in the early consultations was included in COMRURAL's policy documents and that these reflect the needs of potential principals. This is so because, according to the WB's policies, civil society validation is required in order to approve the final design of the project.

COMRURAL's National Coordinator also expressed that early consultations were aimed towards actors that would, or had the potential to, participate in the project. He mentioned that, among others, some of those actors were civil society organizations from the target agro-business sectors, officials from the Honduran Ministry of Agriculture and Livestock and the Ministry of Finances, participants from projects similar to COMRURAL, indigenous organizations, representatives from the private sector in Honduras, and the Association of Livestock Farmers of Honduras. He added that the implementing agency has a limited role in early consultations because, once they receive the project's main policy document, the Operational Manual, the early consultation stage has already been finalized by WB's technicians. Therefore, what the implementing agency does is to socialize the approved documents. According to the interviewee, the socialization process that is carried out, once the final design is approved, is also part of the policy development stage.



Nevertheless, there is no written record of any feedback received during these socialization processes. COMRURAL's National Coordinator also believes that the project's policies reflect the needs of the people consulted. In the perspective of the interviewee, this belief is supported by the positive feedback received during the execution of the project.

It must be clarified that *socialization*, for all of the interviewees and for this study, refers to the *process* carried out by agents through which they share, make available, and explain project documents with principals/would-be principals. Through this procedure, agents ensure that participating principals/would-be principals have knowledge about the existence of the documents and their contents. Unlike the procedures of a consultation process, in which principals/would-be principals are allowed to give feedback and actively shape the documents, the *socialization process* described in this study refers to a situation in which principals/would-be principals are not allowed to propose changes to the documents and are limited only to a learning role. If agents are able to make sure that all the participants understand the contents of the documents, the socialization process is considered successful; whether or not participants agree with the content of those documents or are given the opportunity to provide feedback is not considered.

At the regional office of Copán, COMRURAL's Regional Coordinator for Copan and COMRURAL's Social Specialist, expressed that the policy development in the COMRURAL project was in large part based on the previous experiences from the WB's "Honduras Access to Land Pilot Project" (PACTA). At the end of PACTA, civil society members that had benefited from the project participated in a final evaluation which captured the positive and negative aspects of their experiences. This was used as a base for COMRURAL's proposal, and for defining the target population. The Social Specialist also mentioned that external consultants were hired to carry out environmental and social evaluations in 2007, and it was there that civil society actors had the opportunity to give their input and shape the project through a set of workshops that were organized. Nevertheless, no written record of these workshops has been found.

Both of these interviewees also consider that, because interested actors are able to validate the policy throughout this period, the socialization processes are part of the policy development stage. COMRURAL's Social Specialist acknowledged that "in Honduras socialization processes tend to be vertical." He expressed that a mix between vertical and horizontal processes is achieved by including experiential learning from previous projects; therefore, by including the evaluation reports made at the end of the PACTA project into COMRURAL, he considers that officials achieved a way of horizontal feedback. Under this context, horizontal feedback would entail processes in which there is democratic participation among all involved actors which are able to give feedback to project officials in charge of decision-making.

Lastly, both of them acknowledged that the impact zone of COMRURAL is a historical zone for indigenous groups. Consequently, contentment acts were required from indigenous groups before project approval. These were acquired during the social evaluation stage. Such approvals, according to the interviewees, are the best proof that project policies are not in conflict with civil society needs in the area. They expressed that the project is considered by local communities to be a benefit to development and, due to its nature, it is also considered a support mechanism rather than an imposition. This argument is based on the project's dynamic of allowing civil society

organizations to define their own business proposals, and, after doing so, voluntarily entering an application process to participate in COMRURAL. COMRURAL does not give pre-made business plans. Therefore, it is considered that participating RPOs have freely defined their own priorities and interests.

### **Indigenous Would-Be Principals**

The representative for the Indigenous Lenca Movement of Honduras (MILH), IR-2, is a known representative of Honduras' largest native group. He has been involved, directly and indirectly, in the COMRURAL project since 2010. He expressed that, since the early stages of the project, his organization has made a request to the government of Honduras to demand from the WB the application of the WB's Operational Manual, "OP 4.10," which regulates WB's staff responsibilities when engaging in projects that involve indigenous populations. He argued that such responsibilities were not entirely fulfilled. When asked about the specific details of this claim, no clear explanation was given regarding which responsibilities had not been fulfilled.

IR-2 stated that his organization participated in the WB's consultations made in Honduras while designing the COMRURAL project; their participation consisted in the attendance of a set of workshops organized by the WB and the Honduran national government. At the workshops it was common that he, and other indigenous representatives, suffered discrimination based on the stereotype that, because they were from indigenous backgrounds, some topics were too technical or highly political for them to understand and give feedback on. Consequently, in his opinion, the consultation process was merely a socialization of documents. His organization never really had a chance of changing or influencing the documents' final outcome. He expressed that these situations entailed a set of unwritten filters usually applied by bureaucrats to exclude the opinion of indigenous people. According to his experience, the consultation and socialization processes that involve indigenous communities in Honduras are designed under a logic of verticality, which limits their ability to impact decision-making. He also pointed out the fact that, usually, these designs are already decided upon, exclusively by agents, a long time prior to principal/would-be principal engagement.

The organization represented by this interviewee is named in the project's appraisal document as an indigenous organization approving the project. In response to this, the respondent argued that, in COMRURAL's case, these organizations were invited to the socialization processes exclusively to "tick-off" the indigenous participation requirement and justify the project. In other words, the participation by indigenous groups was nominal only, while substantive inclusion in the decision-making process was neglected.

According to IR-2, one of the reasons for this situation lies in the business model behind COMRURAL. Because the project follows a co-investment model, and because indigenous communities have been historically poor, they have never been seen by project officials as potential participants.

In contrast to his experiences with the COMRURAL project, he indicated that other WB projects such as the "Nuestras Raíces" project, implemented in Honduras from 2004-2008, were

significantly different when it came to indigenous participation. In the aforementioned project, in which his organization also participated, the respondent described true inclusion in the decision-making process. Additionally, he said that the project was “constructed together” between the WB, Honduran government officials, and the involved principals.

IR-1 is a representative of a different indigenous group called the “Chortís” and also participated in the WB’s consultation processes for the COMRURAL project. His organization, CONADIMCH, was directly invited by the Honduran government to participate in the consultation workshops. He, like IR-2, also indicated that the consultation process, far from having a consultation dynamic, consisted of a socialization process where project documents and requirements were clarified to those interested in participation in the project. He considered that the documents were never open for change. Furthermore, he said that COMRURAL’s officials were aware that without the approval of the region’s indigenous groups, the project would not be approved; that was the reason why his organization was invited to the consultation process.

The organization represented by IR-1 presented a business proposal in the project’s early stages and applied for participation. However, their proposal was denied, and they never participated in COMRURAL through sub-project financing. He believes that they were “tricked” into participation during the consultation stage and were later dismissed by project officials when they were no longer needed. The requirements for participation in the project had already been defined once the consultation stage started, but throughout that stage, agents made it seem as if they were still open for change. IR-1 indicated that he had the impression that the consultation process was aimed towards discovering which requirements were not met by the Chortí people, in order to modify them at a later stage to enable Chortí participation. That was not the case.

Instead, during the consultation stage, his organization was not informed about which requirements they were not able to fulfill for sub-project financing. Consequently, they did not know that they were ineligible for participation. On repeated occasions, officials encouraged the group to continue participating in the consultation stage and asked for their approval of the project. IR-1 expressed a view that the group was given reason to believe that if they did not fulfill the requirements, they were going to receive help in fulfilling them. After presenting their business proposal, they were informed that they did not fulfill the requirements. After the rejection, they lost contact with all WB and COMRURAL officials involved.

Related to IR-1’s experience, MILH’s representative, IR-2, also mentioned that he had knowledge of similar situations in Honduras where indigenous groups had been contacted for consultation processes before project approvals, but once the projects were approved, they were either denied participation or ignored.

Lastly, representatives from another Chortí organization called CONIMCH, IR-3 and IR-4, expressed that they had no knowledge about COMRURAL. They did not know why the WB mentions their organization’s name in the project appraisal documents. According to these representatives, CONIMCH has never participated in any project or consultation process, funded by the WB in Honduras. They argued that they have knowledge of previous experiences where international organizations contact those they referred to as “hidden people,” that pretend to be

indigenous representatives. They do so in order for project officials to be able to report that consultations have been made with indigenous representatives for the purpose of fulfilling the indigenous participation requirements from their organizations. IR-3 and IR-4 also mentioned that they have knowledge of projects from international organizations in which indigenous groups were invited to consultations, though never participated in them. Nevertheless, these groups were mentioned afterwards in completion results reports.

To corroborate this claim, documents regarding the consultation process, such as workshop memoirs or attendance lists, were requested from the WB's office in Honduras but no reply was received. An e-mail was also sent to the WB asking for comments on IR-3 and IR-4's remarks, but no response was received. Even without response from WB officials in Honduras, the independent claims, made by these groups, that detail similar experiences with the consultation procedures of international organizations seem to corroborate each other.

### **RPOs' Principals**

Unlike the indigenous would-be principals, RPOs participating in the project have received direct benefits from COMRURAL through the co-investments made in their businesses. Also, because of their direct participation in the project they have more knowledge regarding the internal procedures regulating the COMRURAL project.

All the interviewees from this category expressed that policy documents in the COMRURAL project were accessible and shared with them since the beginning of the project. When asked about their capacity to propose changes to those documents, they stated that during the first stages of the project, several workshops were arranged by COMRURAL officials, but that the goal of those workshops was only informative. This indicates that the objective was to make sure everyone understood the content of the documents. During those workshops, clarifications were made when asked for, but no feedback about the content of the documents was requested from the participating principals. COMRURAL's officials were in charge of activities during that stage and no principal recalls meeting any WB representatives during that time.

PP-1 and PP-2, both members of APROLAC's board, pointed out that their role regarding the creation of policy documents might be unique because they have had a close relationship with the project's agents. This would set them apart from the general experiences of other RPOs. They argued that their role was different because APROLAC was the first RPO in the dairy-products branch of the COMRURAL project and that their unique situation allowed them to have more influence on the policy documents. They expressed that their opinion had always been taken into consideration for changes within the project, and their feedback had helped shaped COMRURAL both at a regional and a national level. They mentioned some examples of this, such as the requirements regarding environmental licenses and the processes for making purchases; two processes which, in APROLAC's case, resulted in added expenses due to the sector in which they worked. Because of this, and after they had given feedback regarding their situation, the COMRURAL project changed the requirements and procedures regarding both topics and made

them more accessible to future participants in the dairy-products branch. Documents regarding these changes were requested but there was no written record of them.

Nevertheless, as PP-1 and PP-2 expressed, the requirements and policy documents have been constantly adapted, as APROLAC constitutes itself in the COMRURAL project. Consequently, it would not be accurate to consider the changes that have been suggested by APROLAC in the project's policy documents as something that occurred during Policy Development. Instead, APROLAC's case is an example of civil society participation and influence in decision-making organs and is therefore discussed later in this study under its corresponding section.

### **5.3 Transparency Dimension**

This section contains the empirical description of the transparency dimension found in COMRURAL's accountability relationship. The description is divided into three sub-sections corresponding to the three remaining elements analyzed within this dimension: policy content, implementation, and accessibility.

#### **Policy Content**

COMRURAL's transparency policies are found in its Operational Manual. Additionally, the implementing agency, INVEST-H, has its own transparency policies for its employees; these policies apply, subsidiarily, to their employees participating in the COMRURAL project. However, agents argued that the latter policies have never been used through the implementation of the project. In addition to the project-specific policies, COMRURAL agents are bound by all of the WB's guidelines regarding transparency and document disclosure. It could be said that the most important of the WB's policies in this regard is the mandatory publication of all project documents in the WB's project database which is accessible to the public via the internet.

According to COMRURAL's National Coordinator, INVEST-H has a long-standing tradition of always disclosing information to the public upon request. Participation in the project is not a requirement to request information.

It was argued by the agents that the transparency policies of the project have helped change the perception that private banks had towards rural producers in the country. According to COMRURAL's Social Specialist, information disclosure from participating RPOs to the public and to the participating banks has raised the level of trust and encouraged private banks to invest in rural projects across the country. Rural producers participating in the COMRURAL project are now seen as financially transparent and have a greater chance of receiving financing than they had before the COMRURAL project started in Honduras.

Regarding confidential information, there is no information in the COMRURAL project considered confidential according to the project's policy document. The WB's Rural Development Specialist expressed the view that, due to the nature of the project, there has not been any need to classify any document as confidential so far. Nevertheless, the government of Honduras has the

right to request from the WB, or the implementing agency, the non-disclosure of documents if they consider them to contain any information that could be harmful to their interests.

Agents interviewed at the implementing agency's office, INVEST-H, expressed that even though there are no documents considered to be confidential, there is a "work tradition," or "work practice," of not disclosing personal or sensitive information unless the owners of the information agree beforehand to its disclosure. An example of this situation are the balance sheets of participating RPOs. The financial information enclosed in them is considered to be something of interest only to the RPO and the involved COMRURAL project officials. If someone else, besides the aforementioned actor, requests access to such information, COMRURAL officials would ask the RPO for authorization before giving a third-party access to it.

Even though the project's policy papers mention the mechanisms for requesting information, there is no written document with a detailed description of the disclosure process containing timeframes, formats, or costs. COMRURAL's Social Specialist argued that they have learned through project experience that, by avoiding written regulations, they can handle information requests more easily and bureaucratic hurdles can be avoided. This enables them to provide faster responses.

All participants from interviewed RPOs expressed that, for them, the rules are clear enough.

## **Implementation**

COMRURAL does not have one single official in charge of supervising the transparency policies at all stages. Instead, the transparency policies are managed by a team which includes agents from different levels throughout the project. According to the WB's Rural Development specialist, the most important agent in this regard is the Social Specialist assigned to every WB project by its corresponding implementing agency. The Social Specialist is in charge of both the social safeguards of the project and everything concerning transparency. In addition to the Social Specialist, the management team at the WB's national office also assigns an official to directly support him. Both of these officials are the ones in charge of monitoring transparency procedures throughout the project.

The project does not give its officials any incentive to follow the transparency policy because it is considered a work-duty. Interviewed agents referred to the duties mentioned in their work contracts. Special mention was made of the WB's policies and the work-duty of WB officials of keeping record of all documents they work with and having their archive readily available for it to be published in the public online archive. Regarding sanctions, COMRURAL and INVEST-H have policy documents regarding anti-corruption measures and conflict of interest cases which would be used in order to sanction any official that wrongfully denies access to information.

There is no mention, in any of the project's policy papers, of any kind of appeal process for cases in which an information request has been denied. According to COMRURAL's National Coordinator, this is because they have not foreseen any situation in which they would have to deny an information request. At the date of the last interview, all agents expressed that, since the beginning of the COMRURAL project, there has never been a denied information request.

Additionally, they expressed that all information requests are usually concerning practical issues, such as the dates in which the project will be expanded to a certain region, the dates in which new financial support will be made available, or where to deliver documents.

