

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
GENERAL OBJECTIV 1 – PREVENTING CORRUPTION IN PUBLIC INSTITUTIONS							
Specific objective 1.1.	Addressing the public institutions' specific vulnerabilities by systematic implementation of preventive measures						
Measure 1.1.1	Carrying out the periodical self-assessment of the degree of implementation of the mandatory preventive measures (stipulated in annex no. 2 to the decision)	Data and information collected for all indicators included in the inventory	First self-assessment report elaborated and sent to the Technical Secretariat of NAS	Lack of a systematic collection mechanism for the required data The absence of the working procedures	The coordinator of the sectorial strategy	Limited to the approved budget	1 st semester of 2012 and semestrial
Measure 1.1.2	Enhancing the activities of implementing internal/managerial control systems at the main credits chief accountants of the state budget, social securities budget and any special fund budget, including the subordinated public institutions ¹	No. of elaborated procedures No. of the inventoried sensitive functions No. of risks indentified evaluated and registred in the Risks Register The degree of conformity of the internal/ managerial control system on 31.12.20..	The programme for developing the internal control/managerial system approved Approved procedures Process to inventory the sensitive public positions finalised Risk registry filled in Report on the	A non-in-depth evaluation of all managerial/internal control standards	The management of the public institution	Limited to the approved budget	Permanent measure with semestrial assesment

¹ The managerial/internal control standards are elaborated on the basis of the Government Ordinance no. 119/1999 on the on the internal/managerial control and the preventive financial control, republished, with further amendments, approved through the Order of the Minister of Public finances no. 1649/2011 on amending the Order of the Minister of Public Finances no. 946/2005 for approving the Code of internal/managerial control, including the managerial/internal control standards at the public entities, as well as the standards for developing the internal/managerial control systems, republished in the Official Journal of Romania, Part I, no. 449 from July 5, 2011.

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
			internal/ managerial control system on 31.12.20..				
Measure 1.1.3	Gradually introducing a unitary methodology for the assessment of the corruption risks at the level of public institutions, as a premise for developing the internal integrity plans	<p>Minimum three institutions selected for testing the risks assessment methodology</p> <p>Complete implementation of the evaluation cycle stages in at least three public institutions</p> <p>No. and type of the identified risks</p> <p>No. and type of the adopted preventive measures</p>	<p>Final summary report on the results of the testing methodology for assessing the risk of corruption</p> <p>Integrity plans drafted and approved by the three institutions</p> <p>Draft normative act for the approval of the methodology as a mandatory instrument</p>	Insufficient human resources for performing the assessment	<p>Public institutions in cooperation with MAI - GAD and MoJ</p> <p>Cooperation with MAI - NACS</p>	Limited to the approved budget	1st semester 2013
Measure 1.1.4	Implementing the Code of conduct for avoiding incompatibility and conflicts of interests situations by the personnel involved in the management of programs financed through post accession non-refundable funds	<p>The training of trainees component and dissemination of the code's provisions to the recipients</p> <p>Semestrial reporting according to annex no. 1 to the decision</p>	<p>Self-assessment provided under 1.1.1</p> <p>Website MEA</p>	Insufficient financial resources for the training of trainers/dissemination component	MEA	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 1.1.5	Enhancing the statute and the role of the ethical counsellor	<p>Recommendations for enhancing the statute and role of the ethical counsellor issued</p> <p>No. of amendments on the legal framework in force proposed and adopted</p> <p>No. of ethical counsellors nominated</p>	<p>Assessment report of the ethical counsellor institution (part of the thematic missions system within NAS' monitoring system)</p> <p>Statistical data provided in the self-</p>	<p>Delays in adopting the normative act</p> <p>Insufficient financial resources for performing the activity and ensuring the access to professional</p>	NAS technical secretariat in cooperation with MAI - NACS	Limited to the approved budget	2013

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		Establishing the ethical counselling as a main activity Hierarchical subordination of the ethical counsellor to a higher level	assessment process provide under 1.1.1 Normative act adopted	training			
Measure 1.1.6	Making call-centre systems operational, in order to facilitate the notification of irregularities and of possible corruption acts	No. of technical solutions adopted at the level of institutions No. of notifications received No. of disciplinary infringements/ offences ascertained by the competent institutions	Decisions of the disciplinary commissions/ courts	Failing to grant the human and financial resources necessary for a call-center functioning Notifications exceeding the competences of the notified institutions	The management of the public institution	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 1.1.7	Implementing international standards and promoting an active role of Romania within the regional and international anticorruption initiatives	The rate of implementing the recommendations of the international organizations to which Romania is part of (GRECO, CVM, EC Report, UN, ect.) Regional and international programs and strategies in which institutions from Romania are actively involved No. of actions accomplished in cooperation with the International Anticorruption Academy	Independent evaluation reports Intermediate or final reports Self-assessment report on the implementation of UNCAC	Delays in the adoption of the normative acts or the administrative orders recommended Failing to grant the human and financial resources necessary for the effective involvement in international programs	MOJ, MAI, PM, NIA and SCM	Limited to the approved budget	Permanent measure with semestrial assessment
Specific objective 1.2.	Increasing the institutional transparency by increasing the availability of public data made available by public authorities						
Measure	Carrying out the procedures to	Action plan for accomplishing	Approving, by	Failing to grant	MFA, MoJ,	Limited to the	March 2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
1.2.1	join the OGP	the OGP objectives Public consultations Signing, by Romania, the OGP Declaration	Government, the action plan	the necessary and financial resources for the implementation of the action plan	MCIS, MPF	approved budget	
Measure 1.2.2	Ensuring the compliance with the provisions on access to public information and transparency of decision-making process	No. and types of public interests information published by own initiative The rate of reply to the requests for information Sanctions applied for breaching the obligations of transparency of the decision making and ensuring the acces to information of public interest by making them public ex officio The rate of contesting in court the adopted decisions or measures The rate of implementation of the recommendations within the annual reports	Official websites Statistical data provided in the self-assessment process under 1.1.1 Assessment report of the legislative and institutional framework (part of the thematic missions system within NAS' monitoring system) Activity reports published Court decisions	Limited access to web pages Proceedings duration Non-application of disciplinary sanctions for non-compliance with the legal obligations	GSG Public relations compartments or nominated persons from the public institutions	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 1.2.3	Developing the e-governance, e-administration and e-justice solutions as platforms for citizens' accessing the public services	Developed platforms No. of users The frequency of using Types of services provided	Official website Activity reports	Failing to provide the necessary resoruces Limited internet access	The management of the institution The coordinator of the sectoral plan	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 1.2.4	Implementing projects for promoting integrity and good governance in partnership with the civil society	Cooperation protocols No. of joint projects with the NGOs that are leading to the achievement of the NAS' objectives	Reports and public information Publications	Failing to provide the necessary resoruces	The management of the institution The coordinator of the sectoral plan	Limited to the approved budget	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		No. of projects financed according to the Law no. 350/2005 on the regime of non-reimbursable financing from public funds allocated for nonprofit activities of general public interest, subsequently amended and supplemented					
Measure 1.2.5	Improving the communication strategy on anticorruption topics – with special focus on managing the relations with the public and mass media	No. of press releases No. of answers to media requests No. of TV shows	Updated strategies of communication	Formal document Failing to provide the necessary resources	The management of the institution The coordinator of the sectoral plan	Limited to the approved budget	Permanent measure with semestrial assessment
Specific objective 1.3.	Strengthening the integrity and transparency of the judiciary by promoting anticorruption measures and professional ethical standards						
Measure 1.3.1	Implementing the strategy on the integrity within the judiciary	No. of accomplished objectives Best practices developed Sending the periodical progress reports to the NAS' technical secretariat Participation to the NAS' monitoring mechanism (platform meetings, semestrial coordination meetings, evaluation missions)	SCM's decision to assess and update the strategy Periodical progress reports GRECO's evaluation and compliance report in the 4th evaluation round „Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors”	Formal document Failing to provide the necessary resources Low level of participation and involvement of the representatives of courts and prosecutor's offices	SCM, HCCJ, PM, courts and prosecutor's offices	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 1.3.2	Reforming the disciplinary judiciary system by strengthening the role and the statute of the Judicial Inspection	Making the Judicial Inspection operational following the new legal framework Financial and human resources No. of notifications	Adoption of the draft law for amending the Law no. 303/2004 on the statute of judges and prosecutors and Law	Failing to provide the resources necessary to make the Judicial Inspection operational	MoJ and SCM	Limited to the approved budget	1 st semester 2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		No. and type of sanctions applied The rate of confirmation/rejection by the court on types of misbehaviours	no. 317/2004 on the Superior Council of Magistracy				
Measure 1.3.3	Cooperating in the integrity field with the representative institutions and organizations of the legal and related professions	No. of meetings and consultations No. of identified risks No. of preventive measures adopted Conclusions and recommendations issued No. and type of disciplinary misbehavior No. and type of sanctions applied The rate of confirmation/rejection by the court on types of misbehaviours	Reports and public information Minutes of the meetings Statistics on disciplinary liability	Low level of participation and involvement of the representatives of legal and related professions	MoJ and SCM in cooperation with the representative institutions of legal and related professions	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 1.3.4	Drafting, approving and implementing a unitary action plan for promoting the integrity at the level of the public institutions involved in the good functioning of the justice as a public service	No. of meetings and consultations No. of identified risks No. of preventive measures adopted Conclusions and recommendations issued	Sectorial plan adopted Progress reports	Delays in adopting the action plan	MoJ and the subordinated units	Limited to the approved budget	1st semester 2012 After adoption, permanent measure assessed semestrially
Specific							

