Digital Transparency Index for Government Organizations

IRIM
INDEPENDENT RESEARCH INSTITUTE OF MONGOLIA

DIGITAL TRANSPARENCY INDEX 2025

for government organization

Monitoring report

The "Government Organizations' Digital Transparency Index 2025: Monitoring Report" was initiated and conducted by the Independent Research Institute of Mongolia (IRIM) for the 14th year.

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Please cite this report as

IRIM. Digital Transparency Index, UB., 2025

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INTRODUCTION

The concept and principles of transparency

Transparency has become an integral component of modern democratic governance. It refers to the principle of making information related to matters of public interest, such as the activities of government organizations, policy and decision-making processes, and budget and financial expenditures, open and accessible to the public. Ensuring citizens' right to access information is one of the key mechanisms for promoting transparency, and this right is guaranteed through legal instruments at both international and national levels. For instance, the United Nations human rights instruments recognize the right to information as one of the fundamental rights, while Mongolia has guaranteed this right through its Constitution. Ensuring the right to access information increases citizens' ability to monitor government activities, express their views, and participate in decision-making processes. Transparency is therefore not limited to the dissemination of information alone. Rather, it is aimed at fostering accountable governance by communicating to the public, in a clear and understandable manner, the rationale behind government decisions and the progress of their implementation.

Ensuring transparency is a fundamental factor not only in expanding citizens' opportunities to participate in government activities, but also in increasing public trust in the government. Studies have shown that in countries with higher levels of information openness, citizen participation tends to be more active and policy implementation more effective (OECD, 2017). Therefore, transparency is an important precondition for improving the effectiveness of government activities and the quality of public policy.

In the contemporary context, it is no longer sufficient to ensure transparency through traditional forms of information dissemination. There is a growing need to provide information on the activities of government organizations in an open, timely, and accessible manner through digital channels. Accordingly, digital transparency is emerging as a new form of institutional mechanism for effectively ensuring the right to access information and strengthening public participation and oversight in government activities (United Nations, 2020)

Furthermore, international studies emphasize that the systematic and standardized disclosure of government information in digital form plays an important role in increasing government accountability, reducing corruption risks, and strengthening transparent and open relations between the government and citizens (OECD, 2021; World Bank, 2020). Therefore, introducing digital transparency into the operations of government organizations, implementing it effectively within the relevant context, and continuously monitoring and improving it have become one of the key contemporary directions for putting the principles of good governance into practice.

The importance and effects of ensuring digital transparency

The digital transparency of government organizations is not only an important measure of good governance, but also a factor directly linked to improving citizens' quality of life and supporting social development. In an era of rapid advancement in information and technology, the provision of open and accessible information to citizens by governments has become a foundation of democratic governance. Based on the Organisation for Economic Co-operation and Development and World Bank studies digital transparency is considered to be particularly important in the following four main areas.

First, digital transparency plays an important role in strengthening accountable governance. Making information on governance decision-making and budget expenditure open to the public creates the basic conditions for citizens to exercise meaningful oversight. According to a World Bank study in countries where budget information is published in a transparent and open manner, the accuracy of budget execution is, on average, 15 percent higher (World Bank, 2022).

Second, international studies have confirmed that implementing open data policies has an important effect on combating corruption. A comparative study covering 71 countries found that countries with higher levels of open data performance tend to have relatively lower levels of corruption (Rivero, 2020). The OECD and the G20 Anti-Corruption Working Group have also emphasized that open data policies increase transparency in the public sector and serve as an effective tool for combating corruption (OECD, 2017).

Third, informed citizens are better able to participate effectively in policy development and decision-making processes. Research by the Open Government Partnership shows that when citizen participation increases, governments and public institutions tend to become more accountable, innovative, and effective (Open Government Partnership [OGP], 2023).

Fourth, ensuring digital transparency improves the accessibility and timeliness of public services and simplifies the process through which citizens access information. According to UNDP's evaluation report covering the period from 2015 to 2023, in countries that supported digital transformation, the time required to access services decreased, queues were reduced, and transparency improved. These changes made an important contribution to increasing the efficiency of public service delivery (UNDP, 2023).

Therefore, this study uses the above four areas as the methodological basis for assessing digital transparency.

International trends in the digital transparency of government organizations

In order to assess digital transparency based on the four areas discussed above, it is important to examine relevant international trends. At present, international trends in ensuring the digital transparency of government organizations are developing in the following three main directions.

Trend toward open-data-based transparent governance: In recent years, policies aimed at ensuring the digital transparency of government organizations have increasingly developed around open data systems. The OECD's 2023 OURdata Index assessed open government data policies across 36 member countries and 4 accession countries, using more than 670 survey items, and emphasized that open data has become an important tool for addressing pressing social issues. For example, Estonia's rise in the OURdata Index from 23rd place to 4th place between 2019 and 2023 demonstrates the effective implementation of open data policies (OECD, 2023). Publishing government information in machine-readable formats and making it openly available to the public expands the ability of citizens, researchers, and private sector organizations to monitor and analyze policy implementation. The World Bank's Worldwide Governance Indicators (WGI) annually assess governance in more than 200 countries across six dimensions, including voice and accountability, control of corruption, and government effectiveness, and identify openness as a key factor in these indicators (World Bank, 2023). Therefore, international organizations such as the OECD and the World Bank consider open data to be a key policy instrument for strengthening good governance and transparency.

Development of digital transparency based on citizen participation: Contemporary digital transparency policies are developing not only in the direction of publishing information, but also toward legally guaranteeing citizens' right to access information. Currently, 137 of the 193 UN Member States have adopted freedom of information laws, covering 90 percent of the global population. However, one quarter of countries worldwide, or 56 countries, still do not have laws on the right to access information. Between 2020 and 2023, only 10 new laws were adopted, indicating a significant slowdown compared to the pace of the previous decade. Of these 56 countries, 30 are countries with very weak democratic systems, 17 are small states with populations of less than one million, and the remaining 9 are countries in Africa and Asia (McIntosh, 2024). In its 2025 report based on data from 123 countries, UNESCO emphasized the importance of Sustainable Development Goal 16.10.2 on the right to access information, particularly in empowering citizens to participate in decision-making, holding governments accountable, and supporting public participation (UNESCO, 2025).

Institutional reform of transparency based on digital technologies: Developing digital transparency in alignment with advanced technologies such as artificial intelligence, big data, and integrated databases has become a common trend internationally. The United Nations E-Government Survey 2024 provided a comprehensive assessment of e-government development across 193 Member States and, for the first time, included a dedicated section on the use of artificial intelligence. The survey emphasized that significant progress has been made globally in the development of e-

government (DESA, 2024). According to the findings of the survey, the global average of the E-Government Development Index improved significantly, while the share of the population lagging behind in e-government development decreased from 45 percent in 2022 to 22.4 percent in 2024. The UN study highlights that ensuring transparency and accountability is an essential condition for the planning, implementation, and evaluation of e-government. It also notes that the capacity to use advanced technologies such as artificial intelligence is becoming a key indicator for measuring the effectiveness of e-government (DESA, 2024).

Legal environment for the digital transparency of government organizations in Mongolia

In Mongolia, the legal basis for ensuring the transparency of government organizations is established by Article 16.17 of the Constitution of Mongolia, which guarantees citizens' right to access information. It states that citizens have the right "*to seek and receive information except that which the state and its bodies are legally bound to protect as secret*." This provision creates the fundamental conditions for ensuring the transparency of government operations and increasing citizen participation.

In recent years, digital governance policies and programmes have been implemented in phases to strengthen the digital transparency of government organizations. In particular, medium- and long-term policy documents on the development of e-governance include objectives such as establishing integrated government information databases, digitalizing public services, and improving access to information. These objectives are aimed at strengthening digital transparency at the institutional level. Through the gradual development of the legal and policy environment, the conditions are being created to make the operations of government organizations more open and accountable.

Figure 1. Key changes in the legal environment regulating digital transparency

1. Methodology

Purpose and significance of digital transparency monitoring

The principle that "what cannot be measured cannot be improved" can be considered the foundation for the need to assess the digital transparency of government organizations.