All of the interviewees from participant RPOs expressed that they have never received a negative response to an information request presented by them.

The WB's Rural Development Specialist argued that the lack of appeal processes is balanced out by the fact that principals can directly contact the national office of the WB in Honduras if a COMRURAL official denies them an information request. If such a scenario were to occur, he expressed that WB officials would directly request the information from the implementing agency and, afterwards, forward the information to the solicitant. Up to the date of the last interview, the WB's national office in Honduras had never received any information request about the COMRURAL project. This means that all information requests had so far been handled exclusively by COMRURAL officials.

A special remark must be made regarding the disclosure of information through COMRURAL's website. Such a mechanism is further mentioned on several occasions as one used for the disclosure of information. Nevertheless, through the duration of this study, several documents that were supposed to be in the project's website were searched for and never found. The website does mention a wide array of sections regarding the project but most of these are completely empty. For example, under the "Partnership and Actors" section of the website, four out of the five information tabs relating to RPOs, Banks, etc. are completely empty.



Image 2. Snapshot taken on the 26<sup>th</sup> of May of 2020 of COMRURAL's website which shows a common occurrence within its mechanisms of information disclosure on the Web. Notice how the website only presents a title but no information.

## Accessibility

According to the interviewed agents, all participants in the project are fully aware of the mechanisms to request information. Clarity about the information request mechanisms has been one of the main goals of the socialization workshops carried out since the beginning of the project.

There was a consensus across agents and principals that the current mechanisms to submit an information request need improvement and are often not accessible to all principals due to technical or financial hurdles. The WB's Rural Development Specialist indicated that accessibility entails continuous improvement and COMRURAL has done a good job in integrating new mechanisms as the project develops, such as the creation of e-mail and social media accounts.

The Regional Coordinator for Copán stated that the two main mechanisms to encourage people to request information from the COMRURAL project, since the initial stages, have been:

- 1) Mandatory billboards on every sub-project site with detailed information about the project and contact details.
- 2) An “open offices” policy for all regional coordination offices. Individuals can show up without previous appointment and request information.

Currently, most of the information requests are received through phone calls to COMRURAL's main office landline or via e-mail. COMRURAL's National Coordinator acknowledged that several principals/would-be principals that could be interested in requesting information from COMRURAL are from rural areas in Honduras that have limited access to the Internet or no access at all. Similarly, it is common for the inhabitants of those areas to lack the financial capacity to have a landline or to have a cellphone to make a call. Therefore, it seems very plausible that several people interested in requesting information are unable to use those mechanisms.



*Image 3. Photo of the billboard displayed in the offices of CAEOL, a participating RPO in the COMRURAL project. The billboard includes a phone number for information requests and a description of the project finances.*





*Image 4. Photo of the billboard displayed in the offices of APROLAC, a participating RPO in the COMRURAL project. The phone number for information requests can be seen under the total project funding, after “Para Consultas:”.*

Additionally, A-1, stated that new mechanisms to request information, such as a free-to-call landline and a real-time chat, are being discussed and will be included in the upcoming COMRURAL 2 project. He expressed that the technical and financial hurdles identified in the current mechanisms, are the main issues being addressed in the upcoming project. These new mechanisms would undergo a new socialization process once approved.

Members from a participant RPO mentioned an extra mechanism to request information which is limited to those principals participating in COMRURAL through the sub-project component. APROLAC’s president stated that they direct all of their information requests to the Business Service Provider assigned to them. The Business Service Provider is part of the technical assistance team assigned by COMRURAL to each participating RPO. In their experience, it is this official that is in charge of any information request. However, no other interviewee expressed something similar.

Information about the project’s transparency policies and the processes for filing an information request are thoroughly shared and explained to participant RPOs and are also considered something of public access. Meaning, if any would-be principal wanted to have access to them it would be possible for him to do so. Therefore, COMRURAL agents consider that the process for filing an information request is easily understandable and has been communicated through the appropriate media at their disposal. Participant RPOs and indigenous representatives that have

requested information from COMRURAL also agreed that the information request procedures were accessible and easy to understand.

Nevertheless, COMRURAL's Social Specialist mentioned that some principals/would-be principals could be hindered from having access to project information due to principal-specific problems. He stated that representatives from participating RPOs, or independent persons, attending the project information socialization workshops are asked to disseminate the information to all other members of their organizations or communities. However, he argued that the common occurrence has been that they rarely share the information with anyone else. According to him, this problem concerning information flow within civil society is not something they can address, and representatives from civil society should be held accountable by their own peers for this.

#### **5.4. Participation Dimension**

This section contains the empirical description of the participation dimension found in COMRURAL's accountability relationship. The description is divided in three sub-sections corresponding to the three remaining elements analyzed within this dimension: policy content, implementation, and accessibility.

##### **Policy Content**

Before addressing COMRURAL's participation policies at the implementation stage, it is worth mentioning again some of the participation policies in place before implementation began, for example the WB's consultation policies which regulated participation in the early stages of the project.

The policies that regulated participation in the consultations filtered participation according to the project's design and objectives. Meaning, only principals/would-be principals that had some kind of relation to the project's objectives were considered to participate in consultations. As mentioned in the Policy Development section, due to the nature of COMRURAL as a co-financing project involving private banks, participation requisites have been strict and narrow since the consultation stage and this laid out the foundation for future policies. Consequently, individuals or organizations that do not meet the financial requirements are denied participation.

Project policies make no mention of how the outcomes of participatory processes, such as workshops to request feedback from civil society or the consultation process workshops, will affect project decisions or will be translated into practice. In addition, the Regional Coordinator and Social Specialist both agreed that civil society participation to impact overall project policies is limited and close to non-existent. Participatory processes to request feedback from civil society are rare, but when they do take place, feedback is usually discussed by the project's technicians and officials, and it is up to them to decide which feedback is valid or not.

Regarding the implementation stage, all of COMRURAL's participation policies are found in the project's Operational Manual. These policies focus mainly on sub-project participation; meaning,

the requisites that RPOs have to fulfill in order to enter the COMRURAL project and receive co-financing.

Civil Society's participation in COMRURAL's implementation activities can be divided into three types:

1. **Evaluation-specific participation:** This occurs at evaluations. Both internal evaluations in which RPOs are subject to evaluation, and external evaluations, such as satisfaction studies in which civil society has a more active role.
2. **Decision-making participation:** This occurs through the project's Directive Committee. COMRURAL's National Coordinator stated that civil society has two representatives on the Directive Committee. However, project documents mention only one spot for civil society and no policy reform document stating a second spot was found. This is the best arena civil society has in the COMRURAL project to influence decisions.
3. **Sub-project participation:** This occurs through the RPO's participation in the project by receiving co-financing and executing a business plan. This participation has no impact on decision-making, since principals are limited to fulfilling their business plans and approving the mandatory requirements to continue receiving funds from the COMRURAL project.

Principals and would-be principals can initiate engagement with COMRURAL's project officials in the second and third case. In some cases, the project does not stipulate written criteria or reasons to favor the participation of certain principals over others. However, their participation is always filtered through different means:

- When civil society participation is required at evaluations, usually the participants are selected randomly. Even though participation in evaluations is random, all participating principals and agents have knowledge about when and where they will take place.
- When it comes to participation in the Directive Committee, members from participating RPOs can propose themselves or other members as candidates. Proposed individuals are then presented to the other members of the Committee. The Committee votes and selects the two representatives. The selection of the two members is completely subjective, and the Directive Committee has no criteria to assess the capabilities or level of representativeness of the proposed candidates.
- Participation for funding as a sub-project differs greatly from the previous situations. This participation is regulated and has specific, financial and technical, written criteria that must be met in order for an RPO to participate in the COMRURAL project. The target population is defined, and several requirements have been established to assess who qualifies for sub-project co-financing and who does not. Civil society participation in this third case is approved or denied based on a grading score given by an evaluation committee to each RPO after they request to join the COMRURAL project. If someone does not fulfill the minimum requirements, they are out of the project. According to COMRURAL's National

Coordinator, if someone is denied participation, the officials cannot support them in any way, as doing so would fall outside the project's objectives since COMRURAL's range of action is not so broad.

Regarding the participation of indigenous people, there are conflicting views between agents and principals/would-be principals regarding how to decide which groups, or individuals, are to be considered valid members of an indigenous community. According to COMRURAL's Social Specialist, agents at COMRURAL use the WB's standards to determine who is considered a member of an indigenous community. He explained that these standards judge whether or not:

- (I) the individual lives in a place formally recognized as indigenous territory;
- (II) the individual recognizes himself as a member of an indigenous group; and,
- (III) a native language exists, and institutions promote the differentiated development of that specific group.

Because the indigenous groups in COMRURAL's impact zone do not have their own language, this requisite would be automatically discarded for every case. Nevertheless, written policies regarding indigenous participation in COMRURAL can only be found in the "Social Participation Plan" which states that, in order to be considered a member of an indigenous community, the only criteria to be applied is that of self-determination. Consequently, according to that project document, as long as an individual considers themselves to be someone of indigenous or tribal descent, they should be considered one (World Bank, 2009).

Indigenous representatives believe that the aforementioned criteria for selecting certain groups over others affects their organizations. One of their demands in this regard, is that it should be required for an individual to be a member of a formally recognized indigenous organization for them to be considered an individual from an indigenous group and be granted participation in the COMRURAL project. This issue and its implications for COMRURAL's accountability relationship are further explained in the "discussion" section below.

### **Implementation**

According to COMRURAL officials, there is no official in charge of supervising the implementation of participation policies. However, the WB's Rural Development Specialist argued that the Social Specialist should be in charge of this task.

Similar to the previous dimension, agents in the COMRURAL project have no incentives or sanctions to promote participation since it is considered a work-duty to do so.

If participation is denied, the COMRURAL project has no appeal processes to re-evaluate the decision. However, several alternatives can be used to address the denial. For evaluation-specific and decision-making participation, principals are able to use the ordinary complaint mechanisms that the project has in place.

For sub-project participation, principals/would-be principals can request a detailed explanation of the score they achieved. The minimum score to participate in sub-project financing is 70 points

out of 100. COMRURAL does have a follow-up policy for some cases that do not achieve a 70 score. If an RPO achieves a score between 60-69, they are registered in a database and given instructions on what to do in order to achieve the minimum score. They are also given twenty extra days to fulfill the requirements. If an RPO achieves a score between 50-59 they are also given instructions on how to achieve the minimum score and are encouraged to participate in the next available public calling to participate in COMRURAL.

However, the interviewed agents expressed that sub-project participation is usually denied because of (I) financial constraints which are irreplaceable, or (II) the nonexistence of legal requisites such as environmental licenses, which take several months to acquire, resulting in most cases being dismissed permanently.

For all three cases, there is always the possibility to use the WB's Grievance Redress Service if participation is denied. However, no other agent or principal/would-be principal, besides the WB's Rural Development Specialist, mentioned this mechanism throughout the interviews. In addition, this mechanism is not mentioned in any document concerning the COMRURAL project.

### **Accessibility**

Regarding sub-project participation, the information about the project's participatory mechanisms is socialized mainly through public calls to participate in COMRURAL. These calls to participate in sub-project financing are done through national media such as newspapers, web pages, radio and television. Agents noted that it is also possible to have closed-participation calls during which the approved sub-project financing is limited to a specific business sector. In these situations, the information is shared directly with potential participants. Additionally, workshops to explain the project's policy documents and objectives are organized in strategic points defined by the Regional Coordinators. These have proven the most useful for securing sub-project participation.

None of the interviewed RPO members had any complaints regarding the manner through which information about the project's participatory mechanisms, for sub-project and evaluation-specific participation, has been shared with them, and consider that such documents are easily available.

Nonetheless, this was not the same for the interviewed indigenous would-be principals who expressed that they have never seen any public call to participate in the project and had never received information about participation in COMRURAL after the end of the WB's consultation stage. Additionally, MILH's representative expressed that the criteria for filtering indigenous participation has never been communicated to them and is not available.

Regarding decision-making participation, out of the seven interviewed principals/would-be principals, only one had knowledge about the Directive Committee and its role. Concerning this, he expressed that, even though he knew about its existence, he had no knowledge regarding how to participate on it and added that such information is not available to the public.

Civil society participation in the COMRURAL project rarely took place prior to or during decision-making processes. Besides some exceptions found in APROLAC's participation within COMRURAL, all of the participatory cases for civil society reported in this study occurred after decision-making.

According to COMRURAL's National Coordinator, even though there are no written criteria to select who will be a Civil Society representative on the Directive Committee (The highest decision-making organ civil society has access to), he believes there is a common understanding among all members of civil society that they have the opportunity to participate in it. He argued that in those cases where civil society does not participate, this is due to lack of will to do it and not because of technical or financial hurdles. Regarding participation in sub-project financing and evaluations, he argued that written requirements for those cases are strict and do not suppose a constraint for participants but should instead be viewed as a necessary filter to fulfill the project's goals satisfactorily.

The indigenous representative from CONADIMCH, IR-1, did not agree with the previous claim. According to him, the indigenous populations in Honduras suffer from several constraints every time they attempt to be involved in COMRURAL's participatory processes. He argued that there is **unequal access opportunity** between indigenous populations and other members of civil society due to financial constraints that were known to WB agents before the project was implemented.

IR-2, representative of the Lenca population, argued that, for his indigenous community, all attempts to participate and to apply for sub-project financing have been the result of their own initiative. So far, these efforts have been unsuccessful due to financial restraints.

## **5.5 Evaluation Dimension**

This section contains the empirical description of the third accountability dimension analyzed in COMRURAL's accountability relationship, evaluation. In a similar manner to the previously discussed dimensions, the description is divided into three sub-sections corresponding to the three remaining elements analyzed within this dimension: policy content, implementation, and accessibility.

### **Policy Content**

COMRURAL's evaluation policies are found in the results frame defined by the WB before project implementation. These policies are used by the WB to carry out the mid-term evaluation and the implementation completion evaluation; both of which have been used as sources of information for this study.

In the COMRURAL project, it is also possible to identify an additional form of evaluation which entails those made about RPOs, to determine if they can enter the project and have access to co-financing. The policies for these latter evaluations are found in the project's Operational Manual.

In both cases, evaluation objectives and criteria are communicated beforehand to participating principals and agents. Once it has been decided that an evaluation will take place, evaluation guides are prepared and shared with the involved principals and agents with enough time in advance for them to be ready for the evaluation. Interviewed RPO principals expressed great satisfaction regarding the communication of evaluation objectives and criteria.

### **Implementation**

The COMRURAL project has a special unit in charge of all evaluations. This is called the “Monitoring and Follow-up” unit. This unit is comprised of two officials from the COMRURAL project and an official from the implementing agency, INVEST-H. These three officials, together with the national project coordinator, are in charge of monitoring evaluations and overall project progress according to the results frame. They are also in charge of following up all the financing given to the sub-projects and the fulfillment of sub-project requisites to continue receiving co-financing. Additionally, this unit is in charge of assessing and defining the terms of reference for satisfaction studies and evaluations to be applied within the project. This unit is considered highly technical, and because of that it, does not contain any civil society participation.