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
objectiv 1.4	Increasing the transparency of financing the political parties and electoral campaigns						
Measure 1.4.1	<p>Supplementing the legislative framework on financing political parties and electoral campaigns according to GRECO's recommendations², with a view to, among others:</p> <ul style="list-style-type: none"> -require political parties to present their consolidated accounts to the PEA and to make an adequate summary available to the public, -require that all donations be, as a rule, recorded and included in the accounts of political parties and campaign participants; ii) to introduce a requirement that all donations above a certain threshold be made through the banking system, -require that the annual accounts of political parties are subject to independent auditing prior to their submission, -give the PEA the full responsibility of monitoring compliance with the Law no. 334/2006 on the financing of activities of the political parties and election campaigns, republished, subsequently supplemented, and Accounting Law no. 	The rate of implementation of GRECO's recommendations	<p>Adopted normative acts</p> <p>GRECO's compliance report</p>	<p>Delays in the Parliament's/Government's adoption of the amendments to primary and secondary legislation</p> <p>Late budgetary allocation</p>	<p>PEA</p> <p>Government/Parliament</p> <p>NIA</p> <p>CA</p> <p>NAFA</p>	<p>Supplementing PEA's budget with 44,5 thousands lei for the title "Other transfers" for implementing the project "Support to the PEA and local public administration in Romania to implement best practices in electoral processes management"</p>	<p>30 June 2012 for amending the legal framework</p> <p>1st semester 2012 for supplementing the budget</p>

² The recommendations have been formulated in the evaluation reports of Romania, within the third GRECO evaluation round, on the incrimination of corruption deeds and the transparency of party funding and electoral campaigns. The two reports have been adopted within the 49th plenary GRECO reunion, which took place between 9 November and 3 December 2010.

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	82/1991, republished, subsequently supplemented, -ensure that all infringements of Law no. 334/2006 republished, subsequently supplemented, are punishable by effective, proportionate and dissuasive sanctions, -extend the statute of limitation applicable to violations of Law no. 334/2006 republished, subsequently supplemented.						
Measure 1.4.2	Increasing the administrative control capacity of the PEA by ensuring the necessary resources	Financial and human resources No. of notifications No. and types of sanctions applied Rate of confirmation/rejections by the court	Public reports and information	Lack of appropriate financial resources	Government through MPF	Supplementing the organisational chart of the Control of Political Parties Funding Department with 11 positions Supplementing the PEA budget with 345.358 LEI for the title "Personnel expenses"	1 st semester 2012
Measure 1.4.3	The periodical organizing by PEA of training sessions for the representatives of the political parties	No. of events No. of participants Conclusions and recommendations issued	Reports and public information Minutes of the meetings	Lack of appropriate financial resources	PEA	Supplementing the organisational chart of the Control of Political Parties Funding Department with 11 positions	At each election and semestrial

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
						Supplementing the PEA budget with 345.358 LEI for the title "Personnel expenses"	
Measure 1.4.4	Ensuring the publicity of the sources of funding of political parties and the electoral campaigns	No. of notifications No. of sanctions	Reports publicly available	Lack of appropriate budget allocation	PEA	Supplementing the organisational chart of the Control of Political Parties Funding Department with 11 positions Supplementing the PEA budget with 345.358 LEI for the title "Personnel expenses"	Annually
Measure 1.4.5	Establishing and implementing maximal norms for electoral street display	Clear criteria on the display No. of notifications No. of sanctions	Normative acts adopted Reports publicly available Reports provided by the parties to the PEA Control acts of PEA Contracts provided by the parties to the PEA	Delays in the Parliament's/Government's adoption of the amendments to primary and secondary legislation Lack of appropriate budget allocation	PEA Government/Parliament	Supplementing the organisational chart of the Control of Political Parties Funding Department with 11 positions Supplementing the PEA budget with 345.358 LEI for the title	September 2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
			No. of authorisations for the display			“Personnel expenses”	
Measure 1.4.6	Enforcing dissuasive sanctions for offering gifts/ material advantages in exchange of votes	No. of notifications No. of sanctions Type of sanctions Professional training sessions for discovering, investigating and solving electoral bribery cases	Reports publicly available Criminal complaints Indictments Courts decisions of conviction	Difficulties in discovering, investigating and solving electoral bribery	PEA/PM/HCCJ	Limited to the approved budget	During electoral campaigns
Specific objectiv 1.5	Strengthening the integrity of the members of Parliament						
Measure 1.5.1	Amending the legal framework to put on the agenda of the first plenary session the requests for lifting immunity of Parliamentarians and solve these requests in 72 hours maximum	Length of procedures to solve the requests for lifting the immunities	Normative acts adopted by the chambers of the Parliament Decisions of the Parliament The EC report on CVM	Delays in the legislative amendments	The Parliament of Romania	Limited to the approved budget	1 st semester 2012
Measure 1.5.2	Regulating the interdiction for MP lawyers to offer consultancy or to represent in any kind public authorities or state owed economic/financial entities	Amendments proposed and adopted by the parliament	Normative act adopted by the Parliament Act normativ adoptat de Parlament EC CVM report	Delays in the legislative amendments	The Parliament of Romania	Limited to the approved budget	1 st semester 2012
Measure	Preparing the evaluation of	Filled in evaluation	GRECO’s	Non-adoption of	The Parliament of	Limited to the	2012 – 2014