Goal of the Digital Transparency Index

The Digital Transparency Index aims to assess, through a unified quantitative methodology, the accessibility, completeness, and standardization of information disclosed by government organizations in the digital environment, as well as the level of implementation of citizens' right to access information. It seeks to provide evidence-based information to government organizations, policymakers, and citizens, and to identify areas for further improvement. The main objectives of the index are:

MEASURE

Calculate the level of digital transparency of 98 state administrative organizations in Mongolia using a unified index and rank them by type of organization

01

COMPARE

Compare the results with those of previous years and identify trends and causes of progress or decline.

02

IDENTIFY

Identify key challenges and good practices through new measures, such as a practical test of the right to access information and the quality of open data

03

RECOMMEND

Provide specific and feasible recommendations for organizations and policymakers

04

Significance and use of the Digital Transparency Index

Assessing digital transparency in a practical and evidence-based manner has the following key significance:

1. **Accountability mechanism:** It enables an assessment, based on actual data, of how government organizations are fulfilling their obligations under relevant laws and regulations related to information disclosure.
2. **Baseline information to support decision-making:** It identifies areas where the implementation of transparency remains weak and generates the baseline information needed for policymaking and effective resource planning.
3. **Opportunity for comparison:** By comparing the performance of organizations, the index creates conditions for disseminating good practices and enabling mutual learning among organizations.
4. **Mechanism for increasing public trust:** As the assessment is conducted regularly each year, it contributes to strengthening the transparency and accountability of government organizations and enhancing citizens' trust in the government.

Organizations are encouraged to use this index as a tool for learning from one another, identifying their capacities, challenges, and constraints in disseminating digital information, and informing the development of relevant policies and strategies in this area.

International analytical framework

The assessment of digital transparency is an important area of research widely implemented at the level of international organizations. The table below presents the key assessment methodologies and tools related to the digital transparency of government organizations.

Drawing on these methodologies, IRIM revised and developed this methodology to reflect Mongolia's legal environment, as well as the specific structure and operational characteristics of government organizations.

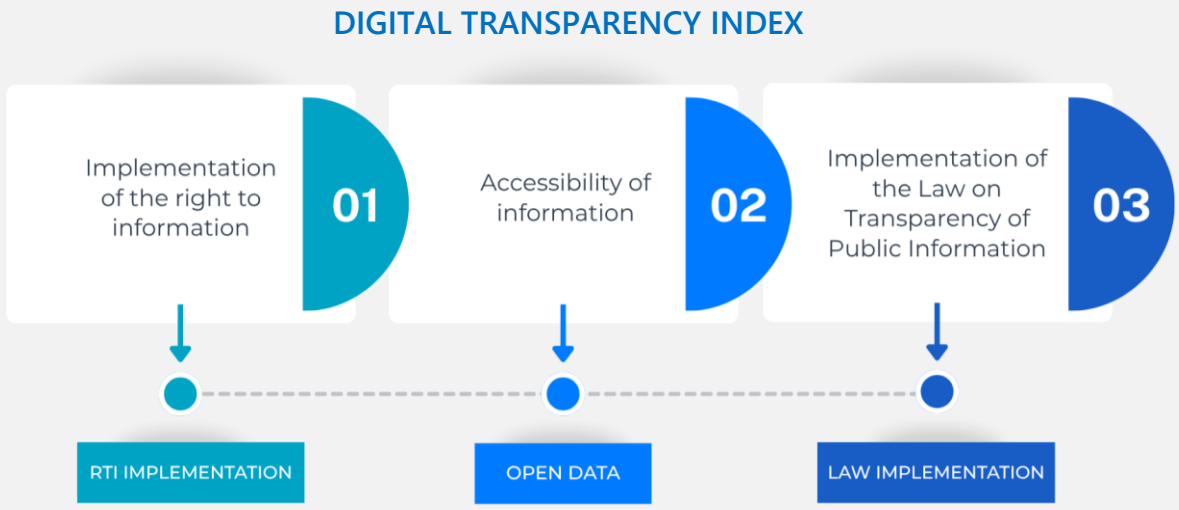
Table 1. International methodologies for measuring digital transparency

Organization	Scope	Key indicators	Methodology
United Nations — EGDI	193 countries	Online services, human capital, infrastructure	Website monitoring + statistical data
Centre for Law & Democracy — RTI Rating	136 countries	Quality and practical implementation of right to information laws	Legal document analysis + practical test
World Wide Web Foundation — Open Data Barometer	115 countries	Availability and quality of open data	Expert assessment + website monitoring
Transparency International — Govt Defence Index	82 countries	Governance transparency and corruption risks	Document review + interviews + website review
OGP — Independent Reporting Mechanism	78 countries	Implementation of commitments and citizen participation	Independent researcher's monitoring report
OECD Digital Government Index	38 countries	Maturity of digital government	Government reporting + validation
IRIM — Digital Transparency Index	99 organizations	Right to access information, and open data	Website review + practical right to information test + open data

Scope of the Digital Transparency Index

Digital transparency cannot be adequately measured through a single indicator alone. As noted in the OECD's study on open data, the right-to-information movement emphasizes the obligation of public institutions to respond to requests for information, while the open government data approach covers the technical and legal aspects of accessing, using, and reusing data. These two approaches therefore complement one another and together form a more comprehensive basis for transparency (OECD, 2013). Even if a government organization publishes a large volume of information on its website, it cannot be considered to have fully ensured transparency if it fails to respond to citizens' requests for information within the required timeframe. Similarly, even when legally required information is published, its social and economic value is limited if it is not provided in an open format or in a form that allows reuse. The lack of consistency in data standards and formats also limits interoperability between systems and reduces the use of data across society. (Chandrasekhar, 2025)

Therefore, in the 2025 assessment, IRIM applied a revised methodology that evaluates the digital transparency of government organizations across three independent yet mutually complementary dimensions: **accessibility of information, implementation of the right to information, and usability of open data**.



Component 1. Implementation of the right to information

The component on the implementation of the right to information is the core element for assessing the digital transparency of government organizations from a rights-based perspective. It aims to determine the extent to which citizens are able to exercise their right to access information in practice, and how this right is implemented in real-world settings.

Within the scope of the assessment, legal and institutional arrangements are examined, including the accessibility of channels for submitting information requests, the clarity of procedures and timeframes for making requests, the transparency of lawful grounds for refusing to provide information, and the availability of mechanisms to appeal decisions. In addition,

the assessment evaluates statistical information on the implementation of information requests and the transparency of related reporting.
In addition, a practical test was used to assess the implementation of information requests under real-world conditions. Requests were submitted for two types of information: information that should already be proactively available, and information that requires a specific timeframe and processing. The assessment examined the timeliness of responses, completeness of the information provided, the official nature of the response, and, in cases of refusal, the legal compliance of the grounds for refusal.

This component is divided into four sub-components and accounts for 40% of the total weight.

Table 2. Structure and weighting of the Right to Information sub-index

RTI-Right to Information
Why is this component important? When a citizen requests information, is the organization able to respond? This component assesses not only whether a mechanism exists, but also whether that mechanism works in practice, through the R4 practical test. Although Mongolia ranks 37th in the UN E-Participation Index, this component identifies weaknesses in the actual response system.
R1 Online access mechanism 8%
R2 Clarity of procedures, timeframes, and grounds for refusal 8%
R3 Statistics and reporting on the resolution of information requests 6%
R4 Practical compliance test — submitting real information requests and receiving responses 18% ★ new
Total weight: 40% · Sub-components: 4 · Total questions: 20

R1: Online access mechanism

This section assessed the extent to which government organizations enable citizens to submit right to information requests online. The assessment considered whether the website includes an online request form, whether an official email address for receiving requests is clearly indicated, whether submitting a request does not require prior registration or special login access, whether guidance on how to submit a request is available, and whether the unit responsible for handling requests and its contact information are clearly provided.