Regarding the implementation of evaluations, it was argued by the WB’s Rural Development Specialist that participation of principals/would-be principals in evaluations is a top priority for their national office because “on-field” feedback is highly valuable to design future projects or to redesign active ones. It is because of this that WB officials make visits twice a year to COMRURAL’s project-sites.

However, that claim seems to be contradictory to how evaluations are carried out. Even though principals from participating RPOs are involved in evaluations, in all of the aforementioned cases, they are limited to being subjects of the evaluating agents. RPO’s principals expressed that evaluation participation is usually limited to members of the RPO’s directive board. Additional participation of principals/would-be principals could occur in mid-term evaluations if additional principals/would-be principals are invited to participate in focus groups, are interviewed as key actors, or during field trip visits made by COMRURAL officials. However, in these two cases their role is also limited to being the subjects of the evaluations. The members from one of the interviewed RPO’s, APROLAC, were the only principals who expressed that they do not consider themselves subjects of evaluations but rather active participants.

In addition to the previous claims, it is stated that agents from the COMRURAL project are obliged to do periodical auto-evaluations about themselves and civil society has no kind of participation in that process.

Since there is no civil society participation, the project does not have any appeal processes for situations in which principals/would-be principals feel they have been denied participation to the evaluation process. All board members from interviewed RPOs expressed that they had no knowledge about the possibility of appealing evaluation results.

## **Accessibility**

Information about the project's evaluation policy, evaluation participation, and results are easily available to principals participating in the project. Nevertheless, this information might be too technical to understand at first. According to CAEOL's president, PP-3, it was hard for members of his organization to understand the evaluation's procedures and criteria until they received help from COMRURAL's agents. Project officials assigned a technician that helped them understand the evaluation information. CAEOL was also invited to participate in workshops, organized by COMRURAL, through which the details concerning evaluation procedures were explained. It can be argued that through that kind of additional support, the agents from the COMRURAL project have been able to communicate evaluation information in an appropriate form.

However, the situation is different for would-be principals that are not participating in the project. IR-2, MILH's indigenous representative, expressed during his interview that indigenous communities had no access to information regarding COMRURAL's evaluation policies. He stated that his organization has been interested, for many years, in participating in evaluations of COMRURAL, but they do not know when they will take place, how they will be implemented, or who is involved in them.

Project evaluations are recorded and published on the WB's website for public access. This has been corroborated by accessing the WB's website. Additionally, when interviewing MILH's indigenous representative, IR-2, the interviewee mentioned several times that he used the WB's online archive to gather information about COMRURAL's mid-term evaluation.

COMRURAL's Social Specialist mentioned that COMRURAL's own evaluations are also published on the web but, after inspecting the website, it was impossible to locate such documents. In contrast to the Social Specialist's claim, RPOs members stated that evaluations involving them are confidential. It is apparent then, that access to COMRURAL's evaluations involving a specific RPO would require authorization from the involved principals before disclosure. That is in line with the claims regarding confidentiality made by the National Coordinator of the COMRURAL project.

Even though civil society participation in the process is limited to being subjects of evaluation, it has been identified that COMRURAL's officials aid them, when needed, by providing more detailed explanations or being flexible with evaluation times, in order to carry out successful evaluations. Interviewed RPOs' members expressed that they have never experienced any technical or financial constraints that limited their participation in an evaluation.

## **5.6. Complaint and Response Mechanisms Dimension**

This section contains the empirical description of the last dimension analyzed in COMRURAL's accountability relationship, Complaint and Response Mechanisms. Once again, the description is divided in three sub-sections corresponding to the three remaining elements analyzed within this dimension: policy content, implementation, and accessibility.



## **Policy Content**

COMRURAL's policies regarding complaint and response mechanisms are found in the project's "Complaint Document". All of the information presented in this section regarding the complaint mechanisms and the content of the "Complaint Document" come from interviews, as the aforementioned document was neither available through the project website nor through communication with officials. In addition to the Complaint Document, the WB's standard complaint policies such as those regulating the Grievance Redress Service, or the Integrity Vice Presidency, could be applied if needed according to each individual case.

Agents from the COMRURAL project stated that complaints can be done at any stage of the project and in relation with any activity. Additionally, complaints do not require an identity for it to be processed; meaning, these can be confidential. Interviewees acknowledged that, because of the country's conditions, there is a need for confidential mechanisms since principals/would-be principals often refrain from submitting a complaint due to fear of retaliation. Nevertheless, the project has no written policy regarding confidentiality and, even though they have received confidential complaints, such cases have been solved solely based on the confidence between the complainant and the involved officers, without following any specific confidentiality rules or policies.

The nonexistence of written confidentiality rules in COMRURAL's policy documents could be limiting the amount of complaints received. Even though the interviewed agents expressed that, if requested, they would respect the confidentiality of complaints, no interviewed principal/would-be principal had knowledge about this being an option. Moreover, MILH's indigenous representative, IR-2, expressed the belief that "several actors throughout the implementation of COMRURAL have restrained themselves from complaining because the project does not have any confidential lines to submit complaints".

Furthermore, the project does not have written policies regarding non-retaliation for complainants. This issue was addressed by MILH's indigenous representative. IR-2 argued that participant RPOs and other people with intentions of participating in COMRURAL, such as indigenous communities, are demotivated from presenting complaints about the project because this could mean that they will either stop receiving co-financing or that they will be denied entrance to the project. This claim is relevant to the COMRURAL project due to its design, in which participant RPOs receive co-financed funds over long period of times. The funds are made available through installments; meaning, each disbursement is dependent on fulfilling the objectives established for the previous one. Principals could be afraid and restrain themselves from submitting complaints because, without a written non-retaliation policy, that could mean that they are more likely to fail future evaluations made by COMRURAL's officials. Consequently, they would lose access to the remaining funds.

A hypothetical example of this situation was presented by IR-2. IR-2 stated that three organizations affiliated to MILH were currently going through the application process to be participants in the second stage of the COMRURAL project. He argued that, in the hypothetical case that one of these organizations had to present a complaint about something occurring in the project, members from the other two organizations, or from MILH itself, could feel that the submission of that complaint

would lower their chances of entering COMRURAL. Therefore, the lack of a no-retaliation policy opens the possibility for situations in which principals/would-be principals demotivate others from making use of the complaint mechanisms.

At the moment of conclusion of all of this study’s interviews, the project lacked a clear description of the complaint mechanism procedures. COMRURAL’s National Coordinator stated that there was a team working on making a systematization of all the stages of the complaint process, from the presentation of a complaint until its resolution. However, this systematization would not be ready for use anytime soon. Therefore, he expected it to be incorporated into the foundational documents required to implement the second stage of COMRURAL (Also referred to as COMRURAL 2).

### Implementation

In the COMRURAL project, the complaint and response mechanisms are not supervised by one exclusive official but rather depend on the “input-route” used by the principal/would-be principal.

If any complaint is received through one of INVEST-H’s mechanisms, which are independent from COMRURAL, it will be resolved by INVEST-H’s communication and public relationships team. Within COMRURAL, depending on the “input-route,” the complaints will be handled by the Social Specialist if received by phone or at one of COMRURAL’s offices, or by the project’s webmaster if they are received via e-mail or social media. After receiving the complaint, both of these officials are responsible for forwarding the complaint to the corresponding Regional Coordinator or to the National Coordinator.

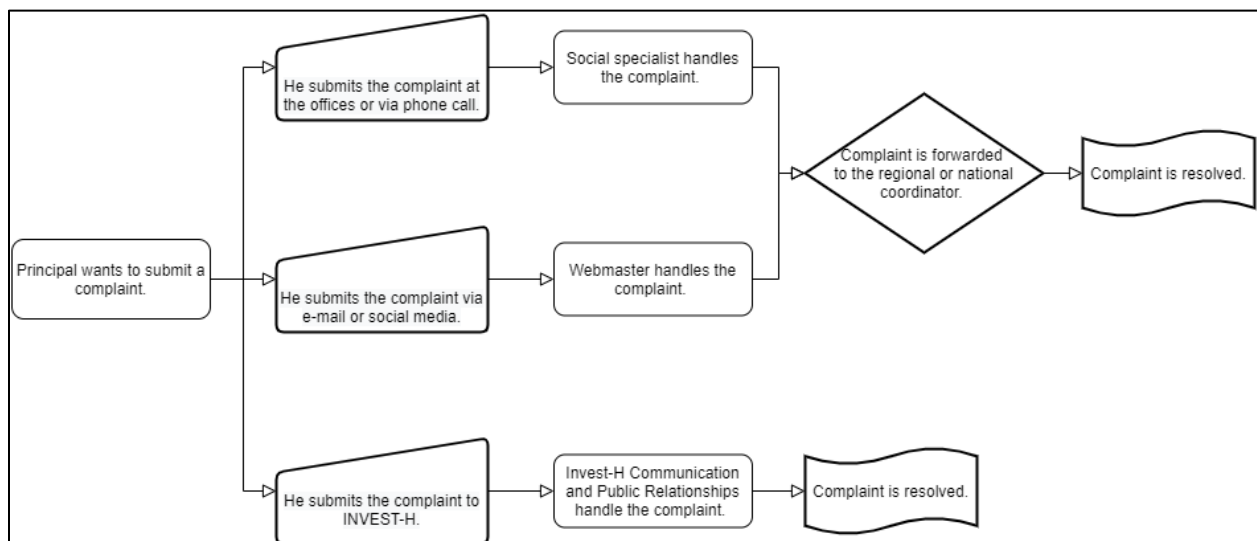


Figure 6. Flowchart of COMRURAL’s complaint mechanisms. Note that no appeal process is shown because this is inexistent.

Interviewed agents argued that complaints are usually confused with technical issues and are therefore solved on the field by the project's technicians. Therefore, most issues never reach any of the complaint mechanisms mentioned before.

This complex web of responsibility, and the fact that a detailed description of it is nonexistent, might be among the reasons why some interviewed principals/would-be principals stated that the COMRURAL project has no officials, team, or unit responsible for handling complaints.

Complementary to the work done by the COMRURAL officials, the WB's national office in Honduras has a routine check of their projects' complaint systems. This is done every six months and all of the received complaints are archived and reported for every project. As a general rule, the implementing unit is the responsible for solving any complaint. But, in cases of complaints regarding fraud or corruption, the WB's office will step in and it is up to the WB's regional and national purchase teams to assess whether or not there has been a misuse of funds. Additionally, if the complaint is about a member in the WB's national office, or if principals suspect that a complaint has been mishandled, the case can be taken to the WB's Integrity Vice Presidency which "is an independent unit within the World Bank Group that investigates and pursues sanctions related to allegations of fraud and corruption in World Bank Group-financed projects" (World Bank). In this last stage, if a misuse of resources is proven, money must be paid back to the WB and the national government risks having all of their project portfolio suspended until the payment has been made. The WB's Rural Development Specialist stated that, to his knowledge, no complaint in the national office has ever reached such stages.

COMRURAL has no system of incentives or sanctions to ensure promotion or compliance of the complaint and response mechanisms. Additionally, the COMRURAL project has no appeal processes for either party, principal/would-be principal or agent, in case one of them feels that the complaint's resolution is not correct.

Instead of having an appeal process, COMRURAL's National Coordinator argued that principals have the opportunity to start the complaint process all over again if they have acquired new information that could overturn the previous resolution. However, this new complaint would again be investigated and solved by the same agents.

Additionally, even though it is not an appeal process, it is acknowledged by COMRURAL officials that principals are able to take their complaints directly to the WB's office in Honduras if they feel that the implementing agency has wrongfully solved their complaint. In contradiction to this, WB's officials expressed that, at the WB's national office, there is an expectation that all complaints will be solved immediately by agents from the implementing agency and these should not reach the WB's office.

The people involved in receiving, investigating, and solving the complaints in the COMRURAL project are not independent from the project officials. Complaints will usually be solved by the regional or national coordinator, both of which are agents involved in most areas of the project. In regard to this aspect, the indigenous representative from MILH, IR-2, expressed that it was highly improbable for an affected individual to submit a complaint about the COMRURAL project to the same office handling the project. He believed that this enabled officials to justify their actions and

dismiss valid complaints. He further argued that having independent officials handling the complaints was necessary, and that complaint mechanisms should be advertised to civil society in order to disseminate information and confidence in the procedures, in turn reinforcing the importance of submitting complaints.

Corrective or preventive actions are not considered within the COMRURAL project's complaint and response mechanism policies. At the WB's national office, WB's agents expressed that harm reparation is not part of the organization's obligations. According to the WB's Rural Development Specialist, it is up to the national government to decide if harm reparation is needed and who is responsible for it. He stated that if a complaint involves harm being caused, the implementing agency and the WB would suggest to the affected people to follow up the complaint with legal action. After doing so, local law should be applied by the judiciary system to determine any form of harm reparation. When it comes to corrective actions, the WB limits itself to demanding money back from the government in cases of proven corruption; this has no effect on principals in any way.

Indigenous representatives are aware of these harm reparation policies and consider that, if international organizations are not responsible for corrective actions, they are consequently leaving indigenous communities in a disadvantaged situation. MILH's indigenous representative, IR-2, argued that whenever redress mechanisms are left to be handled by the Honduran judiciary system, indigenous communities face financial limitations. He holds this view because indigenous organizations lack the financial capacity to hire lawyers in order to pursue criminal or civil responsibility in a court of law.

Financial capacity for these cases is a hurdle because, due to the immense delay of trials found in Honduras' judiciary system, lawyers request high fees to take a case against the state. The long waiting time before any resolution is given will often render the harm reparation inefficient and extemporaneous. If legal support was included as part of COMRURAL's responsibilities concerning complaint mechanisms, this would help principals overcome hurdles like the ones mentioned by MILH's representative.

Lastly, in the COMRURAL project, complaints are archived but not systematized or analyzed for future use.

### **Accessibility**

Information about the project's complaint mechanisms are given to participating RPOs once they enter the project. However, CAEOL's and APROLAC's presidents expressed that they had no knowledge about any complaint mechanism inside the COMRURAL project. They both mentioned that it was possible that their ignorance regarding complaint mechanisms was because they had never had any need to present a complaint so far.

As previously demonstrated, the project has several mechanisms through which principals/would-be principals can present their complaints, increasing accessibility. Even though financial hurdles to use such mechanisms have been acknowledged by the interviewed agents, COMRURAL's

Regional Coordinator for Copán considers that the mechanisms through which complaints are presented are appropriate and fulfill the minimum requirements for the project. He also argues that, even though the mechanisms are in place and functioning, they have never received any complaint in the project which demonstrates that the project officials, and its participants, have fulfilled all their tasks efficiently. Mid-term and implementation completion evaluations prove this, according to him.

Interviewees, in discussing diffusion strategies used to raise awareness of complaint mechanisms, emphasized the importance of the installation of mandatory billboards in every sub-project location. These billboards include COMRURAL's website and phone numbers which can be used to present a complaint and to request information. All agents and participant principals mentioned these billboards in their interviews.

