

**When Does Transparency Improve Institutional Performance? Evidence from 20,000 Projects in 183 Countries\***

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## When Does Transparency Improve Institutional Performance? Evidence from 20,000 Projects in 183 Countries

**Abstract:** Access to information (ATI) policies are often praised for strengthening transparency, accountability, and trust in public institutions, yet evidence that they improve institutional performance is mixed. We argue that an important impediment to the effective operation of such policies is the failure of bureaucrats to comply with information requests that could expose poor performance. Analyzing a new dataset on the performance of approximately 20,000 aid projects financed by 12 donor agencies in 183 countries, we find that enforcement matters: the adoption of ATI policies by agencies is associated with better project outcomes when these policies include independent appeals processes for denied information requests but with no improvement when they do not. We also recover evidence that project staff adjust their behavior in anticipation of ATI appeals, and that the performance dividends of appeals processes increase when bottom-up collective action is easier and mechanisms of project oversight are weak.

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## Introduction

In 2011, a civic activist from the Turkish city of Bartın approached the World Bank’s Ankara office seeking information about the Turkish government’s response to a natural disaster some years earlier, which had been partially financed via a World Bank emergency recovery project.<sup>1</sup> Unsatisfied with the World Bank’s response, the activist filed an Access to Information (ATI) request under the 2010 World Bank Policy on Access to Information. This request was rejected by the World Bank, prompting the activist to make use of two independent appeals mechanisms provided by the policy. Both appeals were also denied: the information requested did not exist in the World Bank’s records. Yet this unsuccessful effort did not pass without notice. As one World Bank staff member involved in handling the request and appeals put it, “[W]e were all frightened—if someone requests, we have to address that.”<sup>2</sup> Responding to the claims consumed “a tremendous amount of time and energy” within the Ankara office—staff had to translate and scan a large number of project-related documents to allow their counterparts at the World Bank’s Washington D.C. headquarters to adjudicate the claim—and raised the salience of the ATI policy in day-to-day decisionmaking.<sup>3</sup> Most notably, the threat and eventual usage of the appeals process contributed to “a culture of caution and carefulness,” prompting staff to pay closer attention

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<sup>1</sup> Author interviews with a member of the World Bank’s Turkey Country Management Unit, 26 March 2019, and a former member of the World Bank’s Ankara office, 5 April 2019. For more information on this case and the interviews referenced in this article, see Online Appendix K (pp. 29-30).

<sup>2</sup> Author interview of 26 March 2019.

<sup>3</sup> Author interviews of 26 and 5 April 2019.

to internal rules and guidelines to ensure that they properly discharged their responsibilities.<sup>4</sup>

In recent decades, ATI policies have emerged as the most prominent form of institutionalized transparency in governments and international organizations. By guaranteeing the right to request information from public institutions, they create new opportunities for stakeholders to monitor bureaucratic activities and to access public-sector knowledge, transforming their relationship with such institutions. Yet while ATI policies are often praised for enhancing transparency, accountability, and trust in the public sector (e.g., Banisar 2006; Florini 2007), empirical evidence that they lead to better institutional performance is mixed. Some studies find that they increase bureaucratic efficiency (Vadlamannati and Cooray 2016a) and reduce levels of corruption (Cordis and Warren 2014; Peisakhin and Pinto 2010). Others report that they may increase corruption (Escaleras et al. 2009; Costa 2013; Vadlamannati and Cooray 2016b), reduce bureaucratic quality (Costa 2013), and fail to improve administrative decisionmaking (Worthy 2010). We seek to contribute to this high-stakes debate by investigating the conditions under which ATI policies improve the performance of public institutions.

The administrative features of ATI policies rarely draw close attention—but perhaps they should. We argue that an important impediment to the effective operation of ATI policies is the failure to properly *enforce* their provisions. Bureaucrats, whether in government agencies or international organizations, have incentives to avoid complying with legitimate information requests that could expose poor performance. Noncompliance is both difficult to

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<sup>4</sup> Author interview of 26 March 2019.

detect for actors outside public institutions and unlikely to be sanctioned by actors within them, who also stand to benefit from the option of withholding information. Reliable mechanisms for detecting, exposing, and remedying noncompliance can thus help to ensure that ATI policies curtail “agency slack” and generate information that can be used to improve project outcomes. As a World Bank official involved in the Bartın request put it, appeals processes create “a tremendous incentive to do a good job and comply with [ATI] requests.”<sup>5</sup>

We empirically evaluate our argument in the context of international development assistance. We analyze how the adoption of ATI policies by bilateral and multilateral donor agencies—such as the Japan International Cooperation Agency and the World Bank— influences the outcome of projects they finance in low- and middle-income countries. These projects are typically implemented by government entities in recipient countries; project outcomes thus depend on the actions both of domestic bureaucrats and of aid agency officials.<sup>6</sup> Our analysis draws on a new dataset on the performance of more than 20,000 projects funded by 12 donor agencies in 183 countries between 1956 and 2016—the largest dataset on foreign aid project outcomes compiled to date. The dataset contains holistic success ratings produced by donor staff and independent evaluation teams that capture the extent to which projects achieve their objectives and allocate resources efficiently. We employ a staggered difference-in-differences design that exploits temporal variation in the

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<sup>5</sup> Author interview of 5 April 2019.

<sup>6</sup> In the largest collection of data (of which we are aware) on an aid agency’s implementation arrangements, 93% of projects are implemented by recipient government institutions (authors’ calculations based on Table 1, Marchesi and Masi 2020).

adoption of ATI policies with and without a key enforcement mechanism: the existence of a formal recourse process that allows information seekers to appeal to an independent body when their requests are denied. We posit that this process improves project outcomes primarily through a *shadow of the future* mechanism: donor agencies, recipient governments, and other actors involved in project delivery take steps to preempt design and implementation problems that could be exposed by ATI policies at a later stage. That is, as the Bartın anecdote suggests, well-enforced ATI policies can provide information about and hence influence the behavior of donor as well as recipient government staff.

This research design has three attractive features. First, it yields empirical findings with high levels of external validity. We believe that a central reason for the mixed state of previous scholarship on the performance consequences of ATI policies is that it largely consists of single-setting studies (e.g., one country, one sector, one public agency) examining short time periods. Our collection of project data presents a rare opportunity to assess the impact of ATI policies on a large, diverse, and lengthy sample of performance outcomes. Second, the staggered adoption of ATI policies and appeals mechanisms across donors, combined with the wide temporal scope of projects in our dataset, provides the basis for plausible identification of their impact on project outcomes through a comparison of pre- and post-adoption trends in performance ratings. Third, and relatedly, the adoption of ATI policies and appeals processes by donor agencies is exogenous to the particular country contexts in which their projects are delivered. This feature is unusual in studies of the effects of transparency policies, where there is often a risk that the adoption of such policies is a function of factors that themselves affect the outcome of theoretical interest.

We find that the adoption of ATI policies by donors is not, in general, associated with improvements in the performance of projects they finance. However, when such policies are accompanied by independent appeals processes, we observe a strong and positive relationship with performance. These results are robust to a variety of estimation methods, model specifications, and samples as well as to the use of instrumental variables. We also recover evidence for several observable implications of our argument. The performance dividends associated with well-enforced ATI policies increase when recipient countries have higher levels of civic engagement and press freedom, conditions under which citizens are more likely to make use of these policies and to pressure authorities to improve project outcomes. In contrast, they decline when recipients have domestic ATI regimes and a greater capacity to control corruption and to maintain the rule of law, conditions under which project problems are less common and alternative mechanisms for exercising project oversight are available. Finally, consistent with our posited shadow of the future mechanism, we show that previous usage of and success with appeals mechanisms in a given recipient—which raise the probability that future projects will be subject to external scrutiny—are followed by better performance outcomes as well as increases in expenditures on and the quality of project design and supervision.

Our analysis contributes to a broader research agenda in political science and other disciplines that seeks to identify the circumstances in which transparency enhances the performance of public institutions. By highlighting the role of stakeholder-activated enforcement mechanisms in determining whether and when ATI policies enhance performance, our findings support an emerging consensus in this literature that—on their own—information and bottom-up monitoring are “not enough” (Fox 2015, 248). Instead, they point to the importance of the *interaction* between bottom-up monitoring and top-down

enforcement for holding public institutions to account. Our contextual results, moreover, add to a growing body of evidence that transparency interventions are more potent in environments characterized by greater civil society robustness, media freedom, and other forms of bottom-up accountability (Grossman and Mitchelitch 2015; Kosack and Fung 2014; Lindstedt and Naurin 2010).

In drawing attention to appeals processes as an instrument of enforcement, this study also contributes to research on the political consequences of formal mechanisms for receiving, assessing, and responding to complaints from stakeholders. Previous studies have demonstrated the potential of such mechanisms (and other nonelectoral methods of political participation) to increase government responsiveness to citizens (Bratton 2012; Cleary 2007). Our findings suggest an additional channel through which they can improve governance outcomes, namely, ensuring reliable mechanism enforcement. Finally, the study adds to a burgeoning literature on the effectiveness of foreign aid and donor agencies by examining the role of institutionalized transparency in shaping the impact of international development assistance (Buntaine 2016; Denizer et al. 2013; Dreher et al. 2013; Honig 2018, 2019; Lall 2017, 2020; Winters 2014).