R2: Clarity of procedures

This section assessed whether the legally prescribed response timeframe and conditions for extension are clearly explained; whether the lawful grounds for refusing to provide information are listed; whether the appeal procedure and steps to be followed in cases of refusal are clearly defined; and whether the fee conditions related to obtaining information are clearly specified.

R3: Transparency of implementation

This section assesses whether the organization publicly discloses statistical information on right to information requests. The criteria include whether the total number of requests is reported, whether the data are disaggregated by requests resolved, refused, and transferred, and whether the average time taken to resolve requests is reported.

R4: Practical compliance test

In addition to reviewing website information, the assessment used a practical method of submitting real information requests and measuring the responses received. Based on the right provided under the Law on Public Information Transparency, two types of requests were sent to the registered email addresses of all 98 organizations.

The first request asked for the organization's "employee recruitment and selection procedure," which required relatively minimal effort from the organization. The second request required greater effort, as it asked for a consolidated report on the "number of petitions and complaints received from citizens" over the past three years. The responses were assessed against three criteria: whether the response was received within the legally prescribed timeframe of five working days; whether the requested information was provided in full; and whether the response was official in nature, including a credible explanation with an official source, signature, stamp, and official address.

Calculation

The Right to Information (RTI) score for each organization is calculated using the following formula:

$$\text{RTI}=\frac{R1*8+R2*8+R3*6+R4*18}{40}$$

Here, R1, R2, R3, and R4 each have a score ranging from 0 to 100, while 40 represents the sum of the weights of the sub-components (8+8+6+18=40). The result is expressed on a 0–100 scale.

The average RTI score for the 98 organizations is calculated as follows:

Average RTI = Σ(RTI score of each organization) ÷ 99

Component 2: Transparency of basic information stipulated in the Law on Public Information Transparency

This component aims to assess whether government organizations are, in practice, openly disclosing the information that is legally required to be published through their websites. It is important for determining the basic level of implementation of proactive transparency by each organization.

Within the scope of the assessment, the transparency of information is examined across the following five areas:

- transparency of information on the organization's strategy, functions, structure, and operations;
- transparency of information related to human resource policies and recruitment and selection;
- transparency of budget, financial, and audit information;
- transparency of procurement planning, tender documents, and selection results;

- openness of feedback mechanisms for receiving and resolving citizens' comments and complaints.

This makes it possible to assess whether the organization regularly and systematically publishes essential information for the public in a format that can be reviewed and verified. This component is divided into the following five sub-components and accounts for 40% of the total weight.

Table 3. Structure and weighting of the Open Information sub-index

Open Information-Law on Public Information Transparency
Why is this component important? This component assesses whether organizations have published on their websites the 68 types of information stipulated in the Law on Public Information Transparency. It represents the "basic layer" of digital transparency and is the largest component for measuring whether organizations meet legal disclosure requirements.
D1 Organizational transparency — mission, structure, and performance 8%
D2 Human resource policy — vacancies, procedures, and evaluation 8%
D3 Budget and financial transparency — Glass Account and audit 8%
D4 Procurement transparency — tenders and results 8%
D5 Citizen feedback — polls, appointment schedules, and chat 8%
Total weight: 40% · Sub-components: 5 · Total questions: 35

D1: Organizational transparency

This sub-component examines whether basic information introducing the organization, such as its mission, structure, management composition, and operational reports, is published on the website.

D2: Transparency of human resource policy

This sub-component assesses whether vacancy announcements, employee recruitment and selection procedures, the performance evaluation system, and internal labour regulations are made publicly available.

D3: Financial transparency

This sub-component examines whether budgets, financial reports, and audit conclusions are published within the legally prescribed timeframe in accordance with the requirements of the Glass Account system.

D4: Procurement transparency

This sub-component assesses the transparency of procurement processes, including whether information on tender selection, contract amounts, and results is published.

D5: Citizen feedback

This sub-component assesses whether the website provides appointment schedules for meeting with citizens, electronic channels for receiving comments, chat functions, and options for submitting complaints.

Calculation

The legal compliance score for each organization is calculated using the following formula:

$$DD = \frac{D1+D2+D3+D4}{40}$$

Here, D1–D5 each have a score ranging from 0 to 100, and all sub-components have equal weights of 8% each. The average DD score for the 98 organizations is calculated as follows:

Average DD = Σ(DD score of each organization) ÷ 99

Component 3: Open Data

The open data component aims to assess whether the digital information of government organizations is made available in a way that can be accessed and used in practice by citizens, researchers, and other users. This component seeks to determine not only whether information has been published in the digital environment, but also whether it has been published in a ready-to-use and reusable format.

Within the scope of the assessment, the criteria include whether open data are published in machine-readable formats, whether they are downloadable, whether the date of update and accompanying metadata are provided, whether archives are accessible, the level of data disaggregation, and whether data formats are consistent and reusable.

This makes it possible to comprehensively assess whether government information is provided to users in an accessible, stable, reusable, and practically usable form.

This component is divided into the following four sub-components and accounts for 20% of the total weight.

Table 4. Structure and weighting of the Open Data sub-index

Open Data
Why is this component important? Even if information is available on a website, is it actually accessible to citizens? Is it published in machine-readable formats instead of PDF? In the context of Mongolia's National Big Data and Artificial Intelligence Strategy (2025), the quality of open data is becoming a foundation for artificial intelligence policy.
O1 Open data quality — CSV/XLS format, metadata, and archives **8%**
O2 Navigation and three-click access **4%**
O3 Mobile хэрэглэгчийн хүртээмж, хуваалцах боломж **4%**
O4 Mobile accessibility and shareability **4%**
Total weight: 20% · Sub-components: 4 · Total questions: 21

O1: Open data quality

This sub-component examines whether the information on the organization's website is provided in open formats that can be reused by citizens and researchers. The assessment considered whether information is published in CSV, XLS, or other machine-readable formats, whether metadata or explanatory information is attached, and whether archived information is retained.

O2: Navigation and accessibility of information

This sub-component examines how easily citizens can find the information they are looking for when visiting the website. The criteria include whether users can access the information they need within three clicks and whether the navigation structure is clear and easy to understand.

O3: User accessibility

This sub-component assessed whether mobile users can use the website without difficulty, and whether information can be shared and downloaded.

O4: Technical reliability

This sub-component assessed technical indicators, including whether a secure HTTPS connection is provided, whether the website loading speed is normal, and whether internal links are reliable.

Calculation

The open data score for each organization is calculated using the following formula:

$$\text{OD}= \frac{O1*8+O2*4+O3*4+O4*4}{20}$$

Here, O1, O2, O3, and O4 each have a score ranging from 0 to 100, while 20 represents the sum of the weights of the sub-components (8+4+4+4=20).

The average score for the 99 organizations is calculated as follows:

Average OD = Σ(OD score of each organization) ÷ 99

Index calculation methodology

The Digital Transparency Index of government organizations is calculated as the weighted sum of three main components. The weights of the components are determined not by the number of questions, but by considering the level of policy and methodological significance of each component in defining digital transparency. In calculating the index, the following three components are combined with the respective weights: implementation of the right to information, open data, and transparency of basic information stipulated in the Law on Public Information Transparency.

Digital Transparency Index of government organizations = $\frac{1}{I}\sum_{k=1} i(0.4A_k + 0.2B_k + 0.4C_k)$

A – Implementation of the Right to Informatio (weight: 40%)
B – Open Data (weight: 20%)
C – Open Information / implementation of the Law on Public Information Transparency (weight: 40%)
I – Number of organizations assessed (99)
k – Number assigned to each assessed organization

Each organization's combined score is calculated by multiplying the scores of the three components — A, B, and C — each measured on a 0–100 scale, by their respective weights, and then summing the weighted scores.