The requirements for filing a complaint do take into account the capabilities of the complainants. Since the impact zone of the project is characterized by low levels of education and high degrees of illiteracy, complaint mechanisms have no strict or formal requisites. Complaints can be presented written, with no format at all being required, or orally at any of the project's offices.

Regarding this topic, MILH's indigenous representative, IR-2, expressed concerns about how oral complaints are handled. He mentioned that indigenous communities usually present their complaints orally because they have several members who are illiterate. Because of this, they have experienced cases where complaints are dismissed without being solved and no written registry is ever recorded at the corresponding office. Consequently, it would seem in those situations as if no complaint has ever been submitted. Because of this, IR-2 considers that COMRURAL should have at least a minimum set of safeguards when it comes to oral complaints.

According to COMRURAL's Social Specialist, even though they have no knowledge of any case in which a principal/would-be principal was unable to file a complaint due to technical or financial constraints, new mechanisms should be implemented to make complaint procedures more accessible, and also to address the lack of trust and fear to complaint found in Honduran culture.

Lastly, the WB's Rural Development Specialist mentioned that the WB's national office in Honduras has received two complaints directly to their office throughout the implementation of the COMRURAL project. However, both complaints were redirected to the implementing agency because they were not complaints, but rather information requests concerning the availability of funds.

## Chapter 6. Discussion

This chapter discusses the described empirical reality in the previous sections and how it relates to the theoretical propositions laid out in the beginning of this study. By doing so, it is possible to pinpoint accountability gaps found in the project's accountability relationship.

After a brief general discussion regarding COMRURAL's accountability relationship, this chapter includes several sub-sections that discuss dimension-specific details that led to accountability gaps in the project. These specific sub-sections give richer details concerning the role of agents and principals/would-be principals and how they are impacted by the identified gaps.

As a starting point, it can be argued that the empirical reality of COMRURAL's accountability relationship exemplifies perfectly the would-be principal dilemma. This entails having agents who believe they are not supposed to be held accountable by certain actors, while at the same time that specific group of actors are demanding some type of accountability from them. Throughout this study's data collection, agents have made reference to the project's objectives and how these limit their responsibility. Because of those objectives, agents have stated that they consider indigenous communities to have no form of accountability relationship with them due to their lack of financial capacity to meet the requirements of the project. However, those same indigenous communities, which are considered to be outside of COMRURAL's accountability relationship according to the project's agents, have demands regarding COMRURAL's implementation and arguments to substantiate why they should be entitled to some degree of accountability. According to the indigenous communities, since the project is being developed in the region where their communities are located and because they participated in the WB's consultations before project implementation, they are entitled to accountability. These contradictory claims make the would-be principal dilemma visible in COMRURAL's accountability relationship.

COMRURAL's accountability relationship shows varied levels of strengths and weaknesses across all the dimensions that have been analyzed. Consequently, it is possible to argue that the project's accountability relationship demonstrates that the elements laid out by the GAP Framework are all mutually reinforcing and complementary, but not indispensable for an accountability relationship to function at a minimum level.

This claim can be corroborated by looking at the project's transparency dimension which is lacking some elements to be considered fully accessible but has never posed a significant implementation constraint or caused any harm to principals/would-be principals. From the interviews, it is possible to state that, when asked, interviewees agreed that the COMRURAL project has been transparent. This is because, even though it is possible to point at some situations in which interviewees stated that information was, at first, not available to them, all respondents had knowledge of other mechanisms through which they later inquired or through which they could have done so if they wanted to.

Interview data has also demonstrated that, in COMRURAL's accountability relationship, there is a high level of asymmetry of information. This was less noticeable in the agents, but very common and in larger dimensions, among principals and would-be principals; especially among the

members of indigenous communities. Two examples of this would be that, during the interview process, it was common for interviewed principals/would-be principals to confuse the WB for the Interamerican Bank for Development or the European Commission Aid; and for agents, the fact that, on some occasions, they had conflicting statements regarding who was responsible for what within the project.

This asymmetry of information could be linked to a prominent characteristic of this project's accountability relationship: the **common occurrence of having unwritten policy details**. Topics such as confidentiality, incentives for officials, participation procedures and filters, and non-retaliation are all considered to be present in the project, as stated by agents and principals, but no policy document mentions them. This generates an asymmetry of information because, according to the experiences collected for this study, unclear and subjective rules are applied on a case by case basis by agents. This impacts agents, as it makes it difficult for them to know the limits of their duties. It impacts principals/would-be principals because expectations can emerge from previous experiences and, whenever they are not met, they do not have any document or reason to substantiate further complaints.

Furthermore, it is possible to point out two other characteristics in this accountability relationship that are significant to the study. These are the delegation and diffusion of accountability among agents and the overall lack of appeal processes throughout all of the project's accountability dimensions. These two issues are discussed independently in upcoming sub-sections.

Lastly, in all studies there is a possibility to encounter an "outlier" case. This means, a case or situation which greatly differs from the average trends in a phenomenon. In this study, APROLAC's case, as a participant RPO in COMRURAL, can be considered an exception which would require further inquiry to fully understand why their experience in the project has been so different than those detailed by other RPOs. An example of this is how board members from APROLAC expressed that, throughout the project, they have had direct contact with the WB around four to five times. Additionally, they have received field visits from WB officials together with representatives of donor states, and they have met with WB officials when invited to special occasions such as the project's closure for COMRURAL's first stage. Even though the members from APROLAC have had a very close relationship with agents from the WB, most interviewed principals indicated that they have never had contact with anyone from the WB. Therefore, APROLAC's experiences were outside of the normal range encountered in the project. Because APROLAC is considered an exception, a comparative analysis about its influence in decision-making within COMRURAL is discussed in a sub-section ahead.

## **6.1. Distance and Delegation of Accountability**

COMRURAL's principals from participant RPOs expressed that agricultural producers, like them, faced several difficulties in the field which are difficult to comprehend for agents that are disconnected from such reality. In order to address this concern, international organizations, such as the WB, resort to the delegation of responsibilities. When looking at COMRURAL's organizational structure, this is easy to visualize. COMRURAL has a structure which delegates

responsibilities at different levels. This is an attempt to make it easier for project officials to understand what the participants are doing and increase the “on the field” experience from their technicians, while at the same time communicating their experiences by reporting to higher level agents. This delegation occurs through the use of regional offices, distinct from national coordination. Further delegation is enacted by regional offices assigning specialized technicians to each project in the region.

Nevertheless, if this structure is utilized exclusively to solve technical issues, as it is in the case of COMRURAL, and does not integrate communication mechanisms, it also represents an accountability barrier due to the distance that it generates between officials at the higher levels of the project and members from civil society participating at the lowest levels.

A dilemma emerges in this situation. On the one hand, the chain of delegation helps to provide more efficient responses to technical issues. On the other, this creates a barrier between the WB and principals/would-be principals in the field. This aforementioned dilemma is based on the experiences expressed by principals and would-be principals interviewed for this study. Their claims regarding the lack of accessibility to WB officials and consequent lack of influence in decision-making, point towards an accountability gap which needs to be addressed without sacrificing the project’s ability to efficiently respond to technical fieldwork complications.

Empirical details of the benefits and drawbacks of this delegation can be seen in principals’ relationship with project technicians and how they contrast them with their relationship with WB officials.

The president of CAEOL, PP-3, stated that, even though the RPO’s board and the organization’s members have been informed that the World Bank is active in the project, they have never had any relationship with them throughout their involvement. He recalls that the only situation in which his organization met a representative from the WB was during one of the yearly evaluations done to CAEOL. In that evaluation, the WB agent was together with the other members of the evaluation committee.

In contrast with that relationship to the WB, all participant RPOs interviewed for this study reported that they have a close relationship with the technical assistance team assigned to them by the COMRURAL project and meet with them at least twice a month. They also expressed that they would be more comfortable addressing any information request or complaint directly to members of that crew, instead of officials from COMRURAL’s offices or from the WB’s national office. CAEOL’s president added that, in his opinion, the only contact between his RPO and the COMRURAL project is the designated technician; there has never been any relationship with agents “above” the designated technician. Even would-be principals, such as indigenous representatives, acknowledged that the COMRURAL project has a lot of technicians for different fields, and that these technicians were usually highly accessible for civil society, including themselves.

Furthermore, according to the experiences from the interviewees, document content, and the organizational structure of COMRURAL, it is easy to conclude that relationships between principals and agents rarely go beyond the regional office level, if they get to that level at all. Any



information request or complaint that would reach the central offices would be considered an extraordinary case. In addition to the technical assistance team, every regional office also has specialists assigned to them (E.g. finances specialist), and it is common for principals to direct their requests/complaints directly to them as well.

It would seem that civil society members are satisfied by the technicians' role, but they have also pointed to the technicians' lack of capacity to influence decision-making. Both participant RPO members and indigenous representatives indicated that having access to technicians in order to submit complaints or to suggest changes in the project was not useful, often because technicians were at the same level as civil society members regarding their capacity to influence decision-making. Therefore, it would seem that they consider technicians as their peers at the lowest level of the project.

When assessing the effects this type of delegation has on principals/would-be principals, the largest impact would seem to be isolation from decision-making. Several principals stated that they felt there was too much distance between the participant level and the WB and blamed that distance as the main cause of their inability to pursue changes in the project or give feedback. An example of this is CAEOL's president, who, during his interview, specifically argued that the main reason for his organization's lack of capacity to influence decision-making processes was the long chain of delegation found in the project.

This raises interest for further studies to assess the effects that this distance, and previous project experiences, have on participants' expectations and self-conception regarding their role when engaging with international organizations. All of the interviewed principals argued that, even in the hypothetical case of them being able to somehow reach high-ranking officials to propose changes in COMRURAL, their capacity to influence a change in the project was, for most of them, nonexistent for the time being. This self-conception of individuals as not being able to influence decision-making could further limit the accountability relationship in the future if new mechanisms to incorporate civil society in decision-making are implemented, but members from civil society refrain from using them.

Another problem, apparently inherent to delegation, relates to would-be principals. Indigenous representatives from the Chortí people, IR-3 and IR-4, expressed that this kind of delegation to local governments was detrimental to their communities' rights. They argued that when international organizations delegate projects to local actors, supervision capacity is diminished. In Honduras, local governments have a history of not respecting indigenous rights. According to the respondents, international organizations are more cautious than local governments when it comes to complying with implementation regulations that involve indigenous communities and respecting their rights. They believe that the local government, in the Honduran context, ignores several international regulations because their political power usually trumps law enforcement.

No documents or experiences supporting this claim were found in COMRURAL's accountability relationship. However, the fact that indigenous representatives pinpoint such a specific situation could be the basis to study the impact that a country's regime or legal culture can have on an accountability relationship.

Additionally, this claim directly addresses internal accountability issues, including the choice of mechanisms used by international organizations to ensure that implementing agencies, or borrowing governments, respect the rights of indigenous communities. At the same time, it provides insight into a situation involving reciprocating accountability between a government and an international organization. It would seem that indigenous communities are more comfortable demanding accountability from their government through an international organization than by doing so through their country's own judicial system.

## **6.2. Lack of Appeal Processes**

In the operationalization of accountability relationship used for this study, there are certain characteristics which should be constant across all the dimensions of a theoretical accountability relationship. One of these concerns the ability that principals/would-be principals should have when it comes to appealing decisions made by agents if they feel as though that decision impacts them. This means that appeal processes should be found in all policies regarding transparency, participation, evaluation, and complaint and response mechanisms.

The possibility of appealing a decision was therefore expected to exist in situations concerning all the dimensions of COMRURAL's accountability relationship. This entails (I) situations in which access to information has been denied, (II) situations in which participation has been denied, (III) situations in which input to evaluations has been denied, and lastly, (IV) situations in which a complaint resolution has been decided.

These appeal processes are relevant for an accountability relationship because they allow for corrections in situations where actors were left out of decision-making processes but later realize that a specific decision is affecting them. If their input was not considered, they would have the chance to appeal the decision and express themselves through that process. Therefore, appeal mechanisms become relevant for situations involving would-be principals, since they are the most vulnerable to the aforementioned scenario.

Additionally, appeal processes give principals/would-be principals an active role in an accountability relationship since they can pass judgement on agents' actions and decide whether or not to appeal them if they find any irregularities. Consequently, if appeal mechanisms are in place, one could expect for agents to take principals/would-be principals feedback into account, and facilitate or promote their participation, in decision-making in order to avoid going through an appeal process which would revise their decisions at a later stage.

The nonexistence of a single appeal mechanism throughout all of COMRURAL's accountability dimensions could be considered the project's most significant accountability gap from a theoretical point of view. Nevertheless, it is surprising to note that, after analyzing all of the data collected for this study, it has not been possible to identify an empirical situation in which the lack of an appeal mechanism directly affected a principal or would-be principal. Even though there are situations in which an appeal mechanism would have proven useful, these situations usually (I) were resolved through other means or (II) had causes rooted in other elements of the project that would render an appeal process useless. An example of the first scenario is that of a denied information request

that could theoretically undergo an appeal process. In COMRURAL's case, the information request can be submitted again with new details or be requested directly to the WB's national office and agents would have to justify the denial. Even though this situation might seem like an appeal process, it is not formally recognized as being one in any policy document. Examples of the second scenario include cases when participation in the project is denied. For such scenarios, an appeal process would be beneficial for principals/would-be principals. Nevertheless, the project's empirical reality also demonstrates that the root of denied participation is the lack of influence these actors had in the policy development stage and in the decision-making organs which set the requirements for participation. Consequently, without addressing those two issues first, an appeal mechanism would be inconsequential and yield the same result.

In defense of a lack of appeal mechanisms, COMRURAL agents argued that they have not been needed. This argument raises concerns about COMRURAL's accountability relationship because it gives an insight into the agents' preferences regarding policy development and implementation. It would seem that policy development follows a **corrective nature** rather than a **preventive** one. This indicates that they do not consider it their duty to implement mechanisms that can further enhance accountability unless they faced a real-life situation in which such mechanisms were needed and not available. Only the emergence of such a scenario would then justify the creation of new mechanisms that address the accountability gap; however, these new mechanisms would only be applicable for future situations.

Similar to the situation described in COMRURAL's case, at the WB's national office there has never been any situation in which a complaint had to undergo an appeal process. However, contrary to the way appeals are handled by the implementing agency, the WB's national office does have a detailed policy description and appeal process for cases in which their involvement is requested. Unfortunately, as explained previously, complaint cases rarely move beyond the regional level at COMRURAL, so the WB's mechanisms are not known among participants. It is unclear why the WB's policy of having appeal mechanisms in place before they are needed, has not been communicated to the implementing agency.

### **6.3. Policy Development: Consultation or Socialization?**

The empirical reality of the first element of this study's accountability dimensions, policy development, shows the need for more detailed descriptions and mechanisms regarding the participation of civil society in the creation of policy documents for projects such as COMRURAL.