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
1.5.3	Romania within the IV GRECO evaluation round – “Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors”	questionnaires Greco evaluation report adopted	evaluation and conformity report	the measures under evaluation	Romania Romanian Government through MoJ (national coordinator on GRECO)	approved budget	
Measure 1.5.4	Adopting the ethical code of the members of Parliament	No. of ethics violations No. and type of sanctions applied	Analysis of European and international best practices Code adopted GRECO’s evaluation and conformity report	Adoption of the code with delay	The Parliament of Romania	Limited to the approved budget	2012
Measure 1.5.5	Organizing periodical seminars, consultations and public debates for disseminating the best practices on integrity among members of Parliament and increasing the citizens’ confidence	No. of public events No. of participant from civil society No. of identified best practices	Public information, press conference Minutes of the meetings	Low level of participation and involvement of MPs	The Parliament of Romania	Limited to the approved budget International programs developed by the anticorruption networks of the Parliaments (i.e. GOPAC)	Permanent measure with semestrial assessment
Specific objectiv 1.6	Increasing the efficiency of preventing corruption mechanisms in the field of public procurement						
Measure 1.6.1	Preventing conflicts of interest in managing public funds through: 1. Continuing to develop the measure to prevent conflicts of interest, drafted and adopted by	No. of notifications from NIA and/or from other institutions No. and type of sanctions applied (fines and warnings) No. of cases in court for	The procurement file Award documentation submitted for publication in PPES	Practical difficulties in implementing a joint solution for exchanging information	NARMPP, NIA, NTRO, DPRDM, Competition Council	Supplementing the personnel with ex-ante control attributions of NARMPP,	December 2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	<p>NARMPP, targeting:</p> <ul style="list-style-type: none"> -combating the interference and manifestation, within the public procurement procedures, of joint interests of people who have decision-making positions within the contracting authority and tenderers/ candidates/ bidders associates/ subcontractors, participating in the proceedings in question. -ascertaining the absolute nullity of public procurement contracts, public works concession contracts and services concession contracts concluded in breach of rules to avoid conflict of interest. <p>2. Continuing to implement the Protocol concluded between NARMPP and NIA with the aim of monitoring and sanctioning the conflicts of interests notified.</p> <p>3. Inclusion, as a mandatory provision in the model contracts for public procurement, public works concession and services concession of a clause according to art. 70 of Government Emergency Ordinance no. 34/2006, on the award of public procurement contracts, public works concessions contracts and services concessions contracts, approved with amendments and completions by Law no.</p>	<p>ascertaining the absolute nullity of of public procurement contracts, public works concession contracts and services concession contracts for conflicts of interest</p> <p>No. of tender documentation rejected from publication by NARMPP for failure to request/ to fill in the declaration of inconsistency with art. 69¹ of GEO no. 34/2006 approved with amendments and completions by Law no. 337/2006, as amended and supplemented, regarding the conflict of interest, as well as for failure to fill in the list of persons with decision-making powers within the contracting authority</p>		between the institutions involved		within the legal service and awarding additional funding is necessary	

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	337/2006, as amended and supplemented. 4. Managing conflicts of interest among NARMPP staff (regulated by Government Eemergency Ordinance no. 34/2006, approved with amendments and completions by Law no. 337/2006; NARMPP Order no. 107/2009 for approving the Rules for monitoring the award of public procurement contracts, public public works concession contracts and services concession, as amended and supplemented and the Government Decision no. 801/2011 on amending and supplementing Government Decision no. 525/2007 on the organisation and functioning of NARMPP).						
Measure 1.6.2	Extending the verification and control attributions of NARMPP Supplementing NARMPP personnel with control and verification attributions (60 positions)	Financial and human resources The validation rate of the tender documentation subject to NARMPP ex-ante control	Validation rate of tender documentation submitted to NARMPP ex-ante control	The insufficient uptake of law in public procurement area by the contracting authorities Practical risks related to the difficulty in efficiently exchanging information between the institutions involved	NARMPP	Supplementing the personnel with ex-ante and ex-post control attributions of NARMPP (60 positions) and awarding additional funding is necessary	2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
Measure 1.6.3	Substantial reducing of the number of irregularities and contestations, fluidization of the European Funds absorption ratio and efficient using of public funds through: <ul style="list-style-type: none"> - coordinating the development of standard procurement documentation for transport, energy and environment; - NARMPP ex-ante assessment activity, before submission for publication of the invitation /notice of participation, of the compliance with applicable law on public procurement of the tender documentation related to public procurement contracts covered by the provisions Government Emergency Ordinance no. 34/2006, approved with amendments by Law no. 337/2006 as amended and supplemented, this assessment not envisaging the technical aspects of the specification; - standardization of qualification requirements by an order of NARMPP President. 	No. and type of sanctions applied (warnings and fines) No. of documentations accepted for publication by NARMPP within the ex-ante control activity Supervision and control ex-post actions No. of notifications No. of appeals	No. and type of sanctions applied (warnings and fines) No. of documentations accepted for publication by NARMPP within the ex-ante control activity Supervision and control ex-post actions No. of notifications No. of appeals	The insufficient uptake of law in public procurement area by the contracting authorities Delays in drafting standardized documentation by JASPERS partners	NARMPP, JASPERS	Limited to the approved budget	1 st semester 2012
Measure 1.6.4	Identifying the weak points of SEAP and addressing them in cooperation with MCIS, with a view to: <ul style="list-style-type: none"> - optimize the monitoring of procurement data, to verify compliance with advertising rules in the field and substantially reduce the number 	Technical functionalities developed within the PPES The celerity of the verification procedure (the workflow in the ex-ante control activity) Monitoring the information available in PPES	Technical functionalities developed within the PPES The celerity of the verification procedure (the workflow in the ex-	Delays in the in the process of optimizing PPES	MCIS NARMPP	Financial resources for optimizing and developing new facilities in PPES	June 2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	of procedures that are affected because of the breach of these rules; - optimize NARMPP ex-ante assessment and ex-post control on the procurement procedures, due to more effective monitoring of SEAP achieved by developing this system.	Statistics generated based on reporting from PPES No. of notifications	ante control activity) Monitoring the information available in PPES Statistics generated based on reporting from PPES No. of notifications				
Measure 1.6.5	Systematization of legislation, procedures and guidance materials in public procurement and the broad dissemination to public institutions and companies	No. of appeals submitted to NCSC No. of court decisions modifying/annulling NCSC decisions	NCSC decisions Courts decisions	Difficulties related to the exchange of information between the institutions involved	NARMPP, NCSC, MoJ	Supplementing the NARMPP personnel with attributions in monitoring NCSC decisions and within the legal service is necessary	December 2012
Measure 1.6.6	Establishing a database of companies that have executed inappropriately contracts with public funds	No. of negative ascertaining documents	Ascertaining documents sent to NARMPP	Difficulties in differentiating the cases where the contract was improperly executed from cases where it is due to a conflict of interest (eg. fostering an economic operator who is unable to perform the contract in the requirements)	NARMPP	Limited to the approved budget	December 2012
Measure 1.6.7	Organizing regular multidisciplinary training courses to promote national and	No. of joint professional training activities	Training sessions agenda	Low level of participation and involvement of	POHCCJ HCCJ NAD	Limited to the budget approved for	Semestrial