Scoring system

Score	Category	Description
1	Fully met	Clearly presented, updated, accessible, and published in full
0.5	Partially met	Available, but incomplete, outdated, or difficult to find
0	Not met	Not available, the link does not work, or the requirement is not met

Index classification levels

Оноо	Ангилал	Тайлбар
≥ 80%	Good	Procedures, resources, and accountability mechanisms for ensuring digital transparency are fully strengthened.
65–79%	Satisfactory	The organization is strengthening its procedures, resources, and accountability mechanisms for information disclosure
50–64%	Moderate	Some indicators are in place, but the capacity to ensure them sustainably needs to be strengthened
35–49%	Unsatisfactory	Basic procedures and resources are in place, but the capacity to ensure them sustainably remains limited
< 35%	Poor	Procedures, resources, and accountability mechanisms for digital information disclosure are almost absent

Scope of data collection

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

Table 5. Organizations covered in calculating the digital transparency of government information

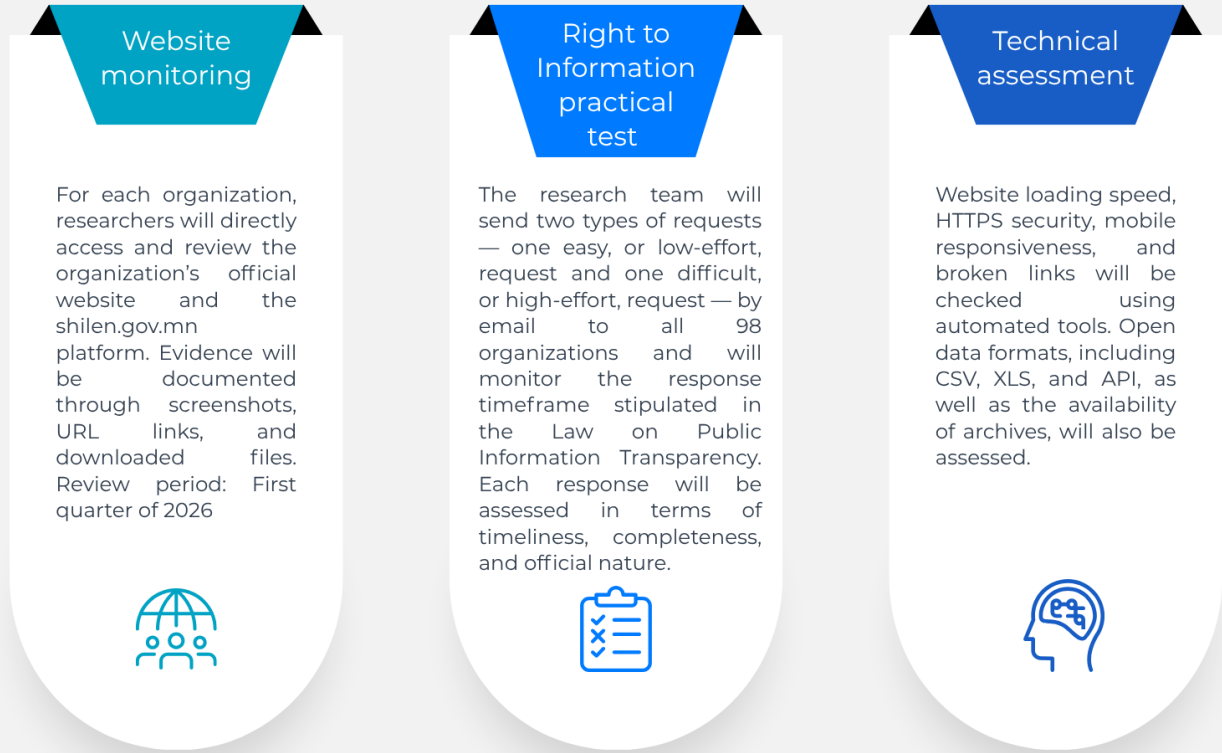
№	Type of organization	Number
1	Ministries of Mongolia	16
2	Implementing agencies	29
3	Regulatory agencies	12
4	Offices of Governors of provinces and the capital city	22
5	Offices of Governors of districts	9
6	Parliamentary bodies	10
	Total	99

The total number of these six types of organizations was 88 in 2021 and 93 in 2022, and has remained at 98 since 2023. On 10 July 2024, pursuant to Resolution No. 13 of the State Great Khural, the name of the Authority for Fair Competition and Consumer Protection was changed to the "Anti-Monopoly Agency." Along with this change, its classification was also changed from a regulatory agency to an implementing agency. In 2025, the Plant Protection Agency was newly added to the list of implementing agencies. However, as the organization currently does not have an official website, it was not included in the 2025 assessment. In compiling the list of state administrative organizations, the relevant legal acts approving the structure and composition of the Government were used as the basis.

Data collection method

The data collection process was carried out using three main methods. To ensure the accuracy of the information, two researchers conducted a verification assessment. In cases where discrepancies arise, the final decision was made by a third researcher.

Figure 2. Data collection method



Reliability of the assessment and quality assurance

To ensure the reliability of the assessment and the validity of the results, a multi-stage quality assurance mechanism was applied throughout all stages of data collection and processing.

First, the assessment of each indicator was conducted based on a pre-developed standardized coding guideline, and each assessment was supported by evidence. This helped reduce differences in scoring among researchers.

Second, the initial assessment was cross-checked and verified by a second independent researcher. In cases where discrepancies arose, they were resolved through discussion and consensus. If consensus could not be reached, a third assessment was conducted and used as the basis for the final decision.

Third, organizations that received scores statistically significantly higher or lower than the average were reviewed again to verify the evidentiary basis of the assessment and the validity of the scoring.

Fourth, an internal review of the database was conducted to check the completeness and logical consistency of the data used in calculating the index, and any erroneous or inconsistent data were corrected.

Through this multi-stage quality assurance approach, the reliability, replicability, and validity of the study results were ensured.

2. Results

The results of the 2025 digital transparency assessment are presented in terms of the overall index, the level of each component, results by type of organization, and an analysis based on the five classification levels.

As the methodology used for this assessment was revised in 2025, direct comparison with the numerical results of the previous year (2024) is limited. Nevertheless, the findings make it possible to identify the general trends and directional changes in the development of digital transparency.

Overall index

2025 OVERALL INDEX

45 /100

Unsatisfactory

$21 \times 0.40 + 43 \times 0.20 + 69 \times 0.40 = 8.4 + 8.6 + 27.6 \approx 45$

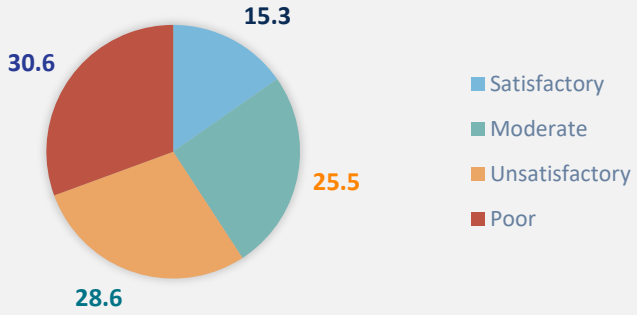
98 organizations | 76 indicators | First quarter of 2026

The 2025 Overall Digital Transparency Index scored 45 out of 100 and was assessed as "Unsatisfactory." This result has limited comparability in numerical terms with the 2024 result of 69%, which was rated as "Satisfactory." This is because the methodology was revised for the 2025 assessment, with the introduction of a practical test to measure the implementation of the Right to Information (RTI) and new indicators on open data, which changed the overall logic of index calculation.

Nevertheless, this result provides an important basis for drawing conclusions about the actual state of digital transparency. While the level of information disclosure on government organization websites remains relatively good, the actual capacity of organizations to respond to citizens' information requests and to provide information in accessible open data formats remains weak. In particular, the results of the RTI practical test documented for the first time that the implementation of the right to information remains insufficient in practice, making this one of the key findings of the study.

Figure 3. Results by component

Figure 4. Results of the Right to Information (RTI) practical test



Approximately 60 percent of the 99 organizations, or the majority, fall under the "Unsatisfactory" and "Poor" categories. Meanwhile, 15 organizations (15%) are classified as "Satisfactory," and no organization reached the "Good" category.

Effect of the methodological revision

The Right to Information (RTI) practical test (R4, with an 18% weight) was implemented for the first time. The fact that the majority of organizations, or more than 88%, did not respond within the legally prescribed timeframe was the main factor that sharply reduced the index score. This reveals, for the first time in quantitative terms, the gap between transparency "on paper" and transparency "in practice."