## **Transparency, Enforcement, and Performance**

### *Access to Information Policies in Donor Agencies*

ATI policies establish a formal process through which public or private actors in any country can request information held by donor agencies, including about foreign aid projects they finance. Available information suggests that ATI requests are frequently



made both by actors “below” these agencies, such as citizens, civil society organizations (CSOs), media outlets, and academics, and by actors “above” them, such as governments and international organizations.<sup>7</sup> Domestic governance is a common topic of requests, underscoring the potential for donor ATI mechanisms to influence the behavior not just of aid agency staff but also of (mostly recipient government) implementers.<sup>8</sup>

For bilateral donor agencies, which are either national aid departments or state-owned development banks, ATI policies assume the form of government-wide freedom of information (FOI) laws (which are not adopted by agencies themselves). Most of these laws are based on the 1966 US Freedom of Information Act and were passed during the 1990s and 2000s as a consequence of civil society campaigns for increased public-sector transparency, domestic political competition, and international diffusion pressures (Banisar 2006; Berliner 2014; Florini 2007). Multilateral ATI policies take the form of binding rules approved by donor governing bodies. They are generally modeled on FOI laws and possess similar features, enshrining the principle that the public has a right to know about the activities of intergovernmental institutions. Since the World Bank’s pioneering 1994 Policy

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<sup>7</sup> To our knowledge, the only source of data on the identity of ATI requesters is the World Bank Access to Information Survey, which was conducted from 2011 to 2016 (available at <https://www.worldbank.org/en/access-to-information/reports>). Excluding academics, who are disproportionately represented among respondents to the survey, the vast majority of requesters are private individuals and CSOs (48%, averaged over all years), international organizations (16%), governments (11%), media outlets (5%), and legal professionals (2%). With respect to location, requesters are divided fairly evenly between OECD and non-OECD countries.

<sup>8</sup> The top five topics of request in the World Bank Access to Information Survey (averaging across years) are finance and markets (12%), domestic governance (11%), agriculture (10%), energy (8%), and transportation and communications (8%).

on Disclosure of Information, they have spread to a number of multilateral development banks and financing institutions, a trend generally attributed to factors analogous to those driving the spread of FOI laws, including transnational advocacy campaigns, norm diffusion pressures, and domestic political institutions (Grigorescu 2007; Nelson 2001).

**Table 1.** ATI Policies and Appeals Mechanisms Adopted by Donors in Dataset

<b>Donor agency</b>	<b>Acronym</b>	<b>Donor type</b>	<b>ATI policy (year adopted)</b>	<b>Independent appeals mechanism</b>
Department of Foreign Affairs and Trade, Australia	DFAT	Bilateral	Freedom of Information Act (1982)	Administrative Appeals Tribunal
Asian Development Bank	AsDB	Multilateral	Confidentiality and Disclosure of Information policy (1994)	None
			The Public Communications Policy of the Asian Development Bank (2005)	None
			Public Communications Policy (2011)	Independent Appeals Panel
African Development Bank	AfDB	Multilateral	Disclosure of Information Policy (1997)	None
			The African Development Group Policy on Disclosure of Information (2005)	None
			Disclosure and Access to Information: The Policy (2012)	Appeals Panel
Caribbean Development Bank	CDB	Multilateral	Caribbean Development Bank Information Disclosure Policy (2011)	Appeals Panel
Department for International Development, United Kingdom	DFID	Bilateral	Freedom of Information Act (2000)	Information Commissioner's Office
Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH, Germany	GIZ	Bilateral	Federal Act Governing Access to Information held by the Federal Government (Freedom of Information Act) (2005)	Federal Commissioner for Freedom of Information
Global Environment Facility	GEF	Multilateral	GEF Practices on Disclosure of Information (2011)	None
Global Fund to Fight AIDS, Tuberculosis and Malaria	GFATM	Multilateral	Documents Policy (2007)	None
International Fund for Agricultural Development	IFAD	Multilateral	IFAD Policy on the Disclosure of Documents (1998)	None
			IFAD Policy on the Disclosure of Documents (revised) (2006)	None
			IFAD Policy on the Disclosure of Documents (revised) (2010)	None
Japan International Cooperation Agency	JICA	Bilateral	Act on Access to Information Held by Administrative Organs (1999)	Information Disclosure and Personal Information Protection Review Board
Kreditanstalt fuer Wiederaufbau, Germany	KfW	Bilateral	Federal Act Governing Access to Information held by the Federal	Federal Commissioner for Freedom of Information

			Government (Freedom of Information Act) (2005)	
World Bank	WB	Multilateral	World Bank Policy on Disclosure of Information (1994)	None
			World Bank Policy on Disclosure of Information (revised) (2002)	None
			World Bank Policy on Access to Information (2010)	Access to Information Committee (first stage); Access to Information Appeals Board (second stage)

While the civic activist from Bartın was unsuccessful in her inquiry, most ATI requests do result in disclosure. The World Bank, for example, reports that of the 726 requests on which it made a decision in Fiscal Year 2017, 501 led to the release of the solicited information.<sup>9</sup> Importantly, the fruits of successful requests are made publicly available. All disclosures made by the World Bank, for instance, are posted on its official ATI website.<sup>10</sup>

### *Why the Right to Information Is Not Enough*

There are several reasons why ATI policies might be expected to improve the performance of public institutions. Expanded disclosure enhances the ability of citizens, CSOs, the media, and other stakeholders to monitor institutional activities (Anderson et al. 2019; Peisakhin 2012). If new information reveals poor performance, it can be used by political principals—whether legislators and the executive branch in the case of government agencies or member states in the case of international organizations—to sanction them

<sup>9</sup> World Bank Access to Information Annual Report: Fiscal Year 2017, available at: <http://pubdocs.worldbank.org/en/742661529439484831/WBG-AI-2017-annual-report.pdf>.

<sup>10</sup> <https://www.worldbank.org/en/access-to-information>.

(Berliner and Erlich 2015; Grigorescu 2007). As suggested by the *Bartın* case, even if no information is actually released, the threat of disclosure can motivate these actors to avoid behavior that could subsequently be punished. When aware that they are being monitored or that their actions may be publicly disclosed, bureaucrats are less likely to shirk or to engage in malfeasant practices (Anderson et al. 2019; Carlson and Seim 2020).

At the same time, there are reasons to doubt that ATI policies *alone* will always be sufficient to alter bureaucratic behavior. Rather than boosting their effort and productivity in response to such policies, bureaucrats may choose the less burdensome option of refusing to comply with legitimate ATI requests that could expose underperformance. Perhaps the least costly way to avoid compliance without technically violating policy provisions is to reject such requests on procedural, technical, resource-related, or availability grounds (Prat 2005; Holsen and Pasquier 2012). Since ATI requesters typically lack the information and expertise to contest such decisions—and disputes can easily be characterized as differences in the interpretation of ATI policy provisions—this form of noncompliance has the added advantage of being difficult to detect. Although illegitimate denials could be discovered by fellow bureaucrats, these actors similarly benefit from the ability to selectively conceal information about their performance and thus have weak incentives to actively monitor policy compliance—let alone to sanction noncompliance.

The implication of this agency problem is that ATI policies require reliable mechanisms of enforcement to successfully curtail bureaucratic slack—mechanisms that counterbalance incentives for noncompliance. As Neuman (2006, 10) emphasizes in the domestic context: “Enforcement of the law is critical; if there is widespread belief that [FOI] legislation will not be enforced, this so-called right to information becomes meaningless. If the enforcement

mechanisms are weak or ineffective, it can lead to arbitrary denials, or it can foment the ‘ostrich effect,’ whereby there is no explicit denial but rather the government agencies put their heads in the sand and pretend that the law does not exist. Thus, some external review mechanism is critical to [an FOI] law’s overall effectiveness.”

### *Independent Appeals Processes*

The principal mechanism for enforcing ATI policies is the existence of a formal recourse process that enables information seekers to appeal to an independent body—a body of individuals who do not report to any member of the donor’s staff—when their requests are denied. For multilateral donors, these bodies are usually panels of external ATI experts from civil society, business, or government with the authority to uphold or reverse original disclosure decisions. For bilateral donors, they are judicial institutions responsible for overseeing overall government adherence to FOI legislation and in some cases for imposing or recommending penalties for noncompliance (Holsen and Pasquier 2012). For example, if an ATI request submitted to the United Kingdom’s Department for International Development (DFID) is rejected, the information seeker can appeal to the Information Commissioner’s Office (ICO), a non-departmental public body that reports to the British parliament and is authorized to enforce compliance with such requests.<sup>11</sup> As reported in Table 1, nine of the 12 donors in our dataset possessed an ATI policy with an independent appeals mechanism as of 2016.

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<sup>11</sup> DFID was merged with the British Foreign Office in June 2020; as all our data are prior to the merger, we continue to use its former name.

In addition to enhancing compliance with ATI requests, appeals mechanisms can boost confidence in and usage of the request process and set precedents that clarify the scope of ATI policy provisions (Hazell and Worthy 2010). In 2008, for example, an ICO ruling forced DFID to disclose the winning tender proposal for a consultancy contract along with the scores awarded to all submitted proposals.<sup>12</sup> This ruling set a precedent within DFID for the automatic acceptance of ATI requests for tender-related information. In 2015, for instance, DFID accepted an ATI request for tender documents associated with forensic audits of two banks in Anguilla submitted by Keith Stone Greaves, a local journalist who sought to disseminate information of public interest on his weekly radio program, *Talk Caribbean*. As he explained to us, “I just wanted to inform the public...The public had a right to know what was happening with their banks.”<sup>13</sup>

#### *ATI Policies and Foreign Aid Effectiveness*

The performance benefits of a properly enforced ATI policy are no less applicable to foreign aid projects. Unlike direct budgetary support for governments, these projects are characterized by a lengthy chain of delegation involving politicians and aid agencies in donor countries; government agencies and contractors in recipient countries, which typically implement projects; and intended beneficiaries in project locations. Information asymmetries within each principal-agent relationship frequently short-circuit the feedback loop between the two ends of the delegation chain (Easterly 2007). Regardless of the identity and motivation of those who use it, a well-enforced ATI policy can help to address

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<sup>12</sup> ICO Decision Notice #FS50088016, 27 November 2008.

<sup>13</sup> Author telephone interview with Keith Stone Greaves, 11 March 2019.

this problem by generating reliable and timely public information about projects. This increases the likelihood that behavior causing project outcomes to diverge from objectives or resources to be allocated wastefully or unproductively—whether by donors, recipient governments, or other project-involved actors (all of whose activities fall within the scope of donor ATI policies)—will be detected and sanctioned.