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	international best practices in public procurement	Annual no. of trainees attending the courses No. and type of best practices identified and disseminated The ratio of taking best practices Introduction in the training programs of a special focus on issues such as identifying damages arising from purchase of goods at a higher price than the market price or lower quality products that required, or of goods whose acquisition was not necessary	Minute Reports presented Guidelines developed to facilitate the delimitation of administrative violations in the public procurement area from the criminal ones	representatives of institutions involved	NARMPP NIA UCVPP NCSC MOJ SCM - NIM	the institutions involved	
Measure 1.6.8	Performing an analysis of judicial practice in public procurement and tax evasion, for the unification practice, including by promoting the appeals in the interest of the law	No. of contradictory final court decisions annulled No. of appeals in the interest of the law promoted	Appeals in the interest of the law promoted	-	POHCCJ, MoJ	Limited to the budget approved for the institutions involved	Permanent measure with semestrial assessment
Specific objective 1.7	Promoting a competitive, fair and integer business environment						
Measure 1.7.1	Implementing OEDC, EU, UN standards in preventing corruption in the private sector through: - Continuing the steps to obtaining the statute of full membership within the OECD Working Group on Combating Bribery of Foreign Public Officials in International Business Transactions and subsequently to adhere to the	The level of implementing the business ethics standards and principles of the OCDE, EU and UN Recommenations of OECD Working Group on Combating Bribery of Foreign Public Officials in International Business Transactions Projects/activities of promoting	OECD, EU and UN independent reports Judiciary statistic on business environment Decisions of OECD Working Group on Combating Bribery of Foreign Public Officials in	Reservations of the OECD Member States on the Working Group membership expansion	MoJ and MECBE in cooperation with the business environment representants	Limited to the budget approved for the institutions involved Annual contribution to OECD (after becoming a member of the Working	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	<p>OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions</p> <ul style="list-style-type: none"> - 2 annual reunions with the business environment on corruption in the private sector - Disseminating in the business community the international standards on preventing corruption in the private sector - Annually assessing the level of application of the national legislation on corruption in the private sector. 	<p>the integrity in business</p> <p>Legislative and institutional measures for promoting integrity in business</p> <p>Rate of criminality in private sector</p>	<p>International Business Transactions</p> <p>Reports and studies on corruption in the private sector</p>			Group)	
Measure 1.7.2	<p>Promoting loyal competition and antitrust policies by identifying, discouraging and sanctioning anti-competition agreements:</p> <ul style="list-style-type: none"> - Handling cartel cases within the investigations opened by order of the President of the Competition Council; - Organizing conferences/ workshops/ meetings with business environment and other state authorities, to disseminate the rules of competition; - Legislative amendments aiming at enhancing the investigative capacity of the Competition Council, such as: <ul style="list-style-type: none"> • introducing the possibility for the judge of rights and liberties (art. 53, 138 and the following of Law no. 	<p>No. of investigations opened by the Order of the Competition Council President, having as object cartel cases</p> <p>No. of conferences/ round tables/ meetings organized</p> <p>No. of investigations finalized by Decisions of the Plenum of the Competition Council having as object cartel cases</p> <p>No. of complaints/ notifications/ petitions on cartel cases</p> <p>No. of cases solved under the Law on combating unfair competition no. 11/1991 with the subsequent amendments and completions</p>	<p>Orders of the Competition Council President (for initiating investigations)</p> <p>Brochures/ magazines drafted by the Competition Council</p> <p>Decisions of the Plenum of the Competition Council</p> <p>Annual report of the Competition Council</p> <p>Semestrial reporting (on request) to the Platform for the cooperation of independent and</p>	<p>Non-adoption of the legislative proposals of the Competition Council</p> <p>Inefficient specialized personnel</p>	Competition Council	Human resources: filling in 10 competition inspectors positions	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	<p>135/2010 on the Criminal procedure code) to order, on request or ex officio, the transmission of information obtained by means of electronic interception or other special techniques to the Competition Council, by the act of authorisation itself, when there is evidence of the offense provided for in art. 60 of the Competition Law no. 21/1996 republished, with subsequent amendments and supplements, in order to use them as evidence in the investigations of the Competition Council;</p> <ul style="list-style-type: none"> • establishing the measure of removing criminal liability for the physical persons who have committed the offense referred to in art. 60 of the Competition Law no. 21/1996, republished, with subsequent amendments and supplements, but who actively participate in the discovery and investigation of anticompetitive acts they were involved in and covered by the leniency policy, implemented by the Competition Council, pursuant to art. Article 51 para. 3 of the same Law; • modernizing the Law on combating unfair 	<p>Leges ferenda proposals forwarded by the Competition Council to the institutions with legislative initiative</p>	<p>anticorruption authorities</p>				

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	competition no. 11/1991, with the subsequent amendments and completions						
Measure 1.7.3	Achieving the exchange of best practices in implementing the conformity programmes between the private sector and the public sector	Best practices identified No. of joint training activities The level of implementation of best practices	Public reports and briefings Minutes of meetings	Low level of participation and involvement of representatives of public sector and business environment	MoJ through the platform for the cooperation with the business environment In partnership with the Foreign Investors Council	Limited to the budget approved for the institutions involved	Permanent measure with semestrial assessment
Measure 1.7.4	Organizing regular public consultations between the representatives of the public sector and of the business environment on the national anticorruption agenda and on the public policies having impact on the economic activities	No. of meetings/cooperation actions No. of projects of public policy or discussed normative acts No. and type of notifications No. and type of identified solutions	Reports and public information Public policies or normative acts adopted Minutes of the meetings	Low level of participation and involvement of representatives of the business environment Late consultation of the business environment	MoJ and MECBE through the platform for the cooperation with the business environment In partnership with the Foreign Investors Council	Limited to the budget approved for the institutions involved	Permanent measure with semestrial assessment
Measure 1.7.5	Disseminating the antibribery policies and programs developed at the level of the companies, including making them available to the possible contractors and suppliers and requesting them to comply to equivalent standards	No. and type of antibribery measures Level of implementation of antibribery measures in the business environment No. and type of campaigns promoting integrity in business	Anticorruption policies and programs developed Standards developed and undertaken by the business environment	Low level of participation and involvement of representatives of the business environment	MoJ through the platform for the cooperation with the business environment In partnership with the Foreign Investors Council	Limited to the budget approved for the institutions involved	Permanent measure with semestrial assessment
Specific objectiv 1.8	Strengthening the integrity, efficiency and transparency at the level of public local administration						
Measure 1.8.1	Simplifying the administrative procedures for issuing	No. of simplified procedures	Adopted normative acts	Delays in adopting	Local public administrations	Limited to the approved	Permanent measure with

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	certificates and authorizations	Length of the procedure The reduced costs No. of certificates and authorizations issued quarterly	Methodological regulations and approved procedures	normative acts, methodological norms and procedures	authorities The prefect	budget	semestrial assessment
Measure 1.8.2	Setting up cost standards and best practices on the main working procedures specific to the local public administration	Cost standards identified Best practices identified	Normative acts establishing cost standards	Delays in adopting normative acts establishing cost standards	MoJ and MAI through the Platform for the cooperation with local public administration, in cooperation with the associative structures of local public administration in Romania	Limited to the approved budget	2013
Measure 1.8.3	Adjusting organisational structures in relation to the standards of cost and population served	No. and type of organisational measures adopted	Normative acts adopted	Delays in adopting the normative acts	MoJ and MAI through the Platform for the cooperation with local public administration, in cooperation with the associative structures of local public administration in Romania	Limited to the budget approved for the institutions involved	2013