It has become clear that, in COMRURAL's accountability relationship, there are contrasting understandings regarding the mechanisms needed for the policy development element. These contrasting understandings can be summarized as a difference between agents and principals/would-be principals regarding what constitutes **effective participation**. Agents seem to favour the use of socialization processes, through which the goal is to communicate previously defined documents and ensure that all members of civil society understand them, before the project starts its implementation stage. On the other hand, principals/would-be principals seem to favour mechanisms which require their consultation before approving any policy document. These

consultation processes would allow changes to be proposed to policy documents and, once these changes are introduced, members of civil society would be consulted regarding their approval once again. As explained before, the difference between socialization and consultation processes for this study refers to the opportunity principals/would-be principals have to give feedback about project documents and achieve changes in them. Achieving change in policy documents is possible under consultation processes but impossible under socialization processes.

Under the agents' socialization process, a vertical method of policy development is used. Through the socialization methods preferred by agents, policy documents are discussed and created by high ranking officials, such as specialized technicians, and are afterwards socialized to other actors below their level. After doing this, the documents continue flowing down the structure with *full understanding of the creators' logic and motivations behind the documents* as the main goal. Here, civil society is at the end of the documents' path and their **participation is limited** to being a passive recipient of the content of the documents. There is nothing that limits the actors at different levels from providing feedback or proposing changes but whether or not their input will achieve a change is dependent on the information-giver's ability to influence those making decisions above their own level. Additionally, it must be noted that collecting feedback is not usually a task assigned to the agents in charge of the socialization process; doing so would be an extra effort from their side.

Without (I) a clear systematization of feedback, or (II) policy documents stating how feedback should be handled and what results that feedback should have, it is difficult for civil society to impact the policy documents' content. Usually, if the two aforementioned characteristics are not present, whenever feedback reaches any higher officials, it is entirely dependent on the discretion of the official whether or not to consider it. This last statement best describes what is happening in COMRURAL's accountability relationship.

In opposition to such socialization methods, the principals/would-be principals of the COMRURAL project preferred consultation methods in which policy documents require their approval before they can be considered final. This method follows a horizontal logic in which agents and principals/would-be principals engage in a common arena, with the same degree of decision-making power, to decide the content of policy documents. Once all actors involved in this arena are satisfied with the documents' content, these are approved, and the remaining stages of the project can start. This method **enhances participation** for members of civil society but can be a hazard towards a project's deadlines and goals.

Consequently, a mix of both methods would prove more beneficial for international organizations. By ensuring proper socialization of documents, an international organization can know for sure that members of civil society participating in their project have full knowledge of its policies. By introducing consultation methods, members of civil society engaging in a project are more able to influence decision-making and ensure more **effective participation** in the early stages of a project.

COMRURAL's case is an example of a project which focuses almost exclusively on socialization methods. This has consequently generated accountability gaps. Several principals/would-be principals do not feel that the project's policies accurately reflect their needs and have expressed

that effective participation in the policy development stage never occurred. Additionally, members of indigenous communities have indicated that the feedback given during the policy development stage has never been followed up. These situations point towards a gap in the flow of information from members of civil society up to the decision-making arenas of high-ranking officials. It also reveals an accountability gap concerning the lack of regulations to determine what action should be taken in regard to the submitted feedback.

By comparing COMRURAL with other projects considered to be more “consultation-driven,” (E.g. The “Nuestras Raíces” project mentioned by IR-2) it would be possible to further understand the advantages, disadvantages, and results from each of these opposing methods.

Lastly, it must be noted that this study’s analysis of the policy development stage is limited due to the nonexistence of historic documents, including systematizations of the early consultations made by the WB for the COMRURAL project. Even though these documents were mentioned by several interviewees, access to them was never granted by the agents in charge. Therefore, the described empirical reality and this discussion are based on the normative aspect of early policy documents which define *what should have occurred* in the policy development stage and the interviewees’ *perception of how the policy development stage actually occurred* when they participated in it.

#### **6.4. Transparency: Information Request and Complaint Mechanisms Fusion**

COMRURAL’s accountability relationship presented a challenge when analyzing the project’s *Information Request* and *Complaint and Response* mechanisms due to the lack of specific mechanisms for each of these purposes. Consequently, interview and document data usually overlapped between the two accountability dimensions, making it harder to categorize experiences and shortcomings to one specific dimension. These overlapping characteristics became more and more obvious when holding interviews because agents and principals/would-be principals reported using the same mechanism for both purposes.

The overlapping mechanisms are:

1. Same landlines to receive information requests or complaints.
2. Same e-mail addresses to receive information requests or complaints.
3. Same offices/departments to receive information requests or complaints.
4. Same website contact form to receive information requests or complaints.

In all of the aforementioned mechanisms, the same agents are in charge of processing simultaneously all information requests and complaints received.

An analysis of the project’s website, an apparently complaint-specific mechanism previously mentioned in the interviews, also showed the aforementioned overlap. When data collection for this study concluded, the project’s “Buzón de Quejas” (complaints inbox) stated that the mechanism can be used to present an online “complaint or query” (literally, in Spanish: *Queja o consulta*) which would exemplify, once again, an overlap, as the same web form is used for the two purposes without a clear distinction. Furthermore, the webpage fails to mention any mechanism for where to request information. The contact section is presented on the same page as

the complaints inbox. From the description given by the interviewed agents, any information received through this web form, be it an information request or complaint, would be processed by the same agent: the project's webmaster.

**BUZÓN DE QUEJAS**

Asunto

Nombre \*  
   
Nombre Apellidos

Número de Identidad \*

Correo electrónico \*

Teléfono

Queja o consulta \*

Enviar

**Dirección Oficina Central en Tegucigalpa:**

- Col. La Estancia, Ave. Galván, media cuadra arriba de las oficinas de LA MACCIH, Final del Boulevard Morazán, Tegucigalpa, Honduras, C.A.
- Ing. Francisco E. Posas Guevara, Coordinador Nacional
- TelFax.: (+504) 2221-1008 / 2236-8112
- Horario de Atención: 8:00 am a 5:30 pm
- Email: comrural@comrural.hn

• Oficina Regional Santa Rosa de Copán. Colonia Santa Fe, frente a Gasolinera Puma Santa Fe, carretera internacional, Santa Rosa de Copán.

• Ing. Santos Silverio Núñez, Coordinador Regional

• Tel. 2662-6560 / 2662-5280

• Oficina Regional Siguatepeque. Plaza Los Mangos, locales B1 y D1, Barrio El Centro, 3era. Ave., 3era. y 2da. Calle S.E., frente a Cooperativa Taulabé Ltda., Siguatepeque, Comayagua.

• Ing. Mario Torres, Coordinador Regional

Enviar mensaje

Image 5. Snapshot taken on the 2<sup>nd</sup> of June of 2020 from COMRURAL's website which shows the project's "Buzón de Quejas" (Complaints Inbox) form.

This, apparently insignificant overlap characteristic could be the reason for the common **lack of information** among project principals. It was argued by all interviewed RPO members that no complaint mechanism was made clear to them at any stage of the COMRURAL project. Nevertheless, they demonstrated knowledge about the information request mechanisms, which in this case would indicate that they also have knowledge about the complaint mechanisms, although they are not aware of that. The lack of awareness that information mechanisms can also be used as complaint mechanisms indicates that information has been communicated inappropriately or has not been communicated at all. Contrary to the empirical reality, interviewed agents expressed that the complaint mechanisms were known to all principals/would-be principals and easily accessible. This lack of information and the uneven perceptions regarding the clarity of what constitutes a complaint mechanism, creates a considerable accountability gap if principals, unaware of the mechanisms at their disposal, are not able to present a complaint effectively and if agents, in conflating complaints with information requests, are not able to adequately process submissions.

It would be inaccurate to comment regarding the positive or negative effects of having overlapping mechanisms from the sole experience of the agents and principals/would-be principals involved in the COMRURAL project. The factors that made agents merge these mechanisms, the effectiveness of doing so, and the impact this has on principals/would-be principals should be assessed through

a comparative analysis between COMRURAL's experience and one from another project with exclusive mechanisms.

However, it is possible to mention a complaint-specific shortcoming found in COMRURAL's accountability relationship that could be linked to the characteristic of having the same agents in charge of mechanisms which handle two different purposes. This refers to the lack of *systematization of complaints*, which constitutes an essential factor for a project to have preventive actions. By systematizing previous complaints, experiential learning can be enhanced within any given project. It provides agents with means to modify policies or improve implementation routines in order to prevent similar complaints from being repeated in the future. This is something that has not occurred in the COMRURAL project.

Systematization is not as relevant for experiential learning when it comes to information requests, even though it would still be a good practice. Therefore, it could be possible that, if agents are more focused on efficiently handling information requests through a specific mechanism, they will overlook enhancements, such as systematization, because they do not consider them as an essential improvement. In this case, as information requests and complaints are rolled into one, hindering systematization of information requests also hinders systematization of the complaint mechanism – a far more consequential outcome. Agents could therefore hinder enhancements on one of the simultaneous purposes of said mechanism, without them knowing.

## **6.5. Participation: Influence in Decision-Making**

Principals in the COMRURAL project have expressed that there is a need for them to be able to influence decision-making at the project's more general levels, due to the instability of the agro-market. This need becomes even more important as a result of the recent weather-pattern changes the country has experienced due to climate change. As they become more prone to sudden shifts in their production, their ability to influence decision-making needs to increase in order to mitigate the economic losses that they might suffer. USAID's climate risk profile for Honduras corroborates this claim:

Honduras is one of the poorest countries in the Western Hemisphere and is vulnerable to climate change due to its high exposure to climate-related hazards (hurricanes, tropical storms, floods, droughts, landslides) that devastate crops and critical infrastructure...The rural poor overwhelmingly depend on rainfed agriculture as their principal livelihood and are concentrated in the southern and **western regions**, known as the Dry Corridor, where food insecurity has become a recurrent issue. (USAID, 2017, p. 1)

Examples of this need, and the inability of principals to influence decision-making, can be seen in this case study and the experiences of the CAEOL RPO.

CAEOL is an agricultural cooperative which serves as a collection and distribution center for vegetables. They are associated with several smaller producers that deliver their products to CAEOL and, afterwards, this organization is in charge of selling the products on their behalf. To

carry out their collection and distribution business, CAEOL requires a sanitary license in order to operate in compliance to Honduran law.

As a requirement to participate in the sub-project component, COMRURAL's policy papers mention that RPOs must have an environmental license. In contrast with the sanitary license, environmental licenses for the agricultural sector are required, under Honduran law, only for **producers** of agricultural goods; meaning it does not apply for distributors, such as CAEOL, since they have no plantation sites. Because this requirement does not apply to CAEOL, it would be time and resource consuming, as well as useless, for them to try and acquire such license.

CAEOL was already a participating RPO in the first stage of the COMRURAL project when they were informed about this mandatory requirement for the project's second stage. CAEOL's board tried to communicate to COMRURAL's agents that acquiring the license was an unnecessary requirement for their organization, but it was impossible for them to influence a change. This ultimately resulted in CAEOL being left out of the second stage of participation in COMRURAL, under the justification that they did not fulfill the environmental license requirement.

Throughout the previous situation, the members of CAEOL, as principals of COMRURAL, were denied participation in two of the identified participation types for civil society participation in the project; namely, decision-making participation and sub-project participation. Even though they were aware that they had been affected, at the moment of the interviews it was impossible for them to identify any accountable agents for this situation. Similarly, they were unable to pinpoint any specific reasons for why they were unable to participate in, or influence, the decision-making processes of a project in which they were supposedly included. These denials of participation have helped identify an accountability gap in COMRURAL's accountability relationship.

To pinpoint the aforementioned accountability gap, two apparently common situations need to be mentioned. These situations could be considered essential factors in the denied participation outcome suffered by CAEOL:

- 1) Principals, such as CAEOL, have no arena through which to demand a change in requirements whenever they face a situation that affects them. It would seem that their role is limited to strictly fulfilling requirements without being able to give feedback on the feasibility of said requirements.
- 2) Principals lack information concerning which agent to contact to address their issues. Usually, they will contact project technicians, but it is common for these agents to argue that decisions have been made by "superior" agents to them and that they have a limited capacity when it comes to requesting changes in policy documents. Consequently this first contact is often useless.

These two situations can be linked to a single accountability gap which is the **lack of participation civil society has in COMRURAL's decision-making organs**. The Directive Committee serves as the organ through which issues like the one faced by CAEOL could be addressed, however civil society participation in this organ is limited and presents several hurdles that limit effective participation.



The first hurdle for civil society in the Directive Committee is that the number of available representatives allocated to them are small compared to the number of principals involved. The project's policy documents mention twelve value chains for sub-project participation; these value chains are significantly distinct from each other and include things such as livestock, tourism, and specialty coffee, among others. Within each value chain category, the project has different quantities of RPOs participating. It is surprising that, even though RPOs differences are acknowledged by the project, the policy documents state that all of these participating RPOs are supposed to be represented by a single member on the Directive Committee. This issue becomes relevant, not because of the mathematical proportions regarding representativeness or the possible communication hurdles between RPOs that have also been mentioned by the interviewees, but because of the diversity among the categories and the aforementioned unsteadiness of the agro-market which could consequentially affect each category differently.

First, the modicum of power that civil society holds in the project's decision-making organ could, for example, be in the hands of an RPO that is participating in a highly successful value chain. In a hypothetical case in which principals from a different value chain are suffering, the representatives for civil society could lack motivation to pursue changes in matters that do not directly affect them. Secondly, would-be principals, such as indigenous communities, are entirely neglected any participation in the Directive Committee, further limiting civil society's participation in decision-making. Lastly, civil society's representation on the Directive Committee is dependent on the approval of agents of that organ. This filter constitutes a hurdle because there are no written rules specifying the criteria to judge which principals can participate or not. This uncertainty could be a factor that diminishes principals' willingness to seek a spot in the Directive Committee.

Now that the accountability gap regarding participation in decision-making has been discussed, it can be noted that in COMRURAL's accountability relationship it was possible to identify certain principals that had influence over decision-making without accessing the Directive Committee. APROLAC's influence is an outlier situation and is discussed below. Furthermore, before analyzing APROLAC's experience, it is worth noting that the information regarding changes in the project influenced by this actor is based solely on data gathered through interviews. Previous and current policy documents were requested to perform a comparative analysis; however, these documents were not supplied by the agents and principals involved.

In contrast to CAEOL's case, the members from another participating RPO expressed total satisfaction regarding their participation in the sub-project component of COMRURAL and in the decision-making processes; that RPO was APROLAC. APROLAC was the first dairy products company to enter COMRURAL and, with them, the project launched the "Livestock Value Chain". Board members from APROLAC indicated that their suggestions were always taken into consideration and that they had been involved in several decision-making processes.