Changes in digital transparency

IRIM has regularly conducted assessments of government organization transparency since 2010. As the 2025 assessment introduced a revised methodology, direct numerical comparison with the results of previous years is limited. Therefore, in this report, the 2025 results should not be interpreted as a time-series comparison, but rather within the broader context of general trends and substantive changes in the development of digital transparency.

Table 6. Transparency index, by years

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

Year	Index	Classification	Description
2019	51.8	Moderate	The Digital Transparency Index of government organizations was developed and publicly introduced for the first time.
2020	53.7	Moderate	Due to the COVID-19 pandemic, opportunities to collect survey data from organizations were limited. Therefore, the assessment was conducted using the previous methodology, based on website monitoring.
2021	60.2	Moderate	In 2019, Mongolia's legal environment for digital transparency scored 0.65 and was assessed as satisfactory; however, this indicator declined within the following two years.
2022	63.1	Moderate	Although the score increased slightly compared to 2021, the classification remained unchanged at the "Moderate" level.
2023	65.2	Satisfactory	For the first time since the Digital Transparency Index of government organizations began to be measured, the result reached the "Satisfactory" level.
2024	69.0	Satisfactory	Implementation of the Law on Public Information Transparency stabilized, and open information increased by 5.3%.
2025	**45.0**	Unsatisfactory	Methodological revision — the Right to Information (RTI) practical test and the methodology for assessing open data were introduced.

Results by component

The assessment results vary across the three components, with distinct patterns observed in each. Specifically, the implementation of proactive transparency related to the online disclosure of legally required information is at a relatively good level, while the implementation of the right to information and the accessibility of open data remain weak.

This gap indicates that although government organizations are fulfilling their obligation to disclose information to a certain extent, there has been insufficient practical progress in ensuring citizens' right to information and in providing information in reusable formats.

Table 7. Transparency by component

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

Sub-component	Score	Classification
Right to Information →	**24 / 100**	**(Poor)**
R1 — Access mechani	46	Unsatisfactory
R2 — Clarity of procedures	42	Unsatisfactory
R3 — Implementation statistics	22	Poor
R4 — Practical compliance test	8	Poor
Open data →	**41 / 100**	**(Unsatisfactory)**
O1 — Open data quality	20	Poor
O2 — Navigation and accessibility	52	Moderate
O3 — User accessibility	50	Moderate
O4 — Technical reliability	65	Satisfactory
Open information →	**68 / 100**	**(Satisfactory)**
D1 — Organizational transparency	88	Good
D2 — Human resource transparency	72	Satisfactory
D3 — Financial transparency	78	Satisfactory
D4 — Procurement transparency	74	Satisfactory
D5 — Citizen feedback	30	Poor

Implementation of the Right to Information

This component assessed both the mechanisms for the right to information available on the organization's website and their implementation in practice. It accounts for 40 percent of the total weight of the Digital Transparency Index of government organizations. The combined average score of the Right to Information component across the 99 organizations was 24 out of 100, placing it in the "Poor" category.

The results by sub-component are as follows.

Table 8. Results of the Right to Information sub-components

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

Sub-component	Score	Classification	Result
RIGHT TO INFORMATION → 24 / 100 (POOR)			
R1 — Access mechanism	46	**Unsatisfactory**	The average score for R1, the online access mechanism, was 46. This indicates that more than half of the organizations had partially provided an address, form, or guidance for citizens to submit information requests, but had not fully met the requirements.
R2 — Clarity of procedures	42	**Unsatisfactory**	The average score for R2, clarity of procedures, was 42. While a relatively large number of organizations explained the legally prescribed response timeframe, only a few clearly specified the grounds for refusal and the appeal procedure.
R3 — Implementation statistics	22	**Poor**	The average score for R3, implementation statistics, was 22, making it one of the weakest indicators. The majority of organizations did not publish information on the number of information requests received or on how those requests were resolved.
R4 — Practical compliance test	8	**Poor**	The average score for R4, the practical compliance test, was 8. Only 12 percent of organizations responded within the legally prescribed timeframe to the request for the employee recruitment and selection procedure, while only 4 percent responded to the request for a consolidated three-year report on petitions and complaints.

Figure 5. Response types for information requests

These results show that the implementation of the right to information remains of limited practical effect across the majority of organizations.

Table 9. Categories of responses to information requests

Response category	Number	Percentage	Legal assessment
Provided the requested information	3	3%	Fully compliant with the law
Sent a link	11	11%	Partial response — the information was not provided directly; only a website link was sent
Asked about the purpose or reason for requesting the information	3	3%	VIOLATION OF THE LAW - Article 14.1.2 of the Law on Public Information Transparency provides that, when requesting open information, the requester has the right not to explain the purpose or grounds for obtaining the information.
Referred to phone/other channels	10	10%	The Law on Public Information Transparency emphasizes the conduct of government operations in digital form, digital communication with citizens, and the timely and accessible provision of information.
Required submission in writing	4	4%	VIOLATION OF THE LAW — Article 17.1.6 of the Law on Public Information Transparency requires that information requests be resolved and responses be provided in the form chosen by the requester
No response	68	69%	VIOLATION OF THE LAW — Failure to respond within five working days constitutes a violation of Articles 15.6.1 and 15.6.2 of the law

Analysis of the content of responses from the organizations that replied revealed several recurring response patterns:

Table 10. Types of responses to information requests

Type of response	Number	Example response
Sent a link to a Civil Service Council resolution	11	"Resolution No. 25 of 2023 of the Civil Service Council..."
Provided only a phone number	8	"Please contact us by phone at ....."
Referred the request to another person/email address	5	“Please send it to ....."
Required a paper-based request	4	"Please formalize and submit the request in paper form"
Asked why the information was needed	3	"Please send the grounds for how the information will be used"
Sent the actual information/document	3	Sent with an attachment and explanatory note

Among the organizations that responded to information requests, it was common to observe responses such as sending a web link, providing the phone number of the relevant specialist, or referring the request to another unit, rather than providing the requested information within the legally prescribed timeframe. In contrast, cases where the actual information or documents were provided in full were relatively few. Some organizations also imposed additional procedural requirements, such as requiring a paper-based request for a request submitted electronically or asking for the grounds for using the information. These practices create certain barriers to accessing information.

The 68 organizations that did not respond are broken down by type of organization as follows:

Table 11. Distribution of non-responding organizations

Type of organization	Total number	No response	No response rate
Ministries	16	14	88%
Implementing agencies	29	21	70%
Regulatory agencies	12	8	73%
Offices of Governors of provinces and the capital city	22	14	64%
Offices of Governors of districts	9	8	89%
Parliamentary bodies	10	3	30%

The following five organizations were excluded from the results of the Right to Information implementation test because the email could not be delivered or a blank email was received. The official email addresses provided on the organizations' websites were found to be invalid.

Table 12. Organizations with invalid email addresses

№	Organization name	Issue
1	Ministry of Industry and Mineral Resources	Email not delivered — email address not found
2	State Procurement Agency	Email not delivered — email address not found
3	General Authority for Archives	Blank email received
4	General Authority for Development of Persons with Disabilities	Email not delivered — email address not found
5	Dornogovi Province	Email not delivered — email address not found

Key finding from the Right to Information (RTI) practical test

Only 12% of organizations responded to the low-effort request, while only 4% responded to the high-effort request. The majority of organizations that did respond indicated that information requests should be submitted only through an online form, and did not provide the requested information in full. However, the purpose and principles of the Law on Public Information Transparency are directed toward providing information to citizens in a timely, accessible, and digital manner. In this context, "digital form" should not be understood as limited only to a web form, but may include multiple channels such as email, web forms, e-Mongolia, chat systems, and petitions and complaints platforms. This shows that the practical implementation of the right to information lags far behind the legal framework.