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
Measure 1.8.4	Organizing periodical consultations/ public debates at local level for promoting the best anticorruption practices within the local public administration and increasing the citizens' confidence	No. of public events No. of public institutions and of the civil society organizations represented No. and type of conclusions No. and type of notifications, irregularities sent with the occasion of the events and adopted measures	Minutes of the meetings Questionnaires for evaluation Participation reports Evaluations after participation	Low level of participation and involvement of representatives of the local public administration	Mayors, presidents of county councils, prefects, the associated structures of local public administration in Romania, PM, MAI, MoJ	Limits to the budget approved for the involved institutions	Permanent measure with semestrial assessment
Measure 1.8.5	Elaborating and disseminating a diagnostic study on the corruption phenomenon within the local public administration ³	No. and types of institutions included in the study No. and types of risks and institutional vulnerabilities identified No. and types of recommendations The assessment of civil society involvement in monitoring the budgetary exercise	Jurisprudence The published and disseminated charter	Blocking the activity of the company contracted for the sociological research The wrongful sampling of the target group	MAI through CUPAR in coloboration with GAD, local public administration authorities, PM, MAI, MoJ	2.076.906,60 LEI without VAT (1.765.370,61 LEI eligible grant amount European Social Fund and 311.535,99 LEI eligible cofinancing from MAI)	1 st semester 2012
Measure 1.8.6	Developing the networks for the elaboration and assessment of public policies at territorial/ local level, after the model of Anticorruption Action Groups ⁴	No. of meetings No. of participants No. and level of involvement of civil society representatives in the groups' activity	Public reports Press conferince	Low level of participation and involvement of representatives of the local public administration	Mayors, presidents of county councils, prefects, associated structures of local public	Limited to the budget approved for the institutions involved Internationally	Permanent measure with semestrial assessment

³ Objectives which are included within the Diagnostic study on the corruption phenomenon within the public local administrations , co-financed by the European Social Fund through the Operational Programme Strengthening the Administrative capacity – priority Axis 1, major field of intervention 1.2 – Increasing the liability of the public administration. The project is implemented by MAI, through CUPAR.

⁴ Within the National Anticorruption Strategy 2008 – 2010 , through the cooperation between MAI and the National Centre for Integrity, the Anticorruption Action Groups have been set up, including representatives of the local public administration authorities and of the decentralized services.

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		No. of elaborated/evaluated anticorruption policies No. of recommendations/level of implementation			administration in Romania, PM, MAI, MoJ, civil society	financed programs	
OBIECTIV GENERAL 2 - INCREASING THE LEVEL OF ANTICORRUPTION EDUCATION							
Specific objectiv 2.1	Developing the anticorruption component of the continuous training curricula for the personnel of the public institutions						
Measure 2.1.1	Ensuring the participation of the employees at periodical training courses on the ethical and behaviour norms	No. of employees which have participated to the training courses No. and type of subjects included in the training program	Evaluation questionnaires on the training courses Participation reports Evaluations after participation	The training curricula not adapted to the participants' profile Superficial involvement in the training sessions	The management of the institution	Limited to the budget approved for the institutions involved Internationally financed programs	Annually
Measure 2.1.2	Introducing within the professional training topics modules on integrity	No. and type of subjects included in the curricula No. of practical exercises included in the curricula	Inventory of existing training programs Selection of relevant topics Standard programs developed	Insufficient number of trainers	MAI – NACS in cooperation with NAS technical secretariat and the institutions with attributions in preventing and combating corruption	Limited to the budget approved for the institutions involved Internationally financed programs	1 st quarter 2012
Measure 2.1.3	Elaborating and disseminating informative guides and materials on the risks and consequences of the corruption deeds or of the integrity incidents	No. and type of elaborated/disseminated informative materials	Guides, manual published	Insufficient financial resources	MAI – NACS in cooperation with NAS technical secretariat and the institutions with attributions in preventing and combating	Limited to the budget approved for the institutions involved Internationally financed	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
					corruption	programs	
Specific objectiv 2.2	Increasing the degree of public awareness on the impact of the corruption phenomenon						
Measure 2.2.1	Organizing anticorruption public debates at national and local level	No. of public debates No. of participants No. of recommendations and conclusions	The event's agenda Reports presented Minutes Participation reports Post participation assessments	Low level of participation and involvement of the public institutions representatives Non-representiveness of the participants in the debates organized	MERYYS, school inspectorates, universities, in cooperation with NAS technical secretariat and the institutions with attributions in preventing and combating corruption	Financing for national debates through European Social Fund project ⁵ "Preventing corruption in education through information, training and responsibility"	1 st semester 2012 and semestrial
Measure 2.2.2	Introducing the anticorruption theme within the extracurricular activities and the school programs (promoting an optional course within the CDS - Curricula upon the school's decision – out of "Human Being and Society" and "Counselling and Orientation")	No. of projects/programs Evolution of the perceptions on corruption	Extracurricular activities thematic changed Optional course taken Normative act for approving the optional course curricula adopted Surveys	Insufficient number or trainers Reducing the number of school hours/week	MERYYS, (school inspectorates, universities)	Limited to the budget approved for the institutions involved Internationally financed programs	Annually
Measure 2.2.3	Carrying out a national and local campaign to promote a recognition and rejection of corruption behaviour, including through partnerships school - community - family	No. and type of activities/campaigns carried out Level of involvement of the three segments	Informative materials Surveys Post participation	Low level of participation and involvement of the representatives of the three	MERYYS, school inspectorates, universities, in cooperation with NAS technical	Cofinancing through the European Social Fund project "Preventing	Permanent measure with semestrial assessment

⁵ The project European Social Fund „Preventing corruption in education through information, training and responsibility” has a budget of 14.101.005,77 lei without VAT (aut of which an eligible amount of 11.985.854,90 lei and cofinancing of 2.115.150,87 lei).

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		No. of partnerships Evolution of corruption perception	assessment Reports	segments	secretariat and the institutions with attributions in preventing and combating corruption	corruption in education through information, training and responsibility” and other externally financed projects	
Measure 2.2.4	Initiating and carrying out common projects with NGOs specialized in the anticorruption field	No. and type of activities/project/programs organized in partnership No. of protocols	Partnership protocols concluded Periodical monitoring and assessment reports of the project	Insufficient financial resources	MERYS (school inspectorates, universities) and NGOs in cooperation with NAS technical secretariat and the institutions with attributions in preventing and combating corruption	Externally financed projects	Permanent measure with semestrial assessment
Measure 2.2.5	Drafting methodological guides on prevention of corruption in education	No. of published guides	Periodical monitoring and assessment reports of the project “Preventing corruption in education through information, training and responsibility” (PCE project)	Insufficient expertise	MERYS and partners	Financing through the European Social Fund project “Preventing corruption in education through information, training and responsibility” (PCE project)	2013
Measure 2.2.6	Setting up a portal and a database for online notifications and institutional mechanisms for verification	Operational portal Operational data base	Periodical monitoring and assessment reports of PCE project	Sustainability of the portal and data base after finalizing the	MERYS and partners	Financing through the PCE project	2013