Since APROLAC was the first dairy-products company in COMRURAL, several of the requirements asked of them were based on experiences from other value chains and therefore, not applicable to their case. This is to some degree similar to CAEOL's case. Along the same lines, the technical assistance they were receiving was not specialized to their business sector at the

beginning. As APROLAC consolidated itself within COMRURAL, it was noticeable that several requirements regarding mandatory licenses were unnecessary, difficult to fulfill, or too expensive. Additionally, due to the nature of their production, APROLAC needed to purchase equipment from Italy, however the existing policies did not take into account the possibility of making purchases abroad. In order to address this issue, APROLAC's board initiated contact with COMRURAL's agents through the regional and national coordinators. As a result, the Environmental Management Plan and the acquisition policies were modified to fit the market reality of the dairy-products business based on APROLAC's experiences. According to interviewed principals, the modifications entailed making requirements more flexible or completely removing some of them. Once these modifications were in place and had been used and tested by APROLAC, they became the standard for future RPOs in the same value chain.

It is worth noting that the interviewed principals expressed that not all of their proposals led to policy modifications. They stated that, due to time constraints, some of their proposals were not taken into consideration during the implementation of COMRURAL. However, they had been notified that their suggestions were going to be included in COMRURAL's second stage set to start in 2020. No documents with explanations or descriptions of APROLAC's suggested changes were found available to the public. When asked about how these changes came to be, interviewees argued that everything was carried out through direct coordination between the project's coordinators and APROLAC's board. These statements further corroborate what had been previously described regarding APROLAC's access to officials from the WB and the implementing agency.

This study's data suggests that, as a general rule in the COMRURAL project, a principal's decision-making capacity is limited to business decisions in their own organization. This refers to on-the-field issues such as deciding which production branches receive investment priority at a determined time. However, the ability to take such decisions began only after agents acknowledged that it was easier to achieve profit if the principals on the field decided where and how to invest funds in order to mitigate the fluctuations commonly found in agro-businesses.

CAEOL's case demonstrates the negative effects that an accountability gap can generate. APROLAC's case shines light on the possibility of influencing decision-making in a project without using any formal organs defined for that purpose. The specific causes that lead to each of their outcomes demand a deeper analysis than the one that has been done for this study.

## **6.6. Participation: Who is Accountable for Indigenous Participation?**

According to the World Bank's Implementation Completion and Results Report, indigenous participation in the COMRURAL project surpassed the set goals. This is found in the document's "Indicator 10" which measures whether or not "At least 70% of business plans in the Project successfully implemented measures that target the youth and indigenous communities, when applicable, as identified in the business plan." (World Bank, 2017). According to this indicator, the goal was exceeded by 114%, the project ensured consultation and participation of indigenous

producers in business plan development and implementation, and almost 50% of RPO members were indigenous.

Nevertheless, all of the indigenous representatives interviewed for this study expressed that they did not feel that COMRURAL's evaluations and statistics accurately depicted the reality regarding indigenous participation in the project. The main reason for their disagreement related to the existence of conflicting criteria between what agents use and what principals/would-be principals would like them to use to filter participants and categorize them as indigenous participants. This has resulted in confusion and complaints regarding the participation of indigenous individuals in the project.

This issue had been previously described in the "Policy Content" section of the participation dimension and is detailed here. According to the project's written policies regarding indigenous participation, it is stated that in order to be considered a member of an indigenous community, individuals are only required to determine themselves as such; meaning, as long as an individual considers himself as someone of indigenous or tribal descent, he should be considered indigenous (World Bank, 2009). In contrast to this position, interviewed indigenous representatives argued that having a single requirement is not effective for filtering indigenous participants because it opens a window for individuals to pose as indigenous members when they are not. In Honduras, several indigenous organizations are officially recognized by the state and, according to indigenous interviewees, it would be better if membership in one of these indigenous organizations was established as the requirement to consider someone as an individual with indigenous or tribal ascendance.

In COMRURAL's Social Participation Plan, all indigenous organizations existing in the project's impact region were mapped and consist of the following: Organización Nacional Indígena Lenca de Honduras (ONILH); Federación Hondureña Indígena Lenca (FHONDIL); Movimiento Indígena Lenca de Honduras (MILH); Consejo de Gobierno Lenca (CGL); Consejo Nacional Indígena Maya Chorti (CONIMCH); and Coordinadora Nacional de Indígena Maya Chorti (CONADIMCH). Representatives from three out of these six organizations participated in this study's interviews. They all expressed a view that membership in their organizations should be a requirement to be considered as an indigenous participant in COMRURAL.

Their position regarding which criteria should be used to filter indigenous participation is substantiated in previous experiences they have had when engaging with other international organizations, and also in line with their experiences in the initial stages of the COMRURAL project. When the initial consultations to approve the project were carried out by the World Bank and officials from Honduras' government, representatives from the previously mentioned organizations were contacted directly and their approval and support was sought in order to fulfill the safeguards laid out in the WB's Operational Manual "OP 4.10" which regulates the responsibilities that WB staff has when engaging in projects that involve indigenous populations. Their approvals were all sought as organization-backed approvals from state-recognized indigenous organizations, and not as individuals identifying themselves as indigenous members.

They claim that it is contradictory that, once project implementation started, the criteria changed from being based on membership/organization to individual self-determination. In the project's results frame, several indicators for indigenous participation were set and, according to interviewed indigenous representatives, this is the reason for the change of requirements.

If agents have no incentives to facilitate indigenous participation and are, at the same time required to fulfill the project's results frame, it would seem logical to argue that by having self-determination as the only requirement it becomes easier for agents to successfully fulfill evaluation goals. However, this would come at the expense of not having verifiable indigenous participation. Even though on paper it would seem satisfactory, deeper analysis could unveil irregularities like those mentioned by the interviewees.

When asked about a possible change in requirements, both COMRURAL's Social Specialist and the Regional Coordinator for Copán immediately expressed their concerns regarding a possible decrease in the achievement of participation goals and did not comment on the positive impacts this could have regarding a more verifiable indigenous participation. This attitude could be seen by some as a confirmation of the aforementioned reasoning apparently used by agents: they are mostly concerned in fulfilling, on paper, the indicators established in the results frame.

Furthermore, MILH's Indigenous Representative, IR-2, expressed that his main concern is that financing that could improve indigenous communities' lives is going somewhere else. He added that in other projects, there have been situations in which people emerge as indigenous members whenever international organizations start implementing a project in Honduras but once the project financing ends, these individuals are never seen again. Consequently, because they never maintained membership in any indigenous organization, the communities never receive any benefit from their participation in the project.

The shifts in the criteria for selecting certain individuals over others, represent an accountability gap by themselves because no written specification for such shifts has been found and involved principals were not part of the decision-making process. Additionally, the differences that emerged between officials and indigenous representatives, due to the shift in criteria, shed light on another accountability gap: the inability of indigenous representatives to pursue a change in policy documents that directly affect them because they have no participation or influence in any decision-making organ.

Indigenous organizations are a peculiar case in COMRURAL's accountability relationship because agents have considered them principals at certain points in time and would-be principals at others. In the early stages of the project, agents acknowledged that the project's impact region was inhabited by several indigenous groups and therefore made themselves accountable to them before project approval through consultation mechanisms. Nevertheless, once project implementation started, agents argued that indigenous organizations fell outside of the project's objectives since they are mainly subsistence farmers. Hence, during project implementation, indigenous organizations continued to demand accountability from COMRURAL's agents, but

due to the agents' explicit denial of this relationship, they have been relegated to a would-be principal status.

Issues concerning principal's influence in decision-making organs have already been discussed. This discussion holds up for would-be principals such as indigenous organizations as well. Regarding this topic, MILH's Indigenous Representative, IR-2, argued that a solution would be for legally recognized indigenous organization, like MILH, to be included as members of COMRURAL's decision-making organs directly. Something like this has never occurred, according to policy documents, and when asked about it, interviewed agents at COMRURAL's regional office stated that they had no knowledge regarding whether or not indigenous representatives had access to the project's Directive Committee. It seems contradictory that a project that directly identified the existence of indigenous individuals and their formally recognized organizations in their impact zone at the earliest stages of project development, has never included any of these organizations in their decision-making organs.

CONADIMCH's Indigenous Representative, IR-1, also expressed his concerns regarding the accessibility indigenous communities have to the COMRURAL project. He pointed towards a problem of unequal access to the COMRURAL project for indigenous populations. IR-2's input regarding the historical conditions of indigenous populations shine light on this claim.

First, it is acknowledged by both the indigenous representatives and the WB's reports that the impact zone of the COMRURAL project is a region with several indigenous communities. In the past, these communities have been isolated from agricultural development in the country and have therefore been historically poor. Nevertheless, since their early existence, these communities have maintained small agro-businesses of their own which are typically used for subsistence farming. Secondly, the COMRURAL project objectives are based on a profit-driven logic which seeks to generate competitive value chains in Honduras' market. Under this logic, stronger businesses are better positioned to contribute towards reaching the results found in the WB's results frame. Nevertheless, because of the social demography of the impact zone agents of the COMRURAL project included within the results frame an indigenous participation item.

This has resulted in a contradiction between the agents' goals of fulfilling the project's results frame, the project's business-driven objectives, and the expectations of indigenous communities and organizations of being a part of the project. This contradiction is enhanced by the fact that indigenous communities were invited to participate in the consultation processes without being informed of their condition within the project and the accessibility constraints that they would encounter in later stages of COMRURAL. According to IR-1, these situations position indigenous organizations disadvantageously and with lower levels of access than other bigger agro-businesses in the region.

The accountability dimensions and their corresponding elements, as presented in this study, enable the possibility of implementing mitigation measures that take into consideration the unequal characteristics of an historically excluded group vis-à-vis stronger business sectors. It is now clear that COMRURAL's goals, the agents' duties, and the financial constraints suffered by the

indigenous populations in the region, have generated contradictions that can hardly be communicated, or solved, if there are no appropriate accountability mechanisms in place.

It must be noted that, even though indigenous communities from both the Lenca and Chortí populations have actively sought participation in COMRURAL, all of the interviewed indigenous representatives expressed a viewpoint that the project has not directly impacted or benefited their communities in any way.

Accountability mechanisms become relevant for indigenous communities because several indirect consequences can emerge throughout the implementation of projects such as COMRURAL. Due to the market-driven logic behind the project and its co-financing nature, private property and market competition seem like something that should be inherent in participants' actions. That would not be the case for several indigenous communities in Honduras. This can be exemplified through MILH's Indigenous Representative words. IR-2, explained certain characteristics that make up the social tissue of indigenous groups, such as (I) the existence of community-owned lands which cannot be used as collateral private properties for co-investments, and (II) the predominance of unskilled labor which is often not considered as an investment asset. Implementing projects such as COMRURAL in regions where indigenous communities with these characteristics are settled, presents a risk of rupturing the social tissue in the community and can generate unwanted social pressure on their members. Consequently, accountability mechanisms, even in those cases where indigenous communities are not participating directly in the project, can be seen as relevant in such contexts. Understanding and being aware of the aforementioned characteristics makes it possible to grasp the would-be principal role of indigenous organizations and why they claim that they have the right to hold international organizations, such as the WB, accountable.

## **6.7. Evaluation: The Evaluation Contradiction**

Regarding the Evaluation dimension of accountability, it can be argued that, in COMRURAL's accountability relationship, civil society faces a single but significant accountability gap.

The accountability gap affecting the evaluation dimension has an impact on all principals and would-be principals across the project in the same way. Namely, the accountability gap in the evaluation dimension refers to the restricted role civil society has in evaluations carried out in the COMRURAL project. Such a restricted role directly links to civil society's inability to have proactive participation within evaluations and consequently eliminates any possibility for civil society to further shape the project through their feedback. Based on this study's data collection, it is possible to conclude that, since the project's beginning, civil society has never had the ability to shape evaluation criteria in a significant way. They have also been neglected from the opportunity to evaluate the performance of the agents with whom they interact.

Throughout the data collection of this study, it has been a constant for interviewed agents to refer to members of civil society exclusively as the **subjects of evaluation**. It is this restricted participation which enables an accountability gap according to this study's theoretical framework. It can also be stated that according to the data collected throughout the interviews, and judging

from the project's earliest documents, it is safe to argue that members from civil society have never been considered by agents as potential partners for a more active role within evaluations.

Having evaluation policies which enforce such restrictive characteristics, regarding the participation of members of civil society, come across as contradictory when compared with the statements made by project agents during interviews. Interviewed agents constantly mentioned that civil society's feedback is considered highly valuable to them and essential in all processes that seek to make improvements in the project. However, if civil society has no procedures or opportunities to evaluate the project's implementation actions, policies, or administrative procedures, it becomes more difficult for agents to have access to their feedback.

In the previous paragraphs, it has been explained how this accountability gap negatively impacts the project by limiting the capacity of principals/would-be principals in giving feedback to further shape the project. Furthermore, another negative impact is that the power relationship between agents and principals/would-be principals becomes imbalanced by the fact that agents are always in a position of evaluating principals at all stages of the project, without any possibility for reciprocal evaluation.

This study's data also described a positive situation in which principals had an active role in evaluating the project. This situation can shed light on the positive effects of that experience within the project's accountability relationship. Throughout this study's data collection, one occasion in which civil society was invited to take an active role in evaluation has been found. This occasion refers to an evaluation workshop which, according to the interviewees, enabled principals to take on the evaluator role and resulted in their feedback directly impacting the project's future. The WB's Rural Development Specialist mentioned a feedback workshop organized for civil society in the mid-term evaluation of the COMRURAL project. This is the only occasion in which civil society has had the opportunity to evaluate anything from the COMRURAL project. All the interviewees, both agents and principals, that made reference to this workshop labeled it as something useful for them. All participants had a shared perception that through their participation in the workshop, the project underwent changes which represented the feedback provided there.

An example of the positive impacts of an accountability relationship in which civil society has an active role during evaluation can be found in this workshop. At the workshop, civil society evaluated the role of involved agents and directly addressed their lack of involvement in certain areas that were considered important. More specifically, they expressed the need for agents to intervene in the relationship between RPOs and private banks. They made that request because co-financing credits were not being given out to many of the participating RPOs, as banks were unsure about their capacity to make payments. As a result of this assessment made by civil society over the agent's role, two solutions were proposed and implemented. (I) COMRURAL's agents started to hold meetings with private bank officials and, (II) COMRURAL's agents redacted a memorandum which asked private banks to facilitate credit requests from RPOs that were participating in the COMRURAL project. This request was made based on the fact that RPOs had already received the WB's approval regarding financial capacities. Both of these actions resulted in faster co-financing approvals from the banks and strengthened COMRURAL's name in Honduran markets. Additionally, while implementing the aforementioned actions, agents also

discovered that there was a need for implementing workshops at COMRURAL's regional offices with bank agents in order to inform them of the COMRURAL project.

While discussing their experience in this workshop, CAEOL's president, PP-3, argued that, for his organization, the workshops were a positive experience which allowed them to finally have a role as evaluators of the project instead of being the subjects of evaluation, as was usually the case. This demonstrates that the aforementioned principal is aware of his organization's limitations in the evaluation processes while at the same time is able to identify the positive aspects that would emerge, were they allowed to adjust that situation.

Unfortunately, even though this workshop is mentioned in several documents and has been commented on by several interviewees, no documentation has been archived by COMRURAL or the WB. This fact could be interpreted by some participants of the COMRURAL project as evidence of the underlying lack of will to include civil society in evaluations. A consequence of not having memoirs from the workshop, according to some principals, is that, even though the feedback given by participating principals was not limited to the bank-producer relationship, it is impossible to track other suggestions and verify whether or not they received any kind of follow up.