A significant difference can be observed when the results of Mongolia's practical test on the implementation of the right to information are compared with international benchmarks. In Ireland, in the third quarter of 2023, government ministries responded to 80% of information requests within the required timeframe (Cabinet Office UK, 2023). In the United Kingdom, in 2024, a total of 83,041 information requests were received, of which 76% were resolved within the legally prescribed timeframe. Among government ministries, this figure reached 89% (Cabinet Office UK, 2025).

Among 67 OGP member countries, 63% have legal provisions for monitoring the implementation of the right to information. However, most do not fully publish implementation statistics (Boyuan Zhao, 2023). Across Asian countries, the level of practical implementation of the right to information varies considerably.

In India, the rate at which information was provided in response to RTI requests varied significantly in 2021–2022. Tamil Nadu, the weakest-performing state, provided only 14% of the requested information, while Maharashtra provided 23%. In contrast, the rate reached 67% in Bihar (Sangathan, 2022).

In Mongolia, however, only 12% of organizations responded to the low-effort request and only 4% responded to the high-effort request, indicating a significantly lower level of performance compared with the 76–89% observed in developed countries. This comparison shows that, although Mongolia has established a legal framework for the right to information, there is a need to improve implementation at the level of actual institutional practice, with greater attention to institutional capacity and response practices.

Open Data

This component assessed the quality, accessibility, and technical reliability of information available on the organization's website, and accounts for 20 percent of the total weight of the Digital Transparency Index of government organizations.

The combined average score of the Open Data component across the 99 organizations was 41, placing it in the "Unsatisfactory" category. The results by sub-component are as follows.

Table 13. Results of the Open Data sub-components

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

Sub-component	Score	Classification	Result
OPEN DATA → 41 / 100 (Unsatisfactory)			
O1: Open data quality	20	**Poor**	The average score for O1, open data quality, was 20, making it the weakest indicator. The majority of organizations publish information in PDF format, while very few use machine-readable formats such as CSV or XLS.
O2: Navigation and accessibility	52	**Moderate**	The average score for O2, navigation and accessibility of information, was 52. Although more than half of the organizations had a relatively user-friendly navigation structure, only a few fully met the standard of enabling users to access information within three clicks.
O3: User accessibility	50	**Moderate**	The average score for O3, user accessibility, was 50. Although mobile compatibility has improved, the ability to share and download information remains limited.
O4: Technical reliability	65	**Satisfactory**	The average score for O4, technical reliability, was 65, making it the highest performing of the four sub-components. Most organizations had secure HTTPS connections in place; however, broken internal links remained a common issue.

According to the results of the OECD's 2023 OURdata Index, only 48% of high-value datasets are publicly accessible as open data, while datasets related to finance and public accountability are rarely published openly. (CPI, 2024)

The index, which covers 40 countries, shows that Korea, France, Poland, and Estonia are leading performers. In 80–89% of OECD countries, high-value data are published in open and machine-readable formats. However, the criteria for metadata quality and API access are met by only around 50% of datasets. While OECD countries perform relatively well in terms of data availability and accessibility, additional efforts are still needed to work with external stakeholders and promote data reuse (CPI, 2024).

In Mongolia, the majority of organizational information is published in PDF format, while the use of machine-readable formats remains limited. This indicates a significant gap compared with the OECD benchmark of 80–89%.

Open Information and Public Information Transparency

This component examines whether organizations have published on their websites the 68 types of information stipulated in the Law on Public Information Transparency, and accounts for 40 percent of the total weight.

The combined average score of the Open Information component across the 99 organizations was 68, making it the highest-performing of the three components. The results by sub-component are as follows.

Table 14. Results of the Open Information sub-components

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

Sub-component	Score	Classification	Result
OPEN INFORMATION → 68 / 100 (Satisfactory)			
D1: Organizational transparency	88	**Good**	The average score for D1, organizational transparency, was 88, making it the highest performing indicator. The majority of organizations regularly publish their mission, structure, and performance reports.
D2: Human resource transparency	72	**Satisfactory**	The average score for D2, human resource policy, was 72. Although the number of organizations publishing vacancy announcements and recruitment and selection procedures has increased in recent years, relatively few organizations publish their performance evaluation systems.
D3: Financial transparency	78	**Satisfactory**	The average score for D3, financial transparency, was 78. The introduction of the Glass Account system has significantly improved the publication of financial information; however, fewer than half of all organizations publish their audit reports within the required timeframe.
D4: Procurement transparency	74	Satisfactory	The average score for D4, procurement transparency, was 74. Although the number of organizations publishing tender notices has increased, few organizations publish contract results and performance reports.
D5: Citizen feedback	30	Poor	The average score for D5, citizen feedback, was 30, making it the weakest indicator. Only a very small share of organizations provides digital channels for communicating with citizens, such as chat functions, feedback forms, or online complaint submission systems.

Ranking of organizations by the five classification levels

The tables below rank all 99 organizations by each of the six categories: ministries, implementing agencies, regulatory agencies, Offices of Governors of provinces and, Offices of Governors of the capital city and districts, and parliamentary bodies. The score represents each organization's overall Digital Transparency Index, calculated as the weighted sum of three components: Right to Information (RTI) (40%), Open Data (20%), and Open Information and implementation of the Law on Public Information Transparency (40%).

Table 15. Transparency Index by type of organization

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

Type of organization	Number	Average score	Classification
Parliamentary bodies	10	55	Moderate
Ministries	16	52	Moderate
Regulatory agencies	12	46	Unsatisfactory
Implementing agencies	29	43	Unsatisfactory
Offices of Governors of provinces and the capital city	22	43	Unsatisfactory
Offices of Governors of the districts	9	39	Unsatisfactory

Table 16. Transparency Index by ministry

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

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
Total 16 organizations · Average score 52 / 100						
1	Ministry of Finance	75	Satisfactory	59	71	94
2	Ministry of Digital Development, Innovation and Communications	75	Satisfactory	56	77	92
3	Ministry of Economy and Development	70	Satisfactory	51	66	90
4	Ministry of Education	65	Satisfactory	46	62	86
5	Ministry of Health	62	Moderate	42	59	84
6	Ministry of Family, Labour and Social Protection	60	Moderate	40	57	82
7	Ministry of Environment and Climate Change	58	Moderate	37	54	80
8	Ministry of Urban Development, Construction and Housing	55	Moderate	33	55	78
9	Ministry of Culture, Sports, Tourism and Youth of Mongolia	52	Moderate	29	52	76
10	Ministry of Mining and Heavy Industry	49	Unsatisfactory	27	49	72
11	Ministry of Energy	47	Unsatisfactory	24	47	70
12	Ministry of Justice and Home Affairs	43	Unsatisfactory	19	43	67
13	Ministry of Foreign Affairs	39	Unsatisfactory	16	39	63
14	Ministry of Defence	35	Unsatisfactory	11	33	59
15	Ministry of Road and Transport	27	Poor	6	24	49
16	Ministry of Industry and Mineral Resources	24	Poor	5	21	45

Table 17. Transparency Index by implementing agency

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

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
Total 29 organizations · Average score 43 / 100						
1	Mongolian Tax Administration	79	Satisfactory	65	77	94
2	General Authority for State Registration of Mongolia	77	Satisfactory	60	75	94
3	General Department of Health Insurance	75	Satisfactory	59	71	93
4	General Department of Customs	74	Satisfactory	57	74	92
5	State Procurement Agency	71	Satisfactory	54	69	90
6	Mineral Resources and Petroleum Authority of Mongolia	63	Moderate	43	62	84
7	Regulatory Agency of Government Digital Services	58	Moderate	35	58	82
8	General Authority for Education	57	Moderate	34	56	80
9	General Department of Social Insurance	54	Moderate	30	53	78
10	Government Agency for Policy Coordination on State Property	52	Moderate	28	48	77
11	General Department of Labor and Welfare Services	50	Moderate	25	46	76
12	Cabinet Secretariat of the Government of Mongolia	45	Unsatisfactory	19	41	72
13	Investment and Trade Agency of Mongolia	42	Unsatisfactory	15	41	70
14	General Executive Agency of Court Decision	40	Unsatisfactory	14	38	67
15	National Forensic Agency of Mongolia	40	Unsatisfactory	14	38	67
16	General Department of Veterinary Medicine	37	Unsatisfactory	13	31	63
17	Medicines and Medical Devices Regulatory Agency	36	Unsatisfactory	11	34	61
18	General agency for land administration and management, geodesy and cartography	34	Poor	11	29	59
19	National Geological Service	31	Poor	8	27	57
21	General Authority for Archives	27	Poor	6	23	51
21	Immigration Agency of Mongolia	26	Poor	6	21	49
22	Intellectual Property Office of Mongolia	26	Poor	6	23	47
23	National Agency for Meteorology and Environmental Monitoring	23	Poor	5	17	43
24	General Authority for Child and Family Development and Protection	21	Poor	5	15	41
25	Water Agency	19	Poor	2	14	39