Specifically, appeals processes can improve project outcomes through two distinct mechanisms. The first is a *project correction effect* whereby an appeal concerning a given project leads to performance-enhancing modifications to this same project, whether by generating new information about its design or implementation (if the appeal is successful) or by prompting officials to pay greater attention to potential performance threats (if the appeal is unsuccessful). The second is a *shadow of the future effect* whereby officials strengthen project design and implementation in anticipation of future appeals that could reveal performance problems (Buntaine 2016). As the Bartın case suggests, even ATI requests and appeals that concern completed projects (and are ultimately denied) can increase bureaucrats’ awareness that they are being monitored.

Project correction effects may be important; anecdotal evidence indicates that appeals can markedly alter the behavior of officials involved with concerned projects. However, we expect project improvements to occur primarily through shadow of the future effects. As a proportion of total projects, the number of appeals cases tends to be small.<sup>14</sup> Additionally, most appeals are submitted after the concerned project has concluded—that is, when new

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<sup>14</sup> For instance, the World Bank, which possesses one of the most high-profile appeals mechanisms, adjudicated 71 appeals cases between 2010 and mid-2019, a period in which it conducted hundreds of projects.

information cannot be used to remedy project problems.<sup>15</sup> Although empirically distinguishing between these two types of effects is challenging, we later provide evidence of shadow of the future effects and the channels through which they operate.

The preceding discussion can be summarized in the following hypotheses:

**H1:** *The adoption of ATI policies by donors will not, by itself, be associated with an improvement in the performance of projects that they finance; however,*

**H2:** *The adoption of ATI policies that include independent appeals mechanisms will be associated with an improvement in project performance.*

The logic of our argument also implies that these relationships are likely to be conditioned in several ways by the broader societal and institutional context in which projects are delivered. First, ATI policies with appeals mechanisms should lead to a greater improvement in project performance when recipient countries are characterized by higher levels of bottom-up accountability, particularly in the form of civic engagement and press freedom. In many countries, citizens have limited opportunities to engage in sustained collective action or to access reliable information about public agencies via the media, making them less likely to learn about and utilize ATI policies; to activate appeals mechanisms when ATI requests are denied; and to leverage information from successful requests or appeals to pressure donors and recipient governments to address project

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<sup>15</sup> Only 10 of the World Bank's 71 appeals cases received a final decision before the completion of the project in question.



problems (Buntaine 2016). Second, the performance payoff of well-enforced ATI policies should be larger when recipient countries lack characteristics of good governance, such as the rule of law and limited corruption, which reduce the likelihood of project problems and create alternative channels through which stakeholders can obtain information about and demand action to address such issues. Third, this payoff should be smaller when recipients possess (strong) domestic ATI regimes, which provide an alternative pathway for local stakeholders to acquire project information. If these regimes are functioning effectively, donor ATI policies should generate less additional information (and this information should mostly concern donor staff rather than other actors involved in the project delivery process). Fourth, given the central thrust of the argument, the previous three implications should not apply to ATI policies in general (only to those with appeals mechanisms).

**H3:** *The adoption of ATI policies that include independent appeals mechanisms—but not ATI policies in general—will have a stronger positive association with project performance in recipient countries with higher levels of bottom-up accountability, lower levels of governance quality, and a weak or no domestic ATI regime.*

## **Data**

### *Outcome Variable*

In line with a growing literature on foreign aid effectiveness, we measure project performance using holistic, ex-post success ratings assigned by donor staff and independent evaluation experts (Denizer et al. 2013; Dreher et al. 2013; Buntaine 2016; Honig 2018, 2019). These ratings, which are based on a series of widely accepted OECD evaluation

standards, capture two principal dimensions of performance: (1) the achievement of project objectives (as stated in official project agreements between donors and recipients); and (2) efficiency, or the economy with which project inputs (e.g., material resources, time, expertise) are converted into project outputs.<sup>16</sup> They represent an attractive source of data because they provide a consistent and comparable measure of performance across projects, sectors, countries, and time.<sup>17</sup> In addition, previous research has demonstrated that they are positively correlated with broader indicators of socioeconomic development (Warner 2010; Metzger and Guenther 2015).

Through a large-scale data collection effort that began in 2012 and involved extensive communications and negotiations with donor staff and evaluation teams, we obtained ratings for 20,686 projects financed by 12 donors between 1956 and 2016 (essentially all projects rated by the donors during this period).<sup>18</sup> These ratings cover projects undertaken in almost every developing country and sector of government activity. Online Appendix A (p. 3) provides donor-by-donor descriptive statistics on project location, geographical scope, timing, and length.

**Figure 1.** Trends in Project Success Ratings for Individual Donors

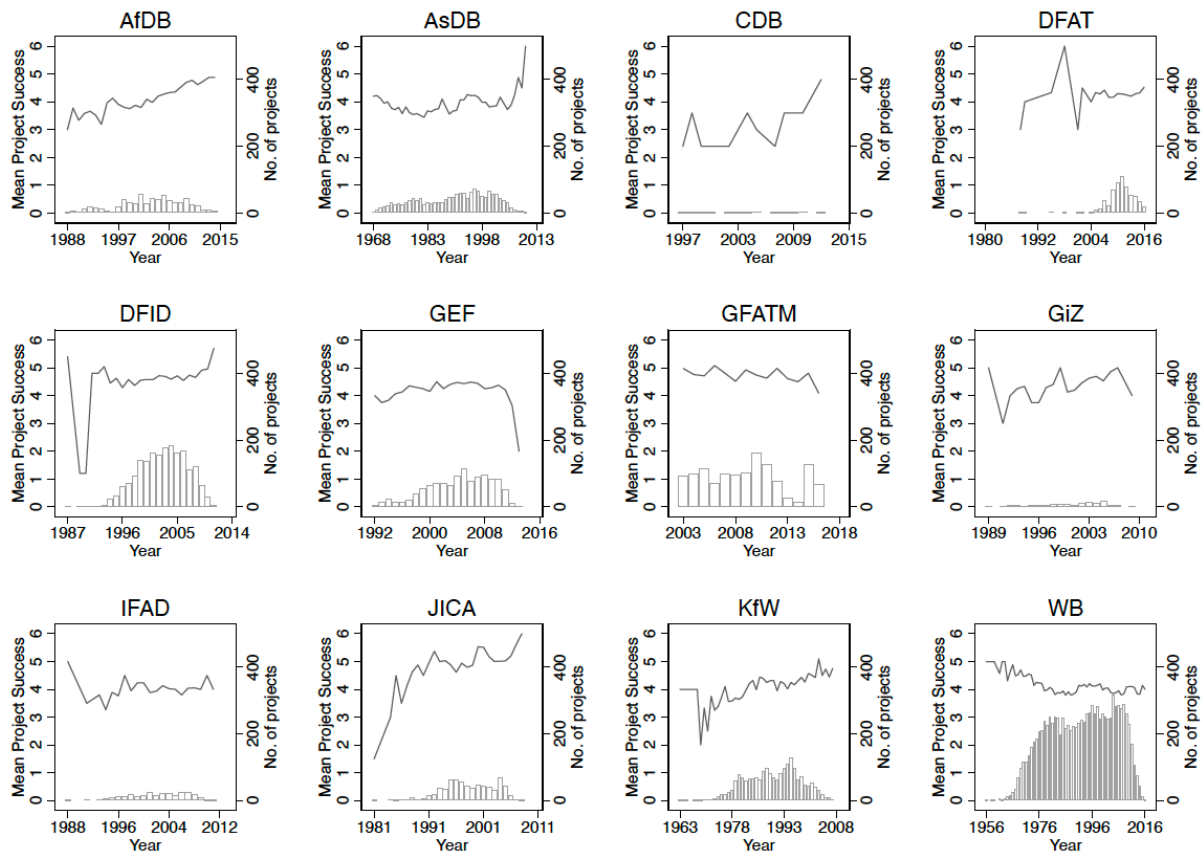
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<sup>16</sup> The OECD standards are available at

<https://www.oecd.org/dac/evaluation/qualitystandardsfordevelopmentevaluation.htm>.

<sup>17</sup> Moreover, the inclusion of donor fixed effects in our analyses absorb any time-invariant differences in donors' evaluation standards.

<sup>18</sup> An earlier version of the database was introduced by Honig (2018). The current version adds several donors and roughly doubles the number of projects.



*Note:* Lines correspond to the left  $y$ -axis, bars to the right  $y$ -axis.

The outcome variable in our analysis,  $Project\ Success_{r,d,t}$ , is the rating for a project financed by donor  $d$  in recipient country  $r$  beginning in year  $t$ , which is measured on a Likert-type scale ranging from 1 for “highly unsatisfactory” to 6 for “highly satisfactory.”<sup>19</sup> As shown Figure 1, there are no consistent over-time trends in the variable across donors: some donors exhibit evidence of modest “grade inflation”, with average ratings rising over time;

<sup>19</sup> These classifications follow the World Bank’s rating system, which is the best known. Some donors employ alternative scales (e.g., from 1 to 4); we transform them to the six-point scale for ease of analytical interpretation.

others have experienced a decline in ratings in recent years; and a third group has seen ratings fluctuate around an approximately constant level.<sup>20</sup> Donor-specific summary statistics for *Project Success*<sub>*r,d,t*</sub> are also reported in Online Appendix A (p. 3).

### *Treatment Variables*

We merge the project ratings with original data on donor ATI policies, which cover the same agencies and time period. Our first treatment variable, *ATI Policy*<sub>*d,t-1*</sub>, is a dummy for whether donor *d* possesses an ATI policy in year *t* – 1. Our main source of information on FOI laws is the Right to Information Rating database compiled by Access Info Europe and the Centre for Law and Democracy.<sup>21</sup> We access multilateral ATI policies from donor websites (current and archived). Our second treatment, *Appeals Mechanism*<sub>*d,t-1*</sub>, is a dummy for whether donor *d* possesses an ATI policy with an independent appeals process for denied information requests in year *t* – 1. Where possible, our coding decisions follow the Right to Information Rating database and the Aid Transparency Index constructed by Publish WhatYou Fund, the two existing comparative assessments of ATI appeals mechanisms.