Lastly, when asked about the restrictions on civil society's role in the evaluation process, COMRURAL's agents stated that the reason for civil society not having more active participation is because the tasks around this activity are highly technical. This might seem true at first, but it becomes hard to argue that it is impossible for civil society members to understand the evaluation details if proper training is given as an integral part of the project's policies.

## **Chapter 7. Conclusion**

Through this study it has been possible to take a deeper look into the characteristics, benefits, and shortcomings of an accountability relationship between members of civil society and an international organization, as well as provide empirical examples of their importance. The intrinsic nature of accountability as an essentially contested concept was identified early in this research's design as the most significant challenge to the study's replicability and/or relevance in the academic field. Such intrinsic nature must always be kept in mind by readers when assessing this study's data collection procedures, findings, and discussions.

In an attempt to overcome the challenges posed by working with an essentially contested concept, this study lays down its essential groundwork in the operationalization of the accountability concept. By relying on previous literature and their theoretical findings, it has been possible to dissect the dimensions of an accountability relationship in a clear-cut manner which reduces the ambiguity regarding what elements are relevant when looking into the accountability relationship of a specific project. This also allows for precise pinpointing of areas in which accountability is



lacking while using theoretical concepts already recognized in academia. Additionally, even though this operationalization may be theoretically cumbersome, it can be considered practical as it enables researchers and readers to easily recognize the elements of an accountability relationship in their empirical reality when analyzing project documents or listening to actors' experiences.

This study has provided a detailed and descriptive analysis into how the accountability dimensions of "*Transparency, Participation, Evaluation, and Complaint and Response Mechanisms*" have developed within the accountability relationship in the COMRURAL project in Honduras. It must be clarified that the present study does not seek to be a criticism of the COMRURAL project, but rather illuminate possible directions for future research in the accountability field. Accountability is already perceived as something positive and desired by international organizations such as the WB. Therefore, this study compares to what degree the desired standards of accountability found in academic works and in international organizations' policy documents, are met in the empirical reality of the COMRURAL project. Consequently, this study can also function as a tool for more practical situations, such as the improvement of accountability mechanisms used by international organizations when engaging with civil society.

With this clarification laid out, and before addressing the conclusions of the research questions, two remarks can be made regarding the COMRURAL project's accountability relationship at its most general level.

First, participation in the COMRURAL project is highly market-driven and therefore, it would seem common that all agents and principals/would-be principals have a **preconceived notion that participation is limited to receiving money** via co-financing, increasing production, and making profit. This mentality could be one of the main factors explaining why there is almost no participation from civil society in decision-making and why most agents and RPOs seem to be mostly interested in achieving the financial goals presented to them. Unwritten, but intrinsic, notions (E.g. a market-driven, profit-generating vision) that guide and define projects, from their most early stages, should be an object of further analysis for academics. This is because it would seem that the accountability relationship of a given project, and consequently the mechanisms defined for it, develops in a pre-constrained manner within the boundaries laid out by the aforementioned unwritten notions. Therefore, what might seem to be "highly accountable" mechanisms for a project, could instead be considered underwhelming when compared to another project which has being developed under more democratic and participative notions.

Secondly, regarding the spectrum of civil society for these types of studies, it is important to point out to the fact that, in their social evaluation, the WB discovered that COMRURAL's impact area was characterized as having a broad range of civil society members, arranged through different organizational forms. This was a defining element when bounding this study's civil society spectrum. What this means, in an empirical sense, is that the project recognizes a wide range of organizational forms which fall outside of the NGO-restricted arena. Hence, indigenous organizations, financial cooperatives, agricultural cooperatives, local communities, and more, are all recognized as organizations that make up the civil society spectrum and, even though the project has failed to successfully introduce them into decision-making organs, they are still relevant for understanding its accountability relationship. It can be argued that studies like the one at hand can

greatly benefit from using this less restrictive notion of what constitutes civil society. By doing so it is possible to gain deeper insight and more accurately understand situations that are relevant for an accountability relationship but fall under categories such as “would-be principals”.

Lastly, the following sub-sections present the main conclusions concerning the research questions defined for this study. The first two questions are covered in the first sub-section since they touch upon the more general and descriptive elements of the COMRURAL project. The last two questions are merged in the second sub-section as they both relate to accountability gaps. A final sub-section analyzes possible theoretical explanations, useful for future research, for some of the organizational attitudes identified in COMRURAL’s accountability relationship.

## **Research Questions 1 and 2**

Research question 1 asked, *“How did the accountability relationship between civil society in Honduras and the World Bank’s COMRURAL project officials occur?”*. This research question entails the core of this study and is answered in detail throughout the **Analysis** chapter of this paper. Nevertheless, it can be said, as a concluding remark, that the accountability relationship between Civil Society in Honduras and the World Bank’s COMRURAL project officials, is a relationship which began in the project’s early consultation stages, before project implementation started in 2010. The relationship is characterized by having many “unwritten rules.” These include what agents often referred to as “common work duties,” confidentiality policies, or the pre-conceived notions that agents and principals/would-be principals have regarding the project’s market-driven goals. It can be argued that the accountability relationship is constrained by these “unwritten rules”.

The range of civil society engagement between principals/would-be principals and agents is uneven throughout the project. It has been discovered that principals have different degrees of engagement and influence within the project. The factors that underly such differences are unclear and raise more research questions which fall outside of the scope of this study. Adding to this, civil society engagement has also been affected by the fact that, throughout the years, the project’s accountability relationship has experienced changes regarding who is considered to be a principal. An example of this includes indigenous communities that were considered to be principals for the consultation stage but were not considered principals following the shift into the implementation stage.

When assessing the accountability relationship as a tool to ensure the project’s objectives or the fulfillment of its activities, it is hard to pinpoint a situation in which having a faulty accountability relationship posed a risk to fulfilling any of these. The lack of risk to the project’s objectives, could be one of the reasons explaining why the COMRURAL project has never had any evaluation of its accountability mechanisms. Additionally, it must be noted that agents have no incentive to seek an improvement in accountability within the COMRURAL project.

Research question 2 asked *“What elements, from a theoretical accountability relationship, are missing in the accountability relationship between civil society in Honduras and the World Bank’s COMRURAL project officials?”*. This second question is thoroughly explained throughout both

the **Analysis** and **Discussion** chapters of this study. This second question is considered a cornerstone for this study's findings since it directly connects to research questions three and four. In order to identify the characteristics and impacts of an accountability gap (the topics of research questions three and four), the first step is to identify the missing accountability elements the project has in comparison to a theoretically perfect accountability relationship. These lacking elements can be considered the project's accountability gaps.

The main lacking elements in COMRURAL's accountability relationship are:

- The common practice of having unwritten policies which serve to generate confusion among principals/would-be principals. This can be seen in the lack of written confidentiality policies or the unwritten criteria for selecting which members from participating RPOs have representation in the Directive Committee.
- The lack of systematization or written memoirs of processes, such as the consultation workshops, in which civil society has participated. This hinders accountability because it is impossible for principals to follow-up on their input and have some type of influence over the project's decision makers.
- The lack of a specific mechanism to deal with complaints. The project conflates complaint and information request mechanisms, potentially limiting civil society from pursuing redress if they are unaware that complaint mechanisms are found within information requests mechanisms.
- The lack of appeal processes is a constant throughout the project's activities. This limits civil society's range of action, as they are unable to request a reassessment of those situations in which they feel they have been impacted.
- The limited participation from principals in the project's decision-making organs, such as the Directive Committee, and the absolute nonexistence of participation mechanisms for would-be principals such as indigenous communities.
- The limited role of civil society in evaluation activities. This limited role could heavily impact the project's improvement if only agents' points of view are taken into consideration and no other actors are supplying feedback regarding their roles or the project's activities.

### **Research Questions 3 and 4**

Research questions number 3 and 4 refer specifically to the accountability gaps that were expected to be found in the COMRURAL project. Even though these questions might come across as "cause and effect" inquiries, the goal of this study is not to confirm causal effects. Instead, by detailing the empirical reality of COMRURAL's accountability relationship, these two research questions seek to pinpoint apparent situations, factors, and consequences that can be found in the project's accountability relationship and that could be the subject of further empirical testing and comparison across different projects implemented by international organizations. Through comparative studies it could be possible to establish whether or not their apparent effects are a

constant across accountability relationships, if they are exceptions, or if they are not related in any way.

Research question number 3 asked “*If accountability gaps are found; what factors or situations originated them?*”. Behind the accountability gaps mentioned in research question number 2, three common factors seem to be present in all of them. These factors affect the project across all of its dimensions and would seem to be originating situations which consequentially yield accountability gaps. One of them is related to the Honduran context and relates to how principals and agents are used to carry out their interactions, which is through a *vertical culture*; the other two relate to the normative aspects of the project which are easily modified and could result in quick changes for improving the accountability relationship. These are the *project’s objective* and the *lack of formal incentives*.

This study’s interviewees expressed, on several occasions, that it is common in Honduras to execute projects through vertical mechanisms in which principals/would-be principals are not consulted and have little impact on the project’s decision-making organs. This vertical culture could be perceived as one of the factors resulting in the exclusion of principals/would-be principals from several organs in their policy papers. Important activities such as evaluations, or important organs such as the directive committee, are to a great extent limited to agent participation as it is perceived that agents are the only ones with the technical knowledge needed to participate in them. Several, if not all, of the accountability gaps identified through this study were mentioned by principals/would-be principals. In very few cases, however, had they communicated their suggestions to the involved agents. This lack of feedback, which is a constant in all of the identified gaps, is found in the project because of the verticality of several processes that do not allow for principals/would-be principals to communicate their needs. The verticality of those processes is also a barrier which causes principals/would-be principals to restrain themselves from seeking more engagement in shaping the project due to an expectation of not being heard and expending resources on something deemed fruitless.

Secondly, another *factor or situation* originating accountability gaps relates to the *project’s objectives*. As expressed before, the COMRURAL project is highly market driven. This limits the reach for accountability improvements because some elements from the aforementioned, theoretically perfect accountability relationship fall outside of the contextual factors that could affect the market objectives defined for the project. If this were to be addressed, actions would be required to balance the project’s market objectives with the improvement of existing accountability mechanisms. However, this is not occurring in the COMRURAL project. This directly points to another underlying issue - the *lack of formal incentives*. Actions, such as balancing the project’s objectives or promoting actions which strengthen the accountability mechanisms, are rare in the project because agents receive no benefits or rewards if they do so. In none of the accountability dimensions is there any type of incentive for agents to strengthen or improve them. This was verified through the interviews, in which agents stated that no incentive was given to officials involved in the project’s accountability dimensions because they were all considered to be “work duties.” Nevertheless, it is now clear that, even though they are considered work duties, several improvements can be made in the project’s accountability relationship. Not only is there potential

for improvement, but also, good accountability relationships, like the one described by indigenous organizations during the consultation stage, have deteriorated over time. Such deterioration and the denial to invest resources into improving the project's accountability relationship can both be linked to the fact that agents have no incentives to do so. Establishing formal incentives laid out in the project's policy documents could aid in overcoming the aforementioned issues.

Lastly, research question four asked *"If accountability gaps are found; how did they affect, or not, the members of civil society in Honduras?"*. This question has been thoroughly addressed through the case experiences analyzed in the **Discussion** chapter which provide great detail into how different type of accountability gaps affected different members of civil society. Nevertheless, as a conclusion, two things must be noted:

First, as expressed in this study's expectations, it has been confirmed that *"the impacts of accountability gaps will not affect members of civil society in the same way"* and it is therefore possible to state that **accountability gaps affect civil society members in varying degrees and manners**. This is easily noticeable when looking at the different experiences that occurred within the COMRURAL project. An excellent example relates to the limited participation principals/would-be principals have in decision-making organs. For the APROLAC RPO, the project's limited participation did not represent a major hurdle, and they achieved changes in policy documents through other means which resulted in their organization's consolidation in the dairy-product market. Contrary to APROLAC's case, the CAEOL RPO was not able to influence a change in the project's policy papers and, even though they had what would seem to be a reasonable request regarding their environmental licenses, they were left out of the project's second stage as a consequence of not being able to influence that change. Lastly, indigenous organizations such as MILH have wanted, for a long time, to influence a change in policy documents regarding the requisites to be considered an indigenous participant. They have not been able to initiate a contact with the agents from the COMRURAL project. These three varied experiences help to demonstrate how a single accountability gap, in this case the limited participation in decision-making organs, can bring about highly different impacts for members of civil society.

The reasoning behind its impacts on different members can be linked to elements including an actor's economic power, their distance from the agents, their historical involvement in the project, and many others. Such inquiries fall outside of the scope of this study, however this paper delivers a solid initial description, useful for enabling future researchers to address more specific causal factors within an accountability relationship that might explain why accountability gaps affect civil society members to varying degrees.

Lastly, to answer the *"...how did they affect..."* question, it is clear that, even though accountability gaps affect members of civil society in different ways, their greatest impact on civil society is concerned with their role in **participation**.

The accountability gaps identified in the COMRURAL project led to situations in which members from civil society could not effectively participate in activities within the project. For example, (I) having unwritten policies on topics such as confidentiality or participation in the Directive

Committee limits the participation of members from civil society because they do not have the required knowledge to do so; (II) the lack of appeal processes negates the participation of members from civil society in them due to their inexistence; (III) the limitations in evaluation procedures which neglects the participation of members from civil society as evaluators; or (IV) the limitations found in the composition of decision-making organs which leave out of their spectrum several members of civil society which are impacted by the project, but fall under the would-be principals category, such as the indigenous organizations.

Consequently, even though all of the aforementioned gaps also affect members of civil society in other ways (e.g. economically, if they are left out of the project such as the CAEOL RPO), the most significant area being affected by these gaps is always **participation**. For this concluding remark, participation must be understood not only as an accountability dimension, but as the action of being involved in different activities and also the degree of involvement an individual has in all of the accountability dimensions.

As stated before, the dimensions found in an accountability relationship are mutually reinforcing. It is therefore possible to understand why accountability gaps such as the ones identified in the participation dimension seem to also affect the other dimensions that possess stronger qualities. In a similar fashion, it can be inferred that if actions are taken to address the accountability gaps regarding participation, a cascade of improvement in other dimensions is possible as a result of the mutual reinforcing nature of these dimensions.

The benefits of addressing the existing accountability gaps would need to be assessed empirically, but, based on the theoretical propositions of a perfect accountability relationship, it can be argued that, if accountability gaps are fixed, the needs of members of civil society impacted by the project will be better communicated and taken into consideration because they will be able to participate whenever decisions are made regarding the future of the project.

## **Trained Incapacity and Learned Helplessness**

After having provided a clearer image of the empirical reality of the accountability relationship found in the COMRURAL project in Honduras and a detailed description of the roles and characteristics of the principals/would-be principals and agents that shape it, this final section shines light on two theories that could be used to explain some of the findings presented in this research. The theories presented in this section are useful to explain why the accountability gaps described in this study would seem to be a known issue to the interviewees, but at the same time neither party has tried to take significant actions to address them. A different theory is presented for agents and principals/would-be principals, respectively.