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
26	General Authority for Development of Persons with Disabilities	21	Poor	5	15	41
27	Forest Agency	20	Poor	6	12	37
28	Department of Culture and Arts	18	Poor	5	10	35
29	Small and Medium Enterprises Agency	17	Poor	5	8	33

Table 18. Transparency Index by regulatory agency

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

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
Total 12 organizations · Average score 46 / 100						
1	Communications Regulatory Commission of Mongolia	73	Satisfactory	57	69	91
2	General Intelligence Agency of Mongolia	64	Moderate	43	60	87
3	General Authority for Border Protection	60	Moderate	38	56	84
4	Mongolian Agency for Standard Metrology	60	Moderate	38	60	82
5	National Police Agency	54	Moderate	30	53	78
6	National Emergency Management Agency	47	Unsatisfactory	20	46	74
7	Civil Aviation Authority of Mongolia	44	Unsatisfactory	18	42	72
8	General Staff of the Armed Forces	39	Unsatisfactory	14	39	65
9	Energy Regulatory Commission	36	Unsatisfactory	11	34	61
10	Anti-Monopoly Agency	29	Poor	8	25	53
11	General Agency for Specialized Inspection	25	Poor	5	19	47
12	State Committee of Physical Education and Sports	22	Poor	5	17	41

Table 19. Transparency Index by province and capital city

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

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
Total 23 organizations · Average score 43 / 100						
1	Orkhon Province	71	Satisfactory	54	68	90
2	Darkhan-Uul Province	67	Satisfactory	48	63	87
3	Umnugovi Province	63	Moderate	43	58	86
4	Selenge Province	60	Moderate	38	56	84
5	Khuvsgul Province	56	Moderate	32	53	82
6	Dornod Province	51	Moderate	27	42	80
7	Khovd Province	52	Moderate	28	46	78
8	Office of the Governor of the Capital City	52	Moderate	28	48	77
9	Uvurkhangai Province	50	Moderate	40	58	40
10	Arkhangai Province	49	Unsatisfactory	25	44	76
11	Bulgan Province	45	Unsatisfactory	19	41	72
12	Office of the Mayor of Ulaanbaatar City	45	Unsatisfactory	19	42	72
13	Khentii Province	42	Unsatisfactory	17	35	70
14	Sukhbaatar Province	38	Unsatisfactory	14	32	65
15	Dornogovi Province	36	Unsatisfactory	12	29	63
16	Bayan-Ulgii Province	35	Unsatisfactory	12	27	61
17	Tuv Province	31	Poor	9	25	57
18	Zavkhan Province	29	Poor	6	24	55
19	Govi-Altai Province	27	Poor	5	21	53
20	Uvs Province	26	Poor	6	19	49
21	Bayankhongor Province	24	Poor	5	15	47
22	Dundgovi Province	23	Poor	5	14	45
23	Govisumber Province	20	Poor	5	12	40

Table 20. Transparency Index by district

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

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
Total 9 organizations · Average score 39 / 100						
1	Khan-Uul District	52	Moderate	28	52	76
2	Bayanzurkh District	51	Moderate	28	46	76
3	Songinokhairkhan District	48	Unsatisfactory	24	42	74
4	Bayangol District	42	Unsatisfactory	17	37	70
5	Sukhbaatar District	39	Unsatisfactory	14	33	67
6	Chingeltei District	35	Unsatisfactory	12	27	61
7	Nalaikh District	26	Poor	6	21	49
8	Baganuur District	21	Poor	5	15	39
9	Bagakhangai District	18	Poor	5	12	33

Table 21. Transparency Index by parliamentary body

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

№	Organization name	Total	Classification	Right to Information	Open Data	Open Information
Total 10 organizations · Average score 55 / 100						
1	Bank of Mongolia	73	Satisfactory	57	69	91
2	Mongolian National Audit Office	71	Satisfactory	54	68	90
3	General Intelligence Agency of Mongolia	64	Moderate	43	60	87
4	National Human Rights Commission of Mongolia	63	Moderate	43	62	84
5	General Election Commission of Mongolia	63	Moderate	41	60	87
6	Independent Authority Against Corruption	60	Moderate	38	56	84
7	State Great Khural of Mongolia	54	Moderate	30	50	80
8	Cabinet Secretariat of the Government of Mongolia	45	Unsatisfactory	19	41	72
9	National Geological Service	31	Poor	8	27	57
10	National Committee on Gender Equality	19	Poor	2	14	39

3. Conclusion and reccomendations

Conclusion

According to the 2025 Digital Transparency Index assessment, the combined average score of 99 government organizations in Mongolia was 45 out of 100, placing the overall result in the "Unsatisfactory" category. Although the implementation of the Law on Public Information Transparency has relatively stabilized and was assessed as "Satisfactory," the lower performance in the other components contributed to the overall result being assessed as "Unsatisfactory." The relatively high score in the legal compliance component reflects the fact that, in recent years, practices such as the Glass Account system and the online disclosure of information have become more established. However, the implementation of the Right to Information, with a score of 24, and Open Data, with a score of 41, form the basis of the key conclusions of this report.

The practical fulfilment of the Right to Information remains "Poor" 24/100

The most important element of the revised 2025 methodology was the practical test, which involved sending actual information requests and measuring the responses received. Two types of requests were sent to the registered email addresses of all 99 organizations, based on the right provided under the Law on Public Information Transparency. The results show that although 88% of organizations had an information request form or email address, 69% did not respond at all within the legally prescribed timeframe of five working days. Even among the organizations that did respond, only 3% provided the requested information in full and in a form that met the requirements. In other cases, organizations sent website links or phone numbers, required paper-based requests, or asked requesters to explain the purpose of the request. Some of these practices may be considered direct violations of the law.

This highlights one of the key findings of the 2025 assessment: there is a significant gap between transparency "on paper" and transparency "in practice."

This does not appear to be an isolated issue, but rather a systemic weakness. In other words, most organizations have not yet established internal accountability systems, monitoring mechanisms, or procedures to ensure compliance with response timeframes for receiving, processing, and responding to information requests.

The usability of open data remains "Unsatisfactory" 41/100

The Open Data component scored 41 out of 100, indicating that although information is being published, its usefulness for analysis and reuse remains limited. The majority of organizations publish information in PDF format, which may be suitable for citizens to read, but is difficult to process by computer, analyze as data, or reuse. In contrast, fewer than 20% of all organizations use machine-readable open formats such as CSV, Excel, or API.

This is not merely a technical issue. In 2025, Mongolia developed the draft National Strategy for Big Data and Artificial Intelligence and prepared it for submission to the State Great Khural. However, the ability to use artificial intelligence, integrate and analyze data, and introduce data-driven solutions in public services and policymaking is directly linked to the quality, structure, and standards of the data published by each organization. In an environment where data remain unstructured, outdated, and non-

standardized, the effective implementation of technological advances and AI-based solutions will continue to be limited.

Open Information — legal compliance has stabilized at a "Satisfactory" level 68/100

In terms of implementation of the Law on Public Information Transparency, compliance with the 68 types of information that are legally required to be disclosed scored 68 out of 100, making this the highest performing of the three components. The fact that the majority of organizations now regularly publish information on their structure, management, finances, and procurement represents tangible progress made in recent years.