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
				PCE project			
Measure 2.2.7	Training teachers and public administration personnel on anticorruption in education	No. of persons trained (directors and members of the Boards of Director, civil servants, contractual personnel)	Periodical monitoring and assessment reports of PCE project	Lack of continuity in disseminating the information	MERYs and partners	Financing through the PCE project	2013
OBJECTIV GENERAL 3 - COMBATING CORRUPTION THROUGH ADMINISTRATIVE AND CRIMINAL MEASURES							
Specific objectiv 3.1	Continue the already made progress in the process of impartially investigation and the indictments of the courts of high and local corruption (BM 3 and 4)						
Measure 3.1.1	Ensuring the stability and predictability of the material and procedural criminal anticorruption legal framework	No. of anticorruption normative drafts elaborated by the MoJ in consultation with the NAD and the POHCCJ No. of proposals made by the NAD and the POHCCJ undertaken in the final form of the normative act Nr. of endorsements issued by the MoJ for legislative drafts elaborated by other initiators	Adopted anticorruption normative acts Press articles Independent evaluations	Adopting such legislative amendments without consulting NAD and POHCCJ	MoJ and the Parliament	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 3.1.2	Carrying on the professional and impartial investigations in cases of NAD jurisdiction	The complexity and the relevance, from the point of view of NAD's competence established by the law, of the solved cases Statistical data on the quality of criminal pursuit acts; statistical data on the reasonable length of the criminal pursuit The evolution of the number of files per prosecutor and per section/territorial service	Annual report Annual conference Press releases, press articles Independent evaluations	-	NAD	Limited to the approved budget	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		<p>Statistical data on interim measures taken for asset recovery and for confiscating the proceeds of crime</p> <p>No. of statistical indicators on the judgements rendered by courts in NAD's cases during the previous year</p> <p>No. of confirmation of documents in court</p> <p>No. of dismissed documents in court</p>					
Measure 3.1.3	Adopting managerial measures allowing for the trial within a reasonable timeframe of high-level corruption cases in all competent courts	<p>Facilities necessary to carry out HCCJ's activity</p> <p>Semestrial studies on the individualisation of corruption cases</p> <p>Recommendations on the individualisation of corruption offences penalties</p> <p>The length of the NAD's cases pending before the courts</p> <p>No. of criminal trials which have ceased due to the extinctive prescription of the criminal liability</p>	Final judgments in DNA's cases	Insufficient resources granted	HCCJ and other competent courts	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 3.1.4	Continue to implement strategies to combat local corruption developed by POHCCJ	<p>No. of indictments</p> <p>No. of ex-officio notifications</p> <p>The quality of the investigated persons</p>	Annual report	-	POHCC local prosecutors offices	Limited to the approved budget	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		Courts solutions					
Measure 3.1.5	Transmission by the courts in electronic format the final court decision rendered in the files under NAD jurisdiction and post them on NAD site, respecting the legal framework for the protection of personal data	No. of the courts final decisions of conviction in the NAD's cases	NAD's site Annual report	Courts non-sending of the decisions in electronic form	NAD, Courts of Appeal, HCCJ	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 3.1.6	Making analysis on the corruption phenomenon by using the annual statistical data of NAD, POHCCJ, GAD and FID	No. of identified risks and vulnerabilities No. and type of recommendations Level of implementations of the recommendations	Annual report	Statistical data uncorrelated	NAD, POHCCJ, GAD and DIF in cooperation with the NAS's technical secretariat	Limited to the approved budget	1 st semester - annually
Measure 3.1.7	Strengthening transparency, inter-institutional and international cooperation	No. of public debates with the participation of the civil society and media No. of press conferences No. and type of published/disseminated information No. of international meetings No. of interventions of the anticorruption institutions representatives	Reports and public information Publications and distributed materials	Non-granting human and financial resources necessary to the effective involvement in international programs	NAD, POHCC, GAD	Limited to the approved budget	Permanent measure with semestrial assessment
Specific objective 3.2.	Improving the quality and quantity of the monitoring activity and evaluation of assets and interests, in order to achieve dissuasive effects, which will permit reducing the number of cases of acquiring unjustified assets, conflicts of interest or incompatibilities (BM 2)						
Measure 3.2.1	Monitoring (follow-up) the NIA cases forwarded to the competent	Reporting matrix „end-to-end” implemented for 100 %	Statistics periodically elaborated	-	NAI Competent	NAI's budget	Permanently

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	institutions/authorities (prosecutors' offices, courts, the assets investigation commission from the courts of appeal, the disciplinary committees)	Active coordination and cooperation between NAI and institutions/authorities	Reporting matrix of the integrated management information System of assets and interests declarations		institutions/authorities (prosecutors offices, courts, the assets investigation commission from the Courts of Appeal, disciplinary committee)		
Measure 3.2.2	Strengthening and improving the legal framework regarding the sanctions in insuring the integrity in the exercise of public functions	Legislative amendments on the administrative sanctions amedaments for increasing there dissuasive character	Legislative proposal Provision of law	The refusal of the competent institutions involved in taking such a measure	The Parliament, The Government (MJ)	-	First semester of 2012
Measure 3.2.3	Developing orientation guides on prosecuting procedures of cases of confiscation of assets, for the judges and prosecutors from the assets investigations commissions attached to the courts of appeal	Guidelines and procedures developed and disseminated to judges and prosecutors Pro-active institutional cooperation	Guidelines and procedures Activity reports Public information	-	NAI, SCM, Courts and prosecutors' offices	-	First semester of 2012
Measure 3.2.4	Development, strengthening and implementating the activities included in the cooperation protocols (with optimal operational value) with institutions and public authorities, periodic monitoring of their fulfillment	The collaboration protocols with optimal operational values concluded with other institutions involved in the process of enshuring the integrity of the public space Objectives due to the accomplished collaboration protocols	Activity reports Signet documents Press releases	The impossibility of achieving all the objectives and measures from the collaboration protocols	NAI Institutional partners	NAI's budget Budget from the institutional partners	Permanently
Measure 3.2.5	Evidence of a history of prompt and dissuasive sanctions from administrative and judicial authorities regarding incompatibilities, conflicts of interest and confiscation of	Dissuasive sanctions applied in the legal term by the disciplinary committees in case of incompatibilities of conflict of interests	Reporting matrix „end-to-end” CVM reports – BM 2	Delay of cases in courts Delay of cases in the disciplinary committees	NAI, Authorities/ administrative and judiciary institutions	-	Beginning of 2012 Permanently

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	assets whose origin can not be justified as a result of findings of NIA	Unjustified assets confiscated	Activity reports				
Measure 3.2.6	Reducing the period in which a case is solved by using IT solutions	Hardware designed to simplify procedure for filling in, archiving and automatic analysis of documents purchased, delivered and installed Improved process for filling in the declarations of assets and interests Improved working procedures Improved evaluation process	Agency's activities reports CVM reports– BM2 The external audit report for ANI's management	Large period of time for the approval of the projects financed through structural funds	NAI IT Service Provider	Approved budget through European Social Fund (PO DCA) – The project „efficient public services by simplifying the procedure of filling in, archiving and analyzing the documents within NAI and facilitating electronic access to public information”	1 st quarter of 2012 and semestrial
Specific obiectiv 3.3	Ensure effective protection of EU financial interests in Romania, by specific legislative, operational and informational means (BM 4)						
Measure 3.3.1	Increasing the transparency regarding the beneficiaries of EU funds and the actions taken by institutions with operational attributions in protecting the EU's financial interests in Romania	Unique point of contact designated through administrative / legislative measures No. of concluded cooperation protocols Elaborated quarterly summaries	Functional website The evolution of the irregularities impact	Failure to ensure financing the design and operation of the site Poor cooperation from the institutions involved in managing EU funds	The institutions coordinated by FFD responsible for managing the EU's funds and	Limited to the approved budget Human resources: FFD personnel and of the responsible institutions	1st semester 2014
Measure 3.3.2	Protecting the EU financial interests through means specific to the legislative and judicial	Two training sessions organised	FFD annual report	Impossibility of providing finance for carrying out	FFD	Limited to the approved budget	2 nd semester 2013