Regarding agents, this study has found that, even though some accountability gaps are acknowledged, processes to improve the accountability in the project are not prioritized or are completely ignored. This attitude could be explained through Burke (1984) concept of **trained incapacity**, which was originally coined by Thorstein Veblen in his 1914 book “The Instinct of Workmanship and the Industrial Arts”.

In Veblen's original work, trained incapacity is a term used to describe business schools' students who, due to the focus of their studies, suffered from a "righteous disregard of other than pecuniary considerations". Veblen argues that human beings seek "in every act the accomplishment of some concrete, objective, impersonal end" (Veblen, 1994, p. 8), and this need for achieving a concrete goal, is the underlying cause that generates trained incapacity. This occurs because focusing on a specific goal will lead human beings to give attention only to those factors that directly affect that specific goal. The voluntary disregard of everything else that is happening outside of the context that affects a specific goal becomes an incapacitation (Wais, 2005).

According to Veblen (1914) human nature has a natural tendency towards goal-seeking behavior and "training experiences" such as formal education, participating in an organization, work experience, or professional training, will build upon that natural tendency and make certain goals seem more valuable while, at the same time, guiding future human action. Such training, the enhancement of goal-seeking behavior, and the consequential inability to identify and comprehend other issues that lay outside the scope of the training, are the constituting elements of trained incapacity.

These characteristics that lead to trained incapacity can be linked to the attitudes that have been previously described in COMRURAL's agents. Namely, that they have a market-driven focus and lack incentives to improve areas in the project that do not directly improve the economic output of the RPOs participating in the project. Concurrently, this focus is something that can be directly linked to the project's objectives and, it could be inferred that, as part of the recruiting processes for these agents, their capacity to focus on and fulfill such goals was something taken into consideration. Thus, due to trained incapacity, as humans and human organizations improve their efficiency in a specific goal, such as achieving pre-defined sales objectives in COMRURAL, they will also suffer from the risk of becoming less aware of, or ignoring, the possible unintended consequences of their actions, such as flawed accountability mechanisms, if these do not affect their success at achieving efficiency in such a goal.

In a similar manner to the agents, the principals/would-be principals in the COMRURAL project also acknowledged some accountability gaps and were able to pin-point specific situations which have resulted in their not being able to hold agents accountable, having limited participation, or being excluded from the project. As described earlier, the impacts these gaps had varied in degrees and manners, from case to case. Nevertheless, there was a common attitude among principals/would-be principals, particularly in the indigenous participants, of not seeking changes in the project's accountability mechanisms due to the historical experience of how international organizations have carried out projects in the country. They often expressed that they felt they had no possibility of influencing decision makers and that taking action towards change could cause them more harm, such as being excluded from the project, than good.

Such sentiment could be a product of **learned helplessness**. Martinko and Gardner (1982) explain in their work that learned helplessness emerges as a result of repeated punishment or failure, and makes persons "become passive and remain so, even after environmental changes that make success possible" (Martinko & Gardner, 1982, p. 196).

Martinko and Gardner (1982) mention how learned helplessness has been used to explain the behavior of clinically depressed mental patients, staff burnout in social service agencies, and motivational deficits in classrooms; but in addition to these examples, they develop through their study, a model to account for organizational induced helplessness. This type of learned helplessness can be induced by organizational culture, causing individuals to expect future failures for certain actions because they have been unsuccessful in the past within the organization. It would seem that these statements are also relevant and could be expanded from the “organizational” boundaries to the context of an accountability relationship such as the one in the COMRURAL project.

When principals/would-be principals were asked about the reasons for their restraint from seeking changes, they argued that they believed their actions would not cause any effect because international organizations and government agencies in Honduras always used vertical processes to execute their projects. Nevertheless, the World Bank, throughout its history, has brought forward changes to strengthen its accountability mechanisms, especially after being in the spotlight for accountability shortcomings. In addition, agents in the COMRURAL project expressed a willingness to listen and collaborate with principals/would-be principals if they reached out to them. However, agents indicated that such a thing rarely happened. The fact that principals/would-be principals avoid seeking changes due to expectations based on previous failures could be considered an organizational induced helplessness in the development aid sector in Honduras. Due to changing policies in the World Bank, principals/would-be principals in Honduras could be ignoring the fact that they are perceived as more powerful actors than previous actors who failed in their attempts to influence development projects in the country. This failure to exercise their new power is described by Kankus and Cavalier (1995) as a “characteristic of individuals in organizations that exhibit organizationally induced helplessness” (Kankus & Cavalier, 1995, p. 2).

Organizationally induced helplessness has the potential to hinder accountability relationships since it is up to the individuals to demand, and act for, changes that could improve accountability mechanisms. If principals/would-be principals take part in flawed accountability mechanisms, while knowing that they could be better but without proposing changes, they might be more prone to consolidate their feelings of failure. This could generate a self-perpetuating cycle in which failure is occurring due to no changes being proposed, and changes are not occurring because failure is expected.

The theories and claims presented in this final section drift from the present study’s theoretical framework and descriptive nature. They seek to serve as a final remark, and a spearhead for future research which could further inquire into **the effects of organizational phenomena, such as trained incapacity and learned helplessness, on accountability relationships.**



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## Annex

### Annex #1 Interview Guide

<b>INTERVIEW GUIDE</b>	
Interviews will be held in in person, in Spanish, at a physical location established to the convenience of the interviewee.	
Preliminary information: 1) Thank the interviewee for his willingness to participate in this study. 2) Introduce myself and my academic background. 2) Explain practical info such as the interviewees right, data collection policies, consent form and ask for his approval. 3) Explain the reasons for selecting him as an interviewee. 4) Give a brief overview about the study. 5) Explain the study objectives, questions, and hypotheses. 6) Ask if there are any doubts?	
Introduction: First, I would like to ask you about how all the policy documents were created in the COMRURAL project.	
	Accountability Dimension
Element to be Assessed	Transparency, Participation, Evaluation, and Complaint and Response Mechanisms
Policy Development	<ul style="list-style-type: none"> <li>• Which actors participated in COMRURAL's policy development?</li> <li>• Did COMRURAL's officials make an effort to develop their policy and project documents through consultations with relevant principals and would-be principals?</li> <li>• Did principals/would-be principals feedback shaped the final outcome of policy documents?</li> </ul>
Now, I would like to ask you information concerning the Transparency dimension in COMRURAL.	
	Accountability Dimension
Element to be Assessed	Transparency
Policy Content	<ul style="list-style-type: none"> <li>• Does the COMRURAL have rules related to access to information?</li> <li>• Is there a clear statement regarding which information is regarded as confidential, and why it is considered as such?</li> <li>• Does COMRURAL have a clear description of the information disclosure process? This includes: How to make an information request, timeframes, details of how the response will be made, and costs of obtaining the information.</li> </ul>

Implementation	<ul style="list-style-type: none"> <li>• Is there an official responsible of supervising the implementation of the transparency policy at all levels of COMRURAL?</li> <li>• Is there a system of incentives and sanctions for employees to ensure compliance with the policy on transparency?</li> <li>• Is there an appeal process for those situations in which principals/would-be principals feel they have wrongly been denied access to information?</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>• Is information about COMRURAL’s transparency policy, project details, and the process for filing an information request easily available to principals/would-be principals in appropriate form and through appropriate media?</li> <li>• Is the process for filing an information request easily understandable by principals/would-be principals?</li> <li>• Are principals/would-be principals prevented from accessing information due to financial or technical constraints?</li> </ul>
<p>Now, I would like to ask you information concerning the Participation dimension in COMRURAL.</p>	
<p><b>Accountability Dimension</b></p>	
Element to be Assessed	Participation
Policy Content	<ul style="list-style-type: none"> <li>• Does COMRURAL have rules related to principals/would-be principals engagement and their role in participatory processes of decision-making?</li> <li>• Does COMRURAL stipulate how will the outcomes of participatory processes with principals/would-be principals affect decisions and translate into practice?</li> <li>• Are principals/would-be principals able to initiate engagement with the COMRURAL officials?</li> <li>• Does COMRURAL stipulate how to decide which principals/would-be principals groups are involved in the decision-making process? The reasons for selecting certain groups over others? And how are the representatives of such groups selected?</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• Is there an official responsible of supervising the implementation of the participation policy at all levels of the COMRURAL?</li> <li>• Is there a system of incentives and sanctions for employees to ensure compliance with the participation policy?</li> <li>• Is there an appeal process for those situations in which principals/would-be principals feel they have wrongly been denied participation?</li> </ul>

Accessibility	<ul style="list-style-type: none"> <li>• Is information about COMRURAL's participatory mechanism easily available to principals/would-be principals in appropriate form and through appropriate media?</li> <li>• Does participation take place prior, during, and after the decision-making process?</li> <li>• Are principals/would-be principals prevented from engaging in participatory processes due to technical or financial constraints?</li> </ul>
<p>Now, I would like to ask you information concerning the Evaluation dimension in COMRURAL.</p>	
<b>Accountability Dimension</b>	
<b>Element to be Assessed</b>	Evaluation
Policy Content	<ul style="list-style-type: none"> <li>• Does COMRURAL have rules regarding the evaluation of activities?</li> <li>• Are the objectives of the evaluations communicated clearly?</li> <li>• Is the information from evaluations communicated to both principals/would-be principals and to project officials?</li> <li>• Are principals/would-be principals involved in the evaluation process?</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• Is there an official responsible of supervising the evaluation processes at all levels of the COMRURAL?</li> <li>• Is there a system of incentives and sanctions for employees to ensure compliance with the evaluation policy?</li> <li>• Is there an appeal process for those situations in which principals/would-be principals feel they have wrongly been denied input to the evaluation process?</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>• Is information about the COMRURAL's evaluation policy, evaluation engagement, and evaluation results easily available to principals/would-be principals in appropriate form and through appropriate media?</li> <li>• Are evaluation reports made publicly available?</li> <li>• Are principals/would-be principals prevented from participation in evaluation processes due to technical or financial constraints?</li> </ul>
<p>Lastly, I would like to ask you information concerning the Complaint and Response Mechanisms dimension in COMRURAL.</p>	
<b>Accountability Dimension</b>	
<b>Element to be Assessed</b>	Complaint & Response Mechanisms

Policy Content	<ul style="list-style-type: none"> <li>• Does COMRURAL have rules regarding receiving, investigating and responding to complaints from principals/would-be principals?</li> <li>• Can complaints be filed in relations to any stage of an activity?</li> <li>• Does COMRURAL provide a clear description of the complaint process? This includes: How to file a complaint, investigation, judgement, implementation of response and corrective action.</li> <li>• Can complaints be kept confidential if needed? Is there a non-retaliation policy towards complaints?</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• Is there an official responsible of supervising the evaluation processes at all levels of COMRURAL?</li> <li>• Is there a system of incentives and sanctions for employees to ensure compliance with the complaint &amp; response mechanisms?</li> <li>• Is there an appeal process for both parties? Be it an internal appeal or external process?</li> <li>• Are the people involved in assessing, investigating, and responding to the complaint independent from the subject of the complaint and the complainant?</li> <li>• Do the outputs of the mechanisms include recommendations for corrective and preventive action within the organization?</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>• Is information about COMRURAL's complaint mechanisms and its process easily available to principals/would-be principals in appropriate form and through appropriate media?</li> <li>• Do the requirements for filing a complaint take into account the likely capabilities of the complainants?</li> <li>• Are principals/would-be principals given support or advice in those cases in which they are unable to file a complaint due to technical or financial constraints?</li> </ul>

## Annex #2 Document Disclosure Request

<b>Datos de la Solicitud</b>	Código de la solicitud	SOL-SAG-215-2019
Fecha de solicitud	Lugar	25 de Octubre de 2019 a las 09:15 Bergen, Noruega
<b>Preguntas</b>		
		<p>El documento de evaluación del proyecto del Banco Mundial, a través del cual se aprobó el proyecto COMRURAL, establece que la Secretaría de Agricultura y Ganadería deberá producir documentos donde se expresen las lecciones aprendidas concernientes a la creación y funcionamiento de alianzas productivas, evaluaciones de impacto del proyecto, y casos detallados sobre las Organizaciones de Productores Rurales y alianzas productivas ejecutadas en el proyecto. ¿Pueden facilitarme dichos documentos por vía digital?</p>
		<p>El documento de evaluación del proyecto del Banco Mundial, a través del cual se aprobó el proyecto COMRURAL, hace mención a la creación de alianzas productivas (Cadenas de valor). ¿Pueden facilitarme un registro de las alianzas productivas aprobadas hasta la fecha como parte del proyecto COMRURAL por vía digital?</p>
		<p>El documento de evaluación del proyecto del Banco Mundial, a través del cual se aprobó el proyecto COMRURAL, hace mención a la participación de Organizaciones de Productores Rurales (OPRS) ¿Pueden facilitarme un registro de las Organizaciones de Productores Rurales que han participado hasta la fecha en el proyecto COMRURAL por vía digital?</p>
		<p>El documento de evaluación del proyecto del Banco Mundial, a través del cual se aprobó el proyecto COMRURAL, hace mención a un "Plan para las personas indígenas". ¿Pueden facilitarme dicho plan por vía digital?</p>
		<p>El documento de evaluación del proyecto del Banco Mundial, a través del cual se aprobó el proyecto COMRURAL, hace mención a un Comité de Evaluación de COMRURAL. ¿Pueden facilitarme los documentos concernientes a la creación de dicho comité, sus integrantes, y las evaluaciones que haya realizado hasta la fecha por vía digital?</p>
		<p>El documento de evaluación del proyecto del Banco Mundial, a través del cual se aprobó el proyecto COMRURAL, hace mención de un "Manual Operativo del Proyecto". ¿Pueden facilitarme dicho manual por vía digital?</p>
		<p>Todos los documentos son solicitados con propósitos meramente académicos y forman parte del proceso de recolección de datos para la elaboración de mi tesis de Maestría para obtener el título de Filosofía en Administración Pública en la Universidad de Bergen, Noruega. Dicha investigación estudia los mecanismos de responsabilidad entre Sociedad Civil y el Banco Mundial al momento de implementar sus proyectos (En este caso específico, COMRURAL), por lo tanto cualquier información del proyecto puede ser de utilidad. ¿Pueden facilitarme, de manera digital, todos los documentos en su posesión concernientes a la creación e implementación del proyecto COMRURAL?</p>
		<p>NOTA IMPORTANTE: si no recibe la información en 10 días hábiles o en caso de prorroga 10 días mas, puede proceder a interponer <b>Recurso de Revisión desde aquí</b>, si desea conocer más sobre el tema, puede leer los Artículo 26 de la <b>Ley de Transparencia y Acceso a la Información Pública</b> y 51, 52 y 53 del Reglamento. También Puede llamar a la Oficina de Transparencia del IAIP al teléfono 223131-61 extensión 107, donde gustosamente atenderán sus interrogantes. este esta correcto</p>