### *Control Variables*

We control for three recipient country-level variables that commonly feature in analyses of project performance: the annual growth rate of a recipient’s GDP per capita (*Recipient GDP*

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<sup>20</sup> As indicated by Figure 1’s frequency bars, the World Bank accounts for a sizable share (around half) of the projects in the dataset. We later show that our findings are not contingent upon its inclusion in the sample.

<sup>21</sup> <https://www.rti-rating.org>.

*per Capita Growth* $_{r,t-1}$ ); the log of a recipient’s GDP per capita (*Recipient Log GDP per Capita* $_{r,t-1}$ ); and the net official development assistance provided to a recipient as a percentage of its gross national income (*Recipient Aid/GNI* $_{r,t-1}$ ). These variables are measured as of year  $t - 1$  in current US dollars using World Bank national accounts data.<sup>22</sup> As they do not plausibly affect the treatment variables, their inclusion serves to reduce residual variance and thus increase the precision of the estimated treatment effects.

**Table 2.** Summary Statistics for Variables in Baseline Analysis

Variable	Observations	Mean	Std. Dev	Min	Max
Project Success $_{r,d,t}$	20,687	4.20	1.17	1	6
ATI Policy $_{d,t-1}$	21,301	0.48	0.50	0	1
Appeals Mechanism $_{d,t-1}$	21,301	0.15	0.36	0	1
Recipient GDP per Capita Growth $_{r,t-1}$	23,963	2.80	6.01	-65.00	140.50
Recipient Log GDP per Capita $_{r,t-1}$	23,886	7.57	1.31	4.75	11.88
Recipient Aid/GNI $_{r,t-1}$	20,932	7.10	10.76	-2.63	242.29

Table 2 provides summary statistics for all variables in the dataset. Detailed descriptions of each variable are provided in Online Appendix A (pp. 2-3).

## Empirical Analysis

We employ a difference-in-differences design that compares the change in the outcome following the adoption of each treatment in treated versus untreated observations. The unit of analysis is a donor-recipient-project-year (there are 12 donors, 183 recipient countries,

<sup>22</sup> <https://data.worldbank.org/indicator>.

and 60 years). To assess H1, we estimate the following three-way fixed effects model with OLS:

$$Project\ Success_{r,d,t} = \alpha + \phi_d + \gamma_r + \psi_t + \beta_1 ATI\ Policy_{d,t-1} + \beta_2 Controls_{r/d,t-1} + \varepsilon_{r,d,t} \quad (1)$$

where  $\phi_d$ ,  $\gamma_r$ , and  $\psi_t$  are dummies for donors, recipient countries, and years, respectively. With the inclusion of these fixed effects, the estimator exploits variation in project ratings *within* groups of donor-recipient observations over time, addressing many possible sources of endogeneity while avoiding direct inter-donor comparisons, which could be problematic due to the partly subjective nature of performance evaluation (Honig 2019). All covariates are lagged by one year in part to avoid simultaneity issues and in part because they are unlikely to instantly impact project performance. To address the possibility of serial correlation in the outcome, we cluster robust standard errors by both recipient country and donor.

We assess H2 in two ways. First, we substitute *Appeals Mechanism*<sub>d,t-1</sub> for *ATI Policy*<sub>d,t-1</sub> in Equation 1:

$$Project\ Success_{r,d,t} = \alpha + \phi_d + \gamma_r + \psi_t + \beta_1 Appeals\ Mechanism_{d,t-1} + \beta_2 Controls_{r/d,t-1} + \varepsilon_{r,d,t} \quad (2)$$

Second, we add *ATI Policy*<sub>d,t-1</sub> to Equation 2:

$$Project\ Success_{r,d,t} = \alpha + \phi_d + \gamma_r + \psi_t + \beta_1 ATI\ Policy_{d,t-1} + \beta_2 Appeals\ Mechanism_{d,t-1} + \beta_3 Controls_{r/d,t-1} + \varepsilon_{r,d,t} \quad (3)$$

In Equation 2, the coefficient on *Appeals Mechanism*<sub>d,t-1</sub> captures the difference between the change in the success of projects that are treated with an ATI policy with an appeals mechanism and the same change for projects that are subject either to no ATI policy or to an ATI policy without an appeals mechanism. In Equation 3, the control group shrinks to projects that are subject to an ATI policy without an appeals mechanism, allowing us to isolate the “added value” of enforcement.

### Results

The results of Equations 1-3, reported in Table 3, are consistent with H1 and H2. In Equation 1, the estimated coefficient on *ATI Policy*<sub>d,t-1</sub> is positive but small and not statistically distinguishable from zero (Model 1). In substantive terms, the presence of an ATI policy (with or without an appeals mechanism) is associated with an average increase in *Project Success*<sub>r,d,t</sub> of 0.02 (on a 1-6 scale). In percentile terms, this increase does not alter the rank of a project at the median level of *Project Success*<sub>r,d,t</sub> by a single percentage point.

**Table 3.** Relationship between ATI Policies, Appeals Mechanisms, and Project Success

<i>Outcome:</i> Project Success <sub>t</sub>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.020 (0.097)		-0.067 (0.066)
Appeals Mechanism <sub>t-1</sub>		0.290** (0.081)	0.320** (0.084)
Recipient GDP per Capita Growth <sub>t-1</sub>	0.006**	0.006**	0.006**

	(0.001)	(0.001)	(0.001)
Recipient Log GDP per Capita <sub>t-1</sub>	-0.187*	-0.184*	-0.184*
	(0.072)	(0.071)	(0.072)
Recipient Aid/GNI <sub>t-1</sub>	0.001	0.001	0.001
	(0.001)	(0.001)	(0.001)
Observations	17,929	17,929	17,929
R-squared	0.131	0.133	0.133
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes

*Note:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses.

\*\* p<0.01, \* p<0.05, † p<0.1

In Equation 2, by contrast, the coefficient on *Appeals Mechanism*<sub>d,t-1</sub> is positive, substantially larger, and statistically significant at the 1% level (Model 2). On average, *Project Success*<sub>r,d,t</sub> is 0.29 higher in the presence of an ATI policy with an appeals mechanism—several times the increase associated with the presence of an ATI policy in general. Substantively, this effect size is equivalent to moving from the 50<sup>th</sup> percentile of *Project Success*<sub>r,d,t</sub> to almost the 60<sup>th</sup> percentile.

Including both treatments as regressors in Equation 3 does not materially alter the size or significance level of the *Appeals Mechanism*<sub>d,t-1</sub> coefficient (Model 3). When ATI policies are accompanied by an appeals mechanism, *Project Success*<sub>r,d,t</sub> is 0.32 higher than when they lack such a mechanism. Perhaps surprisingly, the coefficient on *ATI Policy*<sub>d,t-1</sub> turns negative, indicating that the presence of an ATI policy without an appeals mechanism is associated with lower levels of project performance than the absence of an ATI policy altogether. As in Model 1, however, the coefficient is nonsignificant and substantively



small:  $Project\ Success_{r,d,t}$  declines by an average of just 0.07 as  $ATI\ Policy_{d,t-1}$  moves from 0 to 1.

## **Robustness**

### *Parallel Trends Assumption*

The key identifying assumption of difference-in-differences estimators is that trends in the outcome variable would have been the same in treated and control groups in the absence of the treatment, conditional on covariates. We probe this assumption using two common strategies. First, we include 1-8 year leads and lags as well as a contemporaneous version of  $Appeals\ Mechanism_d$  in Equation 2, with the expectation that the coefficients on the leads will be statistically zero. While year-by-year effects are relatively noisy, none of the lead coefficients are significant. Second, we show that the results are robust to the inclusion of recipient-specific time trends in the model (i.e., interactions between a dummy for each recipient and a linear time trend), which help to control for differences in the pretreatment trajectory of the outcome between the treated and control groups.<sup>23</sup> Online Appendix B reports both sets of estimates (p. 4).

### *Validating Outcome Measure*

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<sup>23</sup> We cannot control for donor-specific time trends because the set of interactions between donor dummies and a linear time trend would fully absorb the treatment. Figure 1, however, provides visual evidence that these trends do not systematically differ between treated and control groups in the pretreatment period.

Although project outcomes are evaluated according to a common set of criteria and standards, it is possible that staff are able to “game” ratings to improve perceptions of their performance (Denizer et al. 2013). If such behavior begins concurrently with the adoption of well-enforced ATI policies—for instance, due to increased pressures for effective performance from political principals—it could pose a threat to valid inference. We seek to address this concern in two ways. First, we reestimate the baseline models using an independent measure of World Bank project success constructed by Malik and Stone (2018), which is derived from more granular (qualitative and quantitative) information about projects contained in Implementation Completion and Results reports.<sup>24</sup> Second, we reestimate the baseline models restricting the sample to projects that were rated when donors possessed an independent unit (e.g., division, department, office) whose primary task is to evaluate their performance. As shown in Online Appendix C, both sets of results are consistent with the baseline findings (pp. 5-6).

### *Assessing Inferential Leverage*

Given the size and heterogeneity of our dataset, it is important to understand where inferential leverage is coming from in our analysis. We investigate this issue using two recently developed strategies. First, we calculate the “effective sample” in Equations 1 and 2—the sample actually used to generate the estimates—using the multiple regression

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<sup>24</sup> The correlation between *Project Success*<sub>*r,d,t*</sub> and Malik and Stone’s measure is positive but far from perfect ( $r = 0.43$ ).

weights approach proposed by Aronow and Samii (2016).<sup>25</sup> Summary statistics for this sample indicate that it is broadly representative of the dataset as a whole (and thus that the findings have strong internal validity). Second, we perform a Bacon decomposition (Goodman-Bacon 2018) on the *Appeals Mechanism*<sub>*d,t*+1</sub> coefficient in Equation 2, which disaggregates it into four separate two-period difference-in-differences estimates that compare (1) projects treated in different years, (2) projects treated in a given year with always-treated projects; (3) projects treated in a given year with never-treated projects, and (4) always-treated projects with never-treated projects. All four estimates are large and positive. Online Appendix D reports the two tests' results (pp. 6-7).