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	powers and familiarizing the representatives thereof with the European initiatives in this field			the sessions and of publication of materials needed		Human resources: FFD personnel, OLAF, NAD	
Specific obiectiv 3.4	Strengthening the mechanisms for administrative control						
Measure 3.4.1	Assessing the system of administrative sanctions and their implementation	No. and type of disciplinary infringements No. and type of sanctions applied	Survey published	-	NAS tehcnical secretariatul	Limited to the approved budget	2013
Measure 3.4.2	Carrying out an analysis at national level on the performance of the evaluation system in central and local public administration	No. and type of standards professionally assessed No. and type of criteria taken into account No. of appeals related to the professional evaluation	Survey published	-	NAS tehcnical secretariatul	Limited to the approved budget	2013
Measure 3.4.3	Strengthening the operational autonomy of the internal control and audit structures and raising the awareness among the decision-making factors from the level of the involved institutions on the role of the internal control / managerial systems	No. of employees related to the workload Material resources granted No. of recommendations issued/ implemented	Annual activity reports	Insufficient human and financial resources	The management of the public institution Head of the minister's control department Head of the internal audit structure	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 3.4.4	Intensifying cooperation with using the results of auditing and internal control activities	No. of notifications sent to judicial bodies No. of notifications confirmed by indictments and final convictions	Annual activity reports Cooperation protocols Judicial statistics	-	The management of the public institution Head of the minister's control department	Limited to the approved budget	Permanent measure with semestrial assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		No. of joint training activities			Head of the internal audit structure CA, PM, SCM-NIM		
Measure 3.4.5	Introduction in public institutions, on an experimental basis, the integrity tests as an exclusively administrative measure to assess the compliance with the ethical standards	No. of institutions introducing the integrity test Professional training sessions No. of tests applied No. and type of sanction applied	Normative acts introducing the integrity tests Methodology for testing the integrity adopted Informing the employees on the new measure testing the integrity	-	Integrity/prevention structures form public institutions in cooperation with GAD	Limited to the budget approved for the institutions involved	2 nd semester 2012 With assessment report in 1 st semester 2013
Measure 3.4.6	Applying dissuasive disciplinary sanctions for violation of ethical and anticorruption conduct standards at the level of all public functions and dignities	No. of notifications received No. of pending notifications No. of notifications solved No. and type of sanctions No. of decisions of the commission annulled or amended by court No. of persons who have repeatedly committed violations of the rules	The disciplinary commission operational Commission's decisions	Formal nature of the activity of the disciplinary committees Developing a practice of the committees to apply the lightest sanctions	The management of the public institution	Limited to the approved budget	Permanent measure with semestrial assessment
Measure 3.4.7	Publishing a periodical report on disciplinary sanctions	No. of reports published No. of institutions that are sending contributions	Report published on site Self-assessment provided under 1.1.1	-	NAS technical secretariat	Limited to the approved budget	Annually

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
Measure 3.4.8	Introducing under the competence of the control bodies the obligation to respond more elaborately to questions raised by citizens and provide appropriate guidance to overcome the stereotype answers or template phrases	Internal procedures and instructions on how to formulate the answers No. of administrative complaints No. of notifications to court determined by the modality of answering Degree of return to complaints, notifications	Report published	-	NAS technical secretariat in cooperation with public institutions with control attributions	Limited to the approved budget	1 st semester 2012
Specific objectiv 3.5	Increasing the degree of the recovery of proceeds of crime following the best practices from other EU Member States and strengthening legal practice						
Measure 3.5.1	Supporting the revision process of the Constitution with a view to amend art. 44 para. (8)	Amending the text of the Romanian Constitution	Final revision draft	Rejecting by the Parliament of the proposal to amend art. 44 para. (8) of the Romanian Constitution, republished	Government of Romania	-	-
Measure 3.5.2	Adoption by Parliament of the two draft normative acts promoted by the Ministry of Justice on the extended confiscation and valorification of seized assets before a criminal decision is final	Draft normative acts adopted by the Parliament Recommendations in Moneyval, GRECO, EC reports	Official Journal of Romania EC CVM report Report on the implementation of the Council's Framework decision 2005/212/JHA from February 24, 2005 on Confiscation of Crime-Related Proceeds, Instrumentalities and Property	Rejecting by the Parliament of the two normative acts	MoJ – presenting the draft in the Parliament	-	1 st semester 2012

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
Measure 3.5.3	<p>Starting a greater number of investigations in cases of money laundering as a stand-alone crime</p> <p>The following shall be taken into account:</p> <ul style="list-style-type: none"> Establish as a priority objective for the criminal investigation bodies of initiating the prosecution of money laundering investigations, without proving the predicate offence, Promoting the existing best practices in the money laundering area, Organizing periodical technical reunions. 	<p>No. of indictments</p> <p>No. of conviction court decisions</p> <p>No. of acquittals and the motivation</p> <p>No. of training sessions for police officers, judges and prosecutors</p> <p>Practice compendiums published on PM, MoJ, NIM websites</p> <p>No. of reports drafted</p> <p>No. of international projects</p> <p>No. of coordination reunions at strategic and technical level</p>	<p>PM annual reports</p> <p>Full statistical data in money laundering cases</p> <p>Court decisions</p>	<p>Non-uniform interpretation of the special law</p> <p>Non-uniform practice</p>	POHCCJ in cooperation with MAI - GIRP-COCD, NOPCML, MoJ, NIM	<p>Limited to the budget approved for the institutions involved</p> <p>Internationally financed projects</p>	Permanent measure with semestrial assessment
Measure 3.5.4	Strengthening cooperation in identifying the proceeds of crime with similar institutions from EU and the specialized networks CARIN and UNO through the specialized structure in the MJ designated as an Asset Recovery Office	<p>No. of requests for information received</p> <p>No. of requests for information sent</p> <p>No. of requests answered within the deadline of the requesting state</p> <p>Interconnection with EUROPOL's SIENA network</p> <p>No. of cooperation activities (assistance projects, professional training, studies etc.)</p>	<p>Annual report MoJ</p> <p>Requests for international judicial cooperation</p> <p>Normative acts adopted for enhancing inter-institutional cooperation</p> <p>Final court decisions</p>	Incomplete data contained in the cadastre registries	MoJ	<p>Limited to the budget approved for the institutions involved</p> <p>International program ongoing budget 264.532 Euro</p> <p>Proposed international projects Budget 1: 344.266 Euro Budget 2:</p>	Semestrial intermediary and annual assessment