However, the mere publication of information does not necessarily mean that effective oversight is possible. Issues such as the limited publication of audit conclusions on financial reports by more than half of the organizations, and delays in publishing Glass Account information, remain common. Transparency is not only about publishing information, but also about creating the conditions for oversight. Therefore, greater attention should be paid to publishing information in a timely, clear, and understandable manner so that it remains meaningful and useful for citizens.

The gap between organizations is widening — a 60-point difference

The Transparency Index scores of the leading organizations range from 75 to 79, while the lowest-scoring organizations scored between 17 and 19, indicating a gap of more than 60 points. Among the leading organizations, data management, qualified human resources, and technological solutions are relatively well established, whereas weaker-performing organizations lack these factors across the board.

From a geographical perspective, provinces with mining-related revenues, such as Orkhon and Darkhan-Uul, scored higher, while most western and remote provinces scored below 30. This reflects inequalities in resources and infrastructure. The fact that Nalaikh, Baganuur, and Bagakhangai districts of the capital city consistently show the lowest performance indicates the need for special attention to infrastructure and human resource allocation.

Reccomendations

Recommendations for the Government

First, the monitoring of the implementation of the Right to Information should be established as a policy requirement. A legal requirement should be introduced for each organization to designate an officer responsible for information requests and to establish internal procedures for handling such requests. A technological system should also be developed to monitor compliance with legally prescribed response timeframes electronically and to compile and publish national-level statistics on the results each year. Publicly disclosing the organizations that fail to respond would be the simplest, yet most practical, accountability lever.

Second, although regulations related to the creation and publication of open data, as well as the Regulation on the Operation of the Integrated State Open Data System, are already in force, the level of implementation varies across organizations. Therefore, there is a need to enforce requirements for open data formats, structure, quality, and regular updates in a more unified manner.

Third, the proposed five-level classification should be used as a policy tool. Capacity-building training and technical assistance programmes should be implemented for the 58 organizations classified as "Poor" and "Unsatisfactory."

Recommendations for state administrative organizations

First, organizations should establish an internal system for responding to information requests. Establishing a clear sequence of procedures for receiving requests, forwarding them to the responsible officer, monitoring response timeframes, and sending responses should be treated as an immediate priority. Improving the process for compiling and reporting statistics and outcomes related to such requests is also important for ensuring the implementation of the Right to Information.

Recommendations for civil society and researchers

First, the practical test of the Right to Information should be conducted independently on an annual basis. Civil society organizations should regularly assess whether organizations respond within the legally prescribed timeframe and whether the responses provided meet legal requirements, and should communicate the results to the public. This would enrich IRIM's assessment with an additional independent source of evidence.

Second, guidance on how to submit Right to Information requests should be made more accessible to citizens. The results of the practical test in this study show that some organizations create additional barriers, such as requiring requesters to explain the purpose or grounds of their request, or requiring paper-based submissions, contrary to the law. Citizens' awareness that they are not required to explain the purpose of their request when exercising their right to information is important for enabling them to respond to such violations and protect their rights.

Third, surveys should be conducted among citizens at regular intervals. Even if a website performs well in terms of technical indicators, whether citizens can actually access information in practice is a separate issue to be assessed. Surveys that directly capture citizens' experiences would complement the Digital Transparency Index and provide a more complete picture of the digital transparency of government organizations.

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Annex 1. Five-level ranking of organizations

Ranking of all 99 organizations by overall index score, classified into five levels

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

Level	Rank	Organization name	Digital Transparency Index
≥ 80 Good	No organization was assessed at this level.		
65–79 Satisfactory Information is published, but standards are not uniform	1	National Statistics Office	79
	2	Mongolian Tax Administration	79
	3	General Authority for State Registration of Mongolia	77
	4	Ministry of Finance	75
	5	General Department of Health Insurance	75
	6	Ministry of Digital Development, Innovation and Communications	75
	7	General Department of Customs	74
	8	Communications Regulatory Commission of Mongolia	73
	9	Bank of Mongolia	73
	10	Mongolian National Audit Office	71
	11	State Procurement Agency	71
	12	Orkhon Province	71
	13	Ministry of Economy and Development	70
	14	Darkhan-Uul Province	67
	15	Ministry of Education	65
50–64 Moderate Transparency is incomplete and needs to be strengthened	16	General Intelligence Agency of Mongolia	64
	17	National Human Rights Commission of Mongolia	63
	18	Mineral Resources and Petroleum Authority of Mongolia	63
	19	General Election Commission of Mongolia	63
	20	Umnugovi Province	63
	21	Ministry of Health	62
	22	Ministry of Family, Labour and Social Protection	60
	23	Selenge Province	60
	24	Mongolian Agency for Standard Metrology	60
	25	Independent Authority Against Corruption	60
	26	General Authority for Border Protection	60
	27	Regulatory Agency of Government Digital Services	58
	28	Ministry of Environment and Climate Change	58
	29	General Authority for Education	57
	30	Khuvsgul Province	56
	31	Ministry of Urban Development, Construction and Housing	55
	32	National Police Agency	54
	33	General Department of Social Insurance	54
	34	State Great Khural of Mongolia	54
	35	Government Agency for Policy coordination on State property	52
	36	Khovd Province	52
	37	Ministry of Culture, Sports, Tourism and Youth of Mongolia	52
	38	Office of the Governor of the Capital City	52
	39	Khan-Uul District	52

Level	Rank	Organization name	Digital Transparency Index
	40	Dornod Province	51
	41	Bayanzurkh District	51
	42	General Department of Labor and Welfare Services	50
	43	Uvurkhangai Province	50
35–49 Unsatisfactory Information is limited	44	Arkhangai Province	49
	45	Ministry of Mining and Heavy Industry	49
	46	Songinokhairkhan District	48
	47	Ministry of Energy	47
	48	National Emergency Management Agency	47
	49	Office of the Mayor of Ulaanbaatar City	45
	50	Cabinet Secretariat of the Government of Mongolia	45
	51	Civil Aviation Authority of Mongolia	44
	52	Bulgan Province	45
	53	Ministry of Justice and Home Affairs	43
	54	Khentii Province	42
	55	Bayangol District	42
	56	Investment and Trade Agency of Mongolia	42
	57	National Forensic Agency of Mongolia	40
	58	General Executive Agency of Court Decision	40
	50	Sukhbaatar District	39
	60	Ministry of Foreign Affairs	39
	61	General Staff of the Armed Forces	39
	62	Sukhbaatar Province	38
	63	Medicines and Medical Devices Regulatory Agency	37
	64	General Department of Veterinary Medicine	37
	65	Financial Regulatory Commission	36
	66	Energy Regulatory Commission	36
	67	Dornogovi Province	36
	68	Ministry of Defence	35
	69	Bayan-Ulgii Province	35
	70	Chingeltei District	35
< 35 Poor Information is limited	71	General Authority for Land Administration, Geodesy and Cartography	34
	72	Civil Service Council	32
	73	Tuv Province	31
	74	National Geological Service	31
	75	Anti-Monopoly Agency	29
	76	Zavkhan Province	29
	77	Ministry of Road and Transport	27
	78	General Authority for Archives	27
	79	Govi-Altai Province	27
	80	Immigration Agency of Mongolia	26
	81	Intellectual Property Office of Mongolia	26
	82	Uvs Province	26
	83	Nalaikh District	26
	84	General Agency for Specialized Inspection	24
	85	Ministry of Industry and Mineral Resources	24
	86	Bayankhongor Province	24

Level	Rank	Organization name	Digital Transparency Index
	87	National Agency for Meteorology and Environmental Monitoring	23
	88	Dundgovi Province	23
	89	State Committee of Physical Education and Sports	22
	90	General Authority for Child and Family Development and Protection	21
	91	Baganuur District	21
	92	General Authority for Development of Persons with Disabilities	21
	93	Forest Agency	20
	94	Govisumber Province	20
	95	Water Agency	19
	96	National Committee on Gender Equality	19
	97	Department of Culture and Arts	18
	98	Bagakhangai District	18
	99	Small and Medium Enterprises Agency	17