### *Alternative Samples*

We also examine the sensitivity of the baseline results to six alternative sample restrictions: (1) including only projects that began during a five-year window around the date of treatment adoption,  $j$  (i.e., the period from  $j - 2$  to  $j + 2$ ), which helps to control for potential confounders that vary between the pre- and posttreatment periods; (2) including only projects that began either before or immediately after year  $j$ , which mitigates the possibility that donors select “easier” projects after treatment adoption; (3) excluding projects conducted after (a) 1990, (b) 1995, and (c) 2000 on the grounds that older projects might have been rated according to different standards; (4) excluding projects financed by the World Bank, the donor with the largest number of projects; (5) excluding projects undertaken in the five recipients with the largest number of projects (collectively around

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<sup>25</sup> Multiple regression weights can only be calculated with one treatment at a time, hence the exclusion of Equation 3 (the overall coefficient estimate does not substantively change).

one-fifth of the total); and (6) excluding projects financed by donors that never adopt an ATI policy with an appeals mechanism. All results are similar to the baseline estimates (see Online Appendix E, pp. 8-10).

### *Instrumental Variables Analysis*

While the adoption of ATI policies can reasonably be viewed as exogenous to recipient-specific factors, it could nevertheless be affected by omitted variables related to project success—or by project success itself (e.g., if donors with better-performing projects are more willing to disclose information about themselves).<sup>26</sup> To address this possibility, we employ an instrumental variables approach that leverages sources of plausibly exogenous variation in policy adoption. Building on evidence of the diffusion of FOI laws across countries (Berliner 2014) and a common spatial instrumenting strategy in the political economy literature, we construct two instruments for bilateral donors: (1) the lagged proportion of a donor's (a) geographical neighbors and (b) five largest trading partners that possess an FOI law with an appeals mechanism (for *Appeals Mechanism<sub>d,t-1</sub>*) or without an appeals mechanism (for *ATI Policy<sub>d,t-1</sub>*). Our instrument for multilateral donors is the lagged proportion of a donor's five largest shareholder countries that possess an ATI policy with an appeals mechanism (for *Appeals Mechanism<sub>d,t-1</sub>*) or without an appeals mechanism (for *ATI Policy<sub>d,t-1</sub>*). The logic behind these instruments is that the adoption of an ATI policy by a donor's neighbors, major trading partners, and principal shareholders—or variables that predict this occurrence—are likely to influence its own likelihood of adoption but do not

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<sup>26</sup> The latter scenario is less likely in the case of bilateral donors, which, as discussed earlier, have typically adopted ATI policies laws due to factors with little connection to foreign aid outcomes.

directly affect the outcome of foreign aid projects it finances (rendering the exclusion restriction credible).

We implement the instrumental variables analysis using a two-stage least squares estimator. In the first stage, we generate predicted values for each treatment by regressing it on one of the two combined instruments and all controls and fixed effects in the baseline models:

$$Treatment_{d,t1} = \alpha + \gamma_r + \phi_d + \psi_t + \beta_1 Combined\ Instrument_{d,t1} + \beta_2 Controls_{r,t1} + \varepsilon_{r,d,t}. \quad (4)$$

In the second stage, *Project Success<sub>r,d,t</sub>* is regressed on the predicted values of the treatment from the first stage as well as all controls and fixed effects:

$$Project\ Success_{r,d,t} = \alpha + \gamma_r + \phi_d + \psi_t + \beta_1 \widehat{Treatment}_{d,t1} + \beta_2 Controls_{r,t1} + \varepsilon_{r,d,t}. \quad (5)$$

Table 4 presents the second-stage results for the three baseline models. In the first stage, as reported in the bottom row, the instrument has a high F-Statistic in every model, ruling out possible bias from a “weak” instrument. All coefficients on the instrumented measures of *Appeals Mechanism<sub>d,t1</sub>* are positive, sizable, and significant. Interestingly, they are much larger than the corresponding baseline estimates: on average, the presence of an ATI policy with an appeals mechanism is associated with an increase in *Project Success<sub>r,d,t</sub>* of 0.74—equivalent to moving from the 50<sup>th</sup> percentile of this variable to the 90<sup>th</sup> percentile. The coefficients on the instrumented measures of *ATI Policy<sub>d,t1</sub>* are positive in the Equation 1 models, negative in the Equation 3 models, and mostly nonsignificant (the only significant

estimate is negative). The results thus provide additional support for H1 and H2 while suggesting that any potential endogeneity in treatment assignment in the baseline analysis worked *against* rather than for our argument.

**Table 4.** Instrumental Variables Estimates (Second Stage)

<i>Outcome:</i> Project Success <sub>t</sub>	(1)	(2)	(3)	(4)	(5)	(6)
ATI Policy <sub>t-1</sub>	0.013 (0.148)		-0.265* (0.092)	0.229 (0.194)		-0.256 (0.229)
Appeals Mechanism <sub>t-1</sub>		0.678* (0.235)	0.937** (0.238)		0.590** (0.182)	0.746** (0.188)
Observations	16,943	16,943	16,943	16,943	16,943	16,943
Recipient Country, Donor, & Year FEs	Yes	Yes	Yes	Yes	Yes	Yes
Controls	Yes	Yes	Yes	Yes	Yes	Yes
Instrument reference group	Neighbors	Neighbors	Neighbors	Trading partners	Trading partners	Trading partners
Cragg-Donald F-Statistic (first stage)	7912	4740	2313	3821	6538	2468

*Notes:* Second-stage two-stage least squares estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

### *Placebo Test*

Another possible concern is that *Appeals Mechanism<sub>d,t-1</sub>* is merely serving as a proxy for the overall stringency or quality of a donor’s disclosure regime. We thus conduct a placebo test in which the treatment is a dummy for whether an ATI policy codifies a “presumption of disclosure” principle, that is, a provision that establishes disclosure as the general rule and

hence requires a compelling reason for nondisclosure. Often regarded as a hallmark of a robust disclosure regime (Mendel 1999), this principle is one of the chief indicators of ATI policy strength in both the Right to Information Rating Database and the Aid Transparency Index. The coefficient on the placebo treatment is small, negative, and nonsignificant (see Online Appendix F, p. 11).

### *Additional Robustness Checks*

The baseline results are robust to a number of additional checks, further information on which is provided in Online Appendix G (pp. 12-20). First, we include several additional controls, some of which feature in previous analyses of project performance: project size, measured in terms of loan amount, loan commitment, or project expenditures; project sector dummies; and a dummy for recipient membership of the United Nations Security Council, which has been shown to influence project ratings (Kilby and Michaelowa forthcoming). Second, we instead omit all controls. Third, we examine whether our findings systematically vary between bilateral and multilateral donors and between project regions by disaggregating the sample by these categories.<sup>27</sup> Fourth, to examine whether *Appeals Mechanism*<sub>*d,t*-1</sub> leads to changes in the types of projects being financed (e.g., toward “easier” recipients or sectors), we examine its relationship with (1) recipient country income, (2) the number of projects by donor-sector-year, and (3) the number of projects by donor-recipient-

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<sup>27</sup> While the coefficient on *Appeals Mechanism*<sub>*d,t*-1</sub> exhibits some variation across donors, there is no consistent difference in its size and strength between the two groups. It is similar across regions but marginally weaker for projects in the Middle East and Africa.

sector-year.<sup>28</sup> Fifth, following an approach taken by some studies, we collapse *Project Success*<sub>r,d,t</sub> into a binary variable based on its sample (1) mean, (2) median, and (3) maximum. Sixth, we employ longer lags for the treatments. Seventh, rather than converting them to a common scale, we leave ratings in their raw form. Eighth, we experiment with an alternative coding of *Appeals Mechanism*<sub>d,t-1</sub>. Ninth, we control for donor-recipient dyad fixed effects. Finally, we estimate standard errors using three alternative techniques: (1) nonparametric bootstrapping; (2) clustering by donor only; and (3) clustering by donor × recipient country.