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
						803.613,30 lei Budget 3: 14.684 euro	
Measure 3.5.5	Developing an integrated mechanism to monitor the interim measures and the confiscations ordered in cases related to serious crimes, including corruption, as well as the state of play of the valorification of assets deriving from offences	Interim measures ordered No. of cases in which special and extended confiscation were ordered The amount of confiscations ordered by courts and notified to NAFA Amount recovered to the state budget Operational system The automatic upload of the statistical data by those ordering the interim measures, confiscations, valorifications Complex features for search and perform comparative analysis of the statistical data Court decisions published online	PM official statistical data Final court decisions NAFA's official statistical data Annual MoJ report on recovery of proceeds of crime Inter-institutional cooperation protocol IT solution developed as a platform software and accessible to the four institutions Annual report MoJ published	Non-assuming the strategic objective by the public institutions Procedures Delays in inter-connecting the statistical data resources by the public institutions involved	MoJ in cooperation with PM, MAI, NAFA and SCM	Limited to the budget approved for the institutions involved	2 nd semester 2012 After making operational the measure system with intermediary semestrial and annual assessments
Measure 3.5.6	Amending the normative acts and procedures in force so that the MPF can intervene as a civil part in the criminal cases, when the passivity of the public institutions concerned affects the public budget	No. of proposals for amending normative acts	Analysis legislation in force and comparative law	Delays in promoting draft legislation	MoJ in cooperation with MPF	Limited to the budget approved for the institutions involved	2 nd semester 2012
Measure 3.5.7	Adopting legislative and institutional measures to allow a better management of seized	System analysis and european and international best practices assessment	Official Journal of Romania	Delays in promoting draft legislation	MoJ, POHCCJ, SCM, NAFA	Limited to the budget approved for	2 nd semester 2012 for finalizing the system analysis

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
	and confiscated assets, as well as the reuse of these in social or crime prevention programs	No. of proposals for amending normative acts issued/adopted Making operational a structure dealing with the management of assets recovered from crimes Assets and amounts from confiscations reused in social programs and programs to prevent crime	Official statistical data MPF			the institutions involved	2 nd semester 2013 for making operational a structure dealing with the management of assets recovered from crimes
Measure 3.5.8	Disseminating the best practice in the field of identifying, confiscating and valorification of the proceeds of corruption and other crimes	No. and type of best practices identified and disseminated No. of prosecutors, judges and police officers who have access to best practices No. and types of instruments and working methodologies identified and disseminated Semestrial drafting and disseminating within the practitioners of a newsletter comprising practical cases, jurisprudence	Reports and studies published Conclusions of the professional training sessions Newsletter MoJ	Low level of participation and involvement of the representatives of responsible institutions	MoJ in cooperation with SCM, POHCCJ	Limited to the budget approved for the institutions involved	Permanent measure with semestrial assessment
GENERAL OBJECTIV 4 – APPROVING THE SECTORIALS PLANS AND DEVELOPING THE NATIONAL SYSTEM TO MONITOR NAS							
Specific objective 4.1	Approving the sectorial plan and periodical self-assessment of the degree of implementation of the national anticorruption legislation, especially of the preventive measures						
Measure 4.1.1	Informing the employees about the process of developing the integrity sectorial plan	No. of employees informed about the elaboration of the action plan The way in which the information takes place (meeting, via email)	Minutes	Purely formal information Non-attendance by the majority of employees	The management of the institution	Limited to the approved budget	30 days after the adoption of NAS Note: for the decentralised institutions, the deadline is 45

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		No. of received/included contributions					days
Measure 4.1.2	Identifying the institution's specific risks and vulnerabilities	No. of risks and vulnerabilities inventoried	Assessment report of risks and vulnerabilities drafted	Formalized approach in the absence of risk assessment methodologies	The management of the institution The assessment team composes of managers of the main departments	Limited to the approved budget	45 days after the adoption of NAS Note: for the decentralised institutions, the deadline is 60 days
Measure 4.1.3	Identifying the measures to address the specific vulnerabilities of an institution	No. of measures	Report on the measures to remedy the vulnerabilities drafted	Formalized approach in the absence of risk assessment methodologies	The management of the institution The assessment team composes of managers of the main departments	Limited to the approved budget	60 days after the adoption of NAS Note: for the decentralised institutions, the deadline is 75 days
Measure 4.1.4	Approving and disseminating the sectorial plan and the accession declaration to NAS	No. of copies distributed	The decision to approve the sectorial plan The decision to nominate the sectorial strategy coordinator	-	The management of the institution The assessment team composes of managers of the main departments	Limited to the approved budget	90 days after the adoption of NAS Note: for the decentralised institutions, the deadline may not exceed the 1 st semester 2012
Specific objective 4.2	Monitoring the implementation of the sectorial plan and the participation in the NAS's national monitoring system						
Measure 4.2.1	Adopting the declaration of accession to the values, principles, objectives and monitoring mechanism of NAS and communication to NAS technical secretariat	Express mentionings on the adherence to the: - fundamental values - principles - objectives - monitoring mechanism. Nominated persons to	Document adopted and sent to NAS technical secretariat, together with - the sectorial plan - contact details of the sectorial plan coordinator.	-	The management of the institution	Limited to the approved budget	90 days after the adoption of NAS Note: for the decentralised institutions, the deadline may not exceed the 1 st

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
		implement the strategy and the sectorial plan					semester 2012
Measure 4.2.2	Making the NAS technical secretariat operational	10 persons with permanent activity out of which 4 from other public institutions except for MoJ No. of volunteers from civil society attending the monitoring activities	Order of the minister of justice to set up the NAS technical secretariat	Delays in delegating to MoJ the representatives of other public institutions	MoJ	Limited to the approved budget MoJ will initiate an internationally financed program for supporting the monitoring process	45 days after the adoption of NAS
Measure 4.2.3	Data collecting for establishing the necessary guideline for the self-evaluation	Dates and information collected for all the indicators included in the inventory provided under 1.1.1 (Annex no. 2 to the decision)	The first self-assessment report elaborated and sent to the technical secretariat of NAS	The absence of a mechanism for systematical collection of requested data The absence of working procedures	The coordinator of the sectorial strategy	Limited to the approved budget	3 months after the adoption of NAS for 2011 Semestrial
Measure 4.2.4	Drafting, testing and approving the methodology for carrying out the activities of monitoring and the NAS portal	No. and type of monitoring procedures IT soft developed, compatible with the sectorial adopted IT solutions	Methodology approved Portal concept approved	-	MoJ - NAS technical secretariat	Limited to the approved budget MoJ will initiate an internationally financed program for supporting the design of the portal	60 days after the adoption of NAS for the presentation before the cooperation platforms and initiating testing 15 July for the approval within the coordination reunion organized semestrially under the coordination of

THE NATIONAL ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL ANTICORRUPTION STRATEGY FOR THE PERIOD 2012-2015

Level	Description	Indicators	Sources of verification	Risks	Responsible	Resources	Term
							the minister of justice
Measure 4.2.5	Contribution to the elaboration to the National Anticorruption Report	No. of communications to the NAS technical secretariat Taking in the sectorial plan the minimal measures included in the NAS plan Full collection of indicators from the inventory of preventive measures provided under 1.1.1	National semestrial report Annual national report	Sending incomplete or late information Not-including in the job description the attributions of coordinating and monitoring the sectorial plan	The coordinator of the sectorial plan	Limited to the approved budget	July for the intermediary report February for the annual report
Measure 4.2.6	Participation to the NAS's monitoring activities	No. of persons per institution attending the cooperation platforms No. of experts per institution attending the thematic assessment missions	Lists of participants Minutes National semestrial and annual reports published	-	MoJ NAS technical Secretariat The management of the institution The coordinator of the sectorial plan	Limited to the approved budget	Cooperation platforms – every 2 months Coordination reunions – semestrial under the coordination of the minister of justice Thematic assessment missions – semestrial