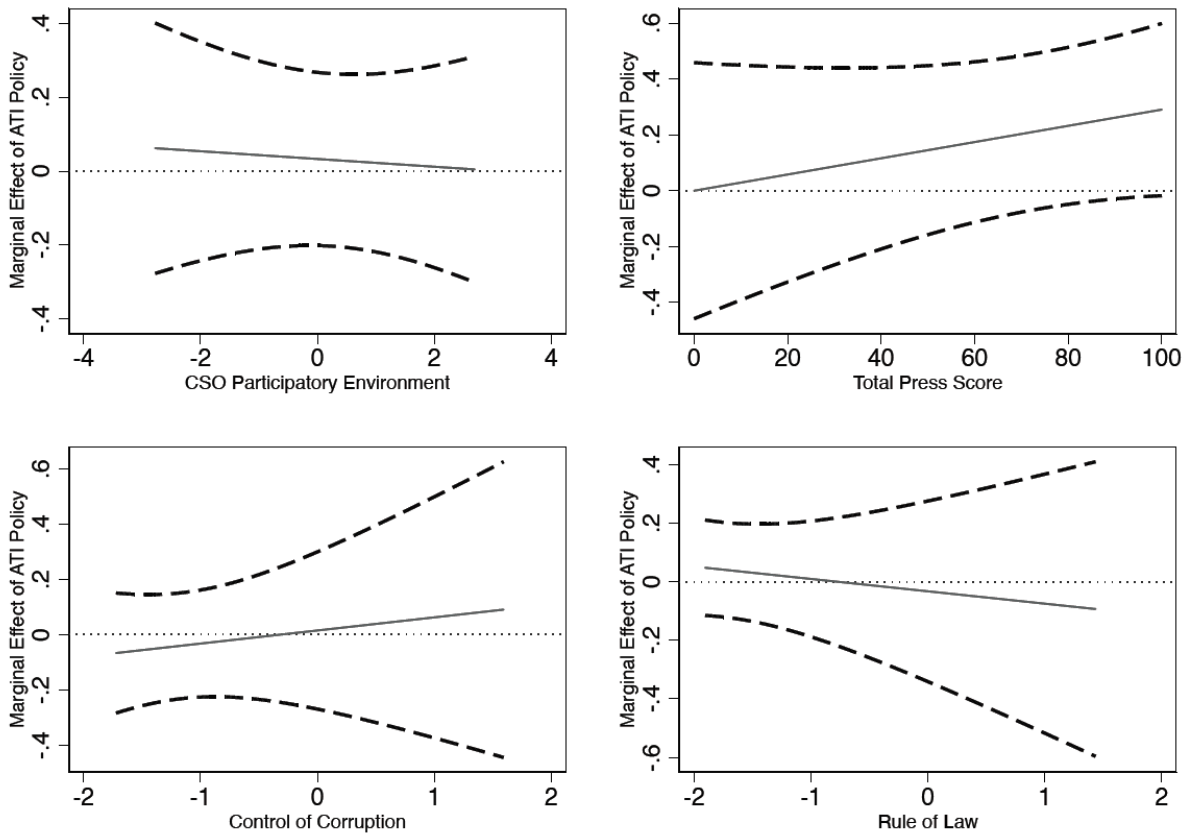
### *Recipient Country Context*

**Figure 2.** Marginal Effects of *ATI Policy* on *Project Success* at Varying Levels of Bottom-Up Accountability and Governance Quality

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<sup>28</sup> We find no association in any of these models.



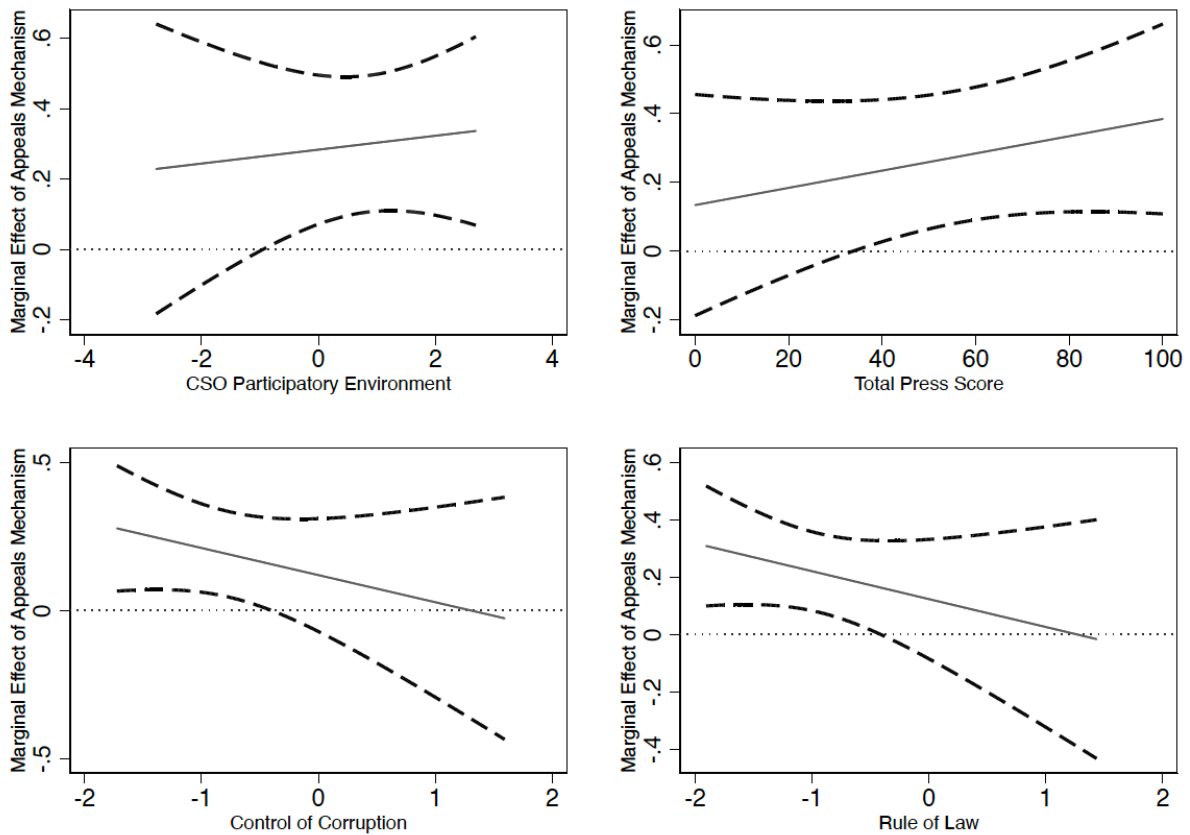


*Note:* Dashed lines represent 95% confidence intervals. See Online Appendix H (p. 21) for underlying regression estimates.

To evaluate H3, we include in Equations 1 and 2 interactions between the treatment and five recipient-level variables: (1) a measure of popular involvement in CSOs from the Varieties of Democracy dataset (Coppedge et al. 2018); (2) a composite index of media freedom from the Freedom of the Press dataset (Freedom House 2018); (3) indices of the rule of law and control of corruption from the Worldwide Governance Indicators database;<sup>29</sup> and (4) dummies for the presence of (a) a domestic FOI law and (b) a domestic FOI law with an appeals mechanism.

<sup>29</sup> <https://info.worldbank.org/governance/wgi>.

**Figure 3.** Marginal Effects of *Appeals Mechanism* on *Project Success* at Varying Levels of Bottom-Up Accountability and Governance Quality



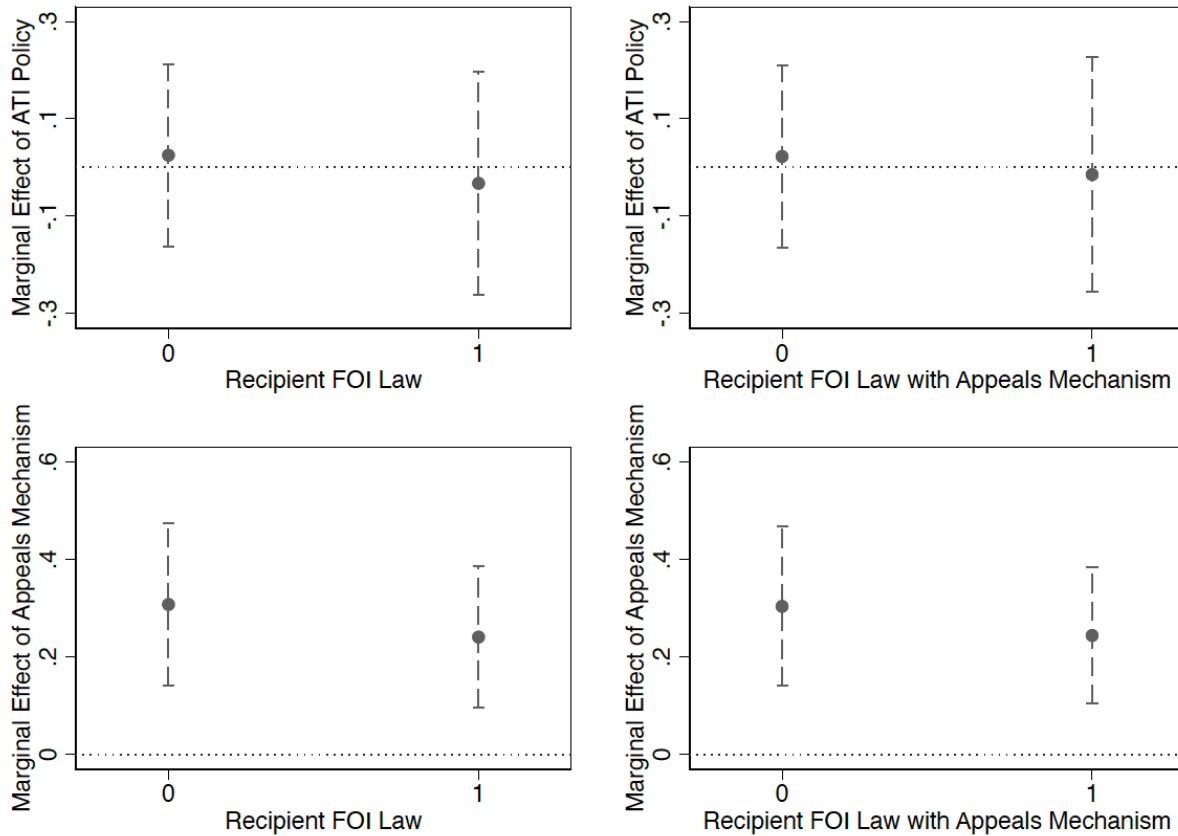
*Note:* Dashed lines represent 95% confidence intervals. See Online Appendix H (p. 22) for underlying regression estimates.

The results are consistent with each part of the hypothesis. As shown in Figure 2, the estimated marginal effect of  $ATI\ Policy_{d,t-1}$  on  $Project\ Success_{r,d,t}$  remains small and statistically indistinguishable from 0 across all levels of the first four moderators.<sup>30</sup> In contrast, the marginal effect of  $Appeals\ Mechanism_{d,t-1}$ , plotted in Figure 3, increases with the two measures of bottom-up accountability, attaining significance only at high values of

<sup>30</sup> Underlying regression results are reported in Online Appendix H (pp. 21-23).

these variables, and decreases with the two measures of governance quality, attaining significance only at low values of these variables (bottom row). On average, *Appeals Mechanism*<sub>*d,t*1</sub> is associated with a rise in *Project Success*<sub>*s,d,t*</sub> of 0.18 at the minimum values of the bottom-up accountability measures and of 0.39 at the maximum values; and a rise of 0.33 at the minimum values of the governance quality measures and of almost exactly 0 at the maximum values. Finally, as shown in Figure 4, the marginal effect of *Appeals Mechanism*<sub>*d,t*1</sub> becomes slightly smaller yet remains positive and significant when the two FOI law dummies turn from 0 to 1. This shift is very similar for each dummy, reflecting the fact that most recipients in our sample possess FOI laws with appeals mechanisms. The marginal effect of *ATI Policy*<sub>*d,t*1</sub> remains close to zero and nonsignificant at both levels of the dummies.

**Figure 4.** Marginal Effects of Treatment Variables on *Project Success* across Varying Recipient Country ATI Regimes



*Note:* Dashed lines represent 95% confidence intervals. See Online Appendix H (pp. 22-23) for underlying regression estimates.

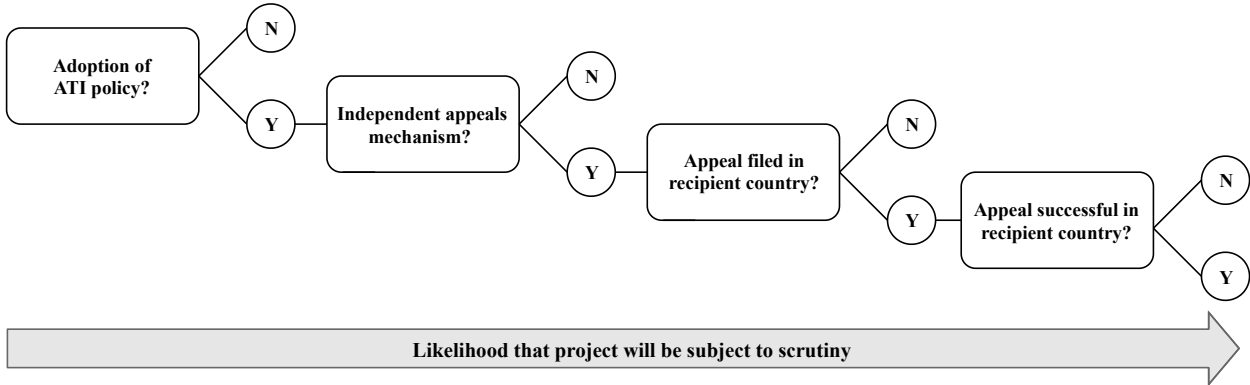
## Exploring Additional Implications

### *Local Appeals Shocks, Design, and Supervision*

In this section, we explore several additional implications of our argument. If our theoretical logic is correct, the likelihood that ATI policies with appeals mechanisms will lead to increased project scrutiny should be higher when stakeholders in recipient countries have previously used these mechanisms—and even higher when they have used them to *successfully* challenge an ATI denial (see Figure 5). Hence, the submission of appeals in a

given recipient country should be associated with improved project outcomes in this country, while the submission of successful appeals should be associated with an even greater improvement. Furthermore, we should expect these localized appeals “shocks” to not only enhance project performance but also to trigger intermediate behavioral changes by officials responsible for delivering projects, in particular the allocation of greater effort and resources to project preparation and supervision (signaling a reduction in agency slack).

**Figure 5.** Additional Implications: Factors Affecting Likelihood of Project Scrutiny



*Note:* The diagram, which should be read from left to right, depicts how the likelihood of project scrutiny changes over key stages of the ATI request and appeals processes.

We assess these implications by analyzing a large collection of World Bank projects from the past three decades. We focus on these projects for three reasons. First, unlike other donors in our dataset, the World Bank publishes a comprehensive online list of its ATI appeals cases that includes information on concerned projects. Second, via an ATI request, we were able to obtain micro-level data on budgetary allocations made by local World Bank staff for project design and supervision activities. We use these data to construct parallel

measures of design and supervision effort: *Preparation Cost Ratio*<sub>*r,t*</sub>, expenditures on project preparation activities as a percentage of the total project budget; and *Supervision Cost Ratio*<sub>*r,t*</sub>, expenditures on project supervision activities as a percentage of this budget. Third, the World Bank’s Independent Evaluation Group (IEG) has evaluated more than 9,000 projects on the quality of their design (*Quality at Entry*<sub>*r,t*</sub>) and their supervision (*Quality of Supervision*<sub>*r,t*</sub>) since 1991.<sup>31</sup> Both indicators have the same 1-6 ordinal scale as the World Bank’s project ratings.

To test the implications described above, we make two sets of changes to Equation 2. First, we specify our measures of project design and supervision effort and quality—*Preparation Cost Ratio*<sub>*r,t*</sub>, *Supervision Cost Ratio*<sub>*r,t*</sub>, *Quality at Entry*<sub>*r,t*</sub>, and *Quality of Supervision*<sub>*r,t*</sub>—as separate outcome variables alongside *Project Success*<sub>*r,d,t*</sub>. Second, we replace *Appeals Mechanism*<sub>*t-1*</sub> with three alternative treatments: (1) *Appeals Shocks*<sub>*r,t-1*</sub>, the number of projects in recipient country *r* that have previously been the subject of an ATI appeal as of year *t* – 1; (2) *Successful Appeals Shocks*<sub>*r,t-1*</sub>, the number of such projects that have been the subject of a successful appeal; and (3) *Unsuccessful Appeals Shocks*<sub>*r,t-1*</sub>, the number of such projects that have been the subject of an unsuccessful appeal. There are thus five outcome variables and three treatments, which combine to produce 15 different models:

$$\left\{ \begin{array}{l} \textit{Project Success}_{r,t} \\ \textit{Preparation Cost Ratio}_{r,t} \\ \textit{Supervision Cost Ratio}_{r,t} \\ \textit{Quality at Entry}_{r,t} \\ \textit{Quality of Supervision}_{r,t} \end{array} \right. = \alpha + \gamma_r + \psi_t + \beta_1 \left\{ \begin{array}{l} \textit{Appeals Shocks}_{r,t} \\ \textit{Successful Appeals Shocks}_{r,t} \\ \textit{Unsuccessful Appeals Shocks}_{r,t} \end{array} \right. + \quad (6)$$

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<sup>31</sup> World Bank Project Performance Ratings Dataset, available at: <https://datacatalog.worldbank.org/dataset/ieg-world-bank-project-performance-ratings>.

$$\beta_2 \text{Controls}_{r,t} + \varepsilon_{r,d,t}$$

As reported in Table 5, the results are consistent with each implication. The coefficient on the treatment is positive and significant or close to significant in all 15 models. All coefficients on *Successful Appeals Shocks*<sub>r,t-1</sub> are significant and larger than those on *Appeals Shocks*<sub>r,t-1</sub>. The estimated treatment effects hence accrue disproportionately to projects that are likely to be subject to more intense external scrutiny, suggesting that shadow of the future effects are a key channel through which properly enforced ATI policies enhance project outcomes.

**Table 5.** Analysis of World Bank Project Design, Supervision, and Success

<i>Outcome:</i>	Project Success	Preparation Cost Ratio	Supervision Cost Ratio	Quality at Entry	Quality of Supervision
	(1)	(2)	(3)	(4)	(5)
Appeals Shocks <sub>r,t-1</sub>	0.318** (0.063)	0.003† (0.001)	0.006** (0.002)	0.156*** (0.054)	0.135† (0.076)
Observations	8,816 (6)	2,736 (7)	2,640 (8)	6,271 (9)	6,830 (10)
Successful Appeals Shocks <sub>r,t-1</sub>	1.170** (0.188)	0.010* (0.004)	0.022** (0.007)	0.891** (0.313)	0.833** (0.131)
Observations	8,816 (11)	2,736 (12)	2,640 (13)	6,271 (14)	6,830 (15)
Unsuccessful Appeals Shocks <sub>r,t-1</sub>	0.341** (0.077)	0.003 (0.002)	0.007* (0.003)	0.144* (0.065)	0.161 (0.113)
Observations	8,816	2,736	2,640	6,271	6,830
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Controls	Yes	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>.

\*\*\* p<0.01, \*\* p<0.05, † p<0.1

### *Corruption Risks*

Another implication of our argument is that the increased scrutiny of projects that comes with the adoption of ATI policies with appeals mechanisms should reduce the risk of corrupt project procurement practices, such as setting tendering terms that only one firm can satisfy and awarding contracts to the same few well-connected firms. To probe this implication, we replace *Project Success<sub>r,d,t</sub>* in Equation 2 with eight indicators of project corruption risk from a dataset recently compiled by Dávid-Barret and Fazekas (2020), which covers tender processes conducted for several thousand World Bank, Inter-American Development Bank, and European Commission projects since 1991. As reported in Online Appendix I (p. 24), *Appeals Mechanism<sub>d,t-1</sub>* is associated with a decline in this risk on the majority of indicators.

### *Volume of Requests and Denials*

A third set of implications concerns the volume and success of ATI requests submitted to donors. If we are correct in arguing that appeals mechanisms reduce the likelihood of legitimate ATI requests being arbitrarily rejected, we should expect their adoption to (1) encourage the use of ATI policies and (2) reduce the proportion of denied requests. The only donor in our sample that discloses data on the number of ATI requests it has received both before and after adopting an appeals mechanism is the Asian Development Bank (AsDB). As illustrated in Online Appendix J (pp. 25-28), these data show that the average number of requests per year soared almost 40-fold after adoption, while the average proportion of



denied requests fell by more than 90 percentage points.<sup>32</sup> Two additional donors in our dataset—the World Bank and the African Development Bank—began releasing information on request numbers only after they introduced an appeals mechanism.<sup>33</sup> This information similarly reveals a clear upward trend over time: on average, the number of requests submitted to the two donors has increased by 66.2% annually.

## **Discussion and Conclusion**

Our empirical analysis offers a window into understanding whether and under what conditions ATI policies improve the performance of public institutions. Foreign aid is an attractive context in which to explore this issue from an inferential perspective—most notably since the adoption of ATI policies by donor agencies is plausibly exogenous to the country contexts in which projects take place—but also a challenging one. Intended beneficiaries are not taxed for the goods and services they receive; nor do they typically have voice, vote, or exit options when they are adversely affected. Indeed, few mechanisms are available for holding donors to account if aid projects harm local communities and ecosystems, fail to achieve development assistance goals, or violate host government regulations. These unfavorable conditions cause many projects to falter during their design or implementation phase (Easterly 2007; Winters 2014).

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<sup>32</sup> Available at <https://www.adb.org/site/disclosure/information-requests>.

<sup>33</sup> Available at <https://www.worldbank.org/en/access-to-information/reports>; <https://www.afdb.org/en/disclosure-and-access-to-information>.

Yet our findings suggest that even in these circumstances, ATI policies can help to repair the broken feedback loop between public institutions and beneficiaries by reducing information asymmetries within the multiple principal-agent chains connecting them. Critically, however, this fix requires more than the mere right to request information from these institutions: we find no evidence that the adoption of ATI policies alone leads to better average project outcomes. However, we do observe such an improvement when ATI policies are accompanied by recourse mechanisms that allow information seekers to appeal rejected requests via an independently managed process—a process that, in effect, prevents bureaucrats from avoiding compliance with valid inquiries.

In addition, we find that ATI policies with appeals mechanisms have a stronger association with project success when recipient countries have higher levels of civic engagement and press freedom, forms of bottom-up accountability that make it easier for citizens to take advantage of ATI policies and appeals processes and to pressure donors and recipient governments to respond to evidence of poor performance. The association also strengthens when recipient countries have less capacity to control corruption and maintain the rule of law and lack a domestic ATI regime—that is, when existing avenues for obtaining project information and for exercising political influence are few and far between. Thus, there is evidence that strong donor ATI policies are *substitutes* for—not complements to—domestic ATI regimes. Adding such policies to a well-functioning accountability system may make little marginal difference to performance outcomes; there appears to be an upper bound to what ATI policies can accomplish.

Micro-level evidence of the consequences of ATI appeals at the recipient country level is consistent with a shadow of the future effect: the filing of local appeals is associated with

increased project success as well as design and supervision expenditures and quality, and successful appeals cases are associated with even greater such rises. This suggests that as the level of expected scrutiny received by projects increases, so too does the effort and resources that donor and recipient government staff devote to planning and implementing them. These costs, together with those of administering ATI policies, are not trivial; yet the gains in project performance that accompany them may still make them a worthwhile investment.

A clear implication of our findings, therefore, is that the design of ATI policies—and the context in which they are implemented—matter. One contextual feature on which our analysis sheds less light is organizational setting. The donors in our sample do not constitute the universe of aid agencies, and these agencies may be atypical of public institutions more generally (as suggested above). Since aid beneficiaries are not citizens of the wealthy nations that supply aid bilaterally and exercise the greatest influence over multilateral aid allocation, donor ATI policies fill an oversight gap that may be more severe for donor-financed than recipient-financed projects. That said, the finding that these policies—when reliably enforced—can serve as a substitute for domestic oversight mechanisms suggests that they yield important performance and accountability dividends beyond aid agencies.

Nor should the findings be taken to imply that appeals processes are always needed for ATI policies to improve institutional performance.<sup>34</sup> Some public organizations—aid agencies or otherwise—may possess alternative mechanisms for enforcing ATI policies or a deep-rooted culture of transparency that renders such provisions superfluous. In some circumstances, appeals processes may even backfire by encouraging bureaucrats to focus on administrative procedures rather than substantive performance-enhancing activities.

Nevertheless, the findings suggest that procedures for collecting, evaluating, and addressing complaints from stakeholders *can* be a potent instrument for deterring noncompliance—an instrument that harnesses the benefits of both bottom-up monitoring and top-down enforcement. The moderating effects of country characteristics, moreover, provide evidence that carefully designed transparency interventions go hand in hand with broader processes of social and political liberalization in these countries. At the same time, improvements in the quality of domestic governance may render such interventions less effective by establishing alternative channels through which citizens can learn about, scrutinize, and influence government activities. From a policy perspective, then, the results underscore the need to pay close attention both to the institutional design features of transparency interventions and to the political, socioeconomic, and organizational environment into which such interventions are introduced.

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<sup>34</sup> Indeed, our finding that the association between donor ATI policies with appeals mechanisms and project success becomes slightly weaker when recipients possess FOI laws *without* appeals mechanisms is consistent with the possibility that such laws may—at least in some cases—be effective on their own.

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# Online Appendices for “When Does Transparency Improve Institutional Performance? Evidence from 20,000 Projects in 183 Countries”

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## A. Additional Information on Dataset

Table A1. Full Description of Variables in Dataset

Variable name	Description	Scale	Source
<i>Project Success</i>	Holistic, ex-post rating of project success produced by donor staff, specialized evaluation units, and external evaluators	Ordinal	Authors' original dataset
<i>ATI Policy</i>	Measure of whether a donor possesses an ATI policy	Binary	Authors' original dataset
<i>Appeals Mechanism</i>	Measure of whether a donor possesses an ATI policy with an independent appeals process for denied information requests	Binary	Authors' original dataset
<i>Recipient GDP per Capita Growth</i>	Recipient country's GDP per capita growth rate	Continuous (percentage)	World Development Indicators dataset
<i>Recipient Log GDP per Capita</i>	Log of recipient country's GDP per capita (in millions of US dollars)	Continuous (logarithmic)	World Development Indicators dataset
<i>Recipient Aid/GNI</i>	Net official development assistance provided to a recipient country as a percentage of its gross national income	Continuous (ratio)	World Development Indicators dataset
<i>CSO Participatory Environment</i>	Recipient country-level measure of popular involvement in civil society organizations	Ordinal, converted to interval by the measurement model	Varieties of Democracy dataset
<i>Total Press Freedom</i>	Recipient country-level measure of press freedom based on laws and regulations, political pressures, economic factors, and repressive actions (e.g., violence, harassment, censorship) that influence media content.	Continuous	Freedom of the Press dataset
<i>Control of Corruption</i>	Recipient country-level measure of control of corruption, capturing perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests	Continuous	Worldwide Governance Indicators dataset

<b><i>Rule of Law</i></b>	Recipient country-level measure of the rule of law, capturing perceptions of confidence in and compliance with the rules of society, in particular the quality of contract enforcement, property rights, the police, and the courts	Continuous	Worldwide Governance Indicators dataset
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**Table A2.** *Project Success* (Outcome Variable) by Donor

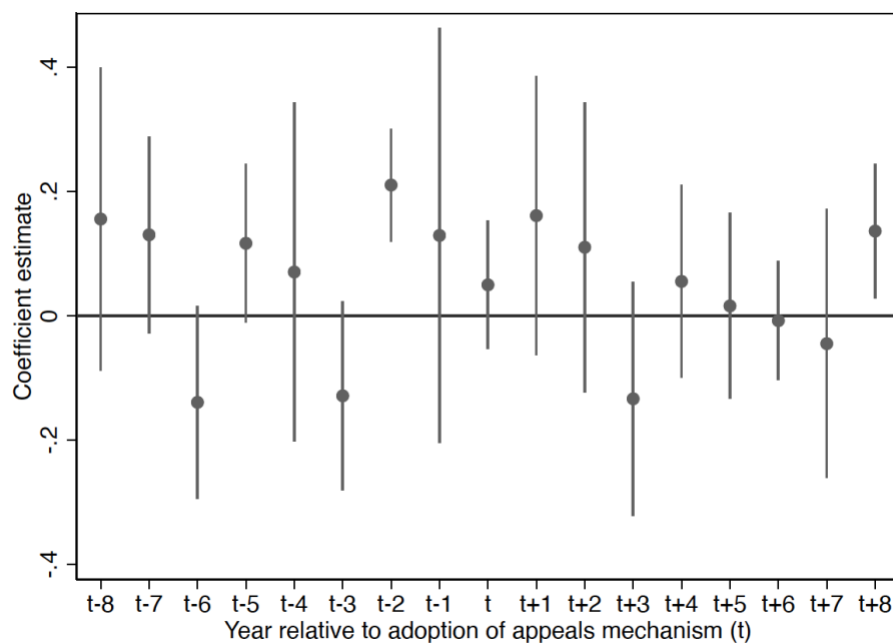
Donor	Observations	Mean	Std. Dev.	Max	Min	Range
AfDB	684	4.14	0.71	6.00	1.95	4.05
AsDB	1,572	3.89	1.05	6.00	1.50	4.50
CDB	21	3.20	0.79	4.80	1.20	3.60
DFAT	610	4.27	0.73	6.00	2.00	4.00
DFID	1,917	4.62	0.97	6.00	1.20	4.80
GEF	1,169	4.32	0.96	6.00	1.00	5.00
GFATM	1,286	4.75	1.25	6.00	1.50	4.50
GiZ	130	4.47	0.87	6.00	2.00	4.00
IFAD	286	4.00	0.80	6.00	2.00	4.00
JICA	716	4.99	1.20	6.00	1.50	4.50
KfW	2,021	4.16	1.11	6.00	1.00	5.00
WB	10,274	4.05	1.23	6.00	1.00	5.00
Overall	20,686	4.20	1.17	6.00	1.00	5.00

**Table A3.** Descriptive Statistics on Rated Projects by Donor

Donor	No. projects	No. multi-country projects	No. unique countries	Mean project rating	Mean project length	Start year	End year
AfDB	684	55	52	4.14		1988	2015
AsDB	1572	0	41	3.89	7.97	1968	2013
CDB	21	2	11	3.20		1997	2015
DFAT	610	154	23	4.27	6.05	1988	2016
DFID	1917	0	99	4.62		1987	2014
GEF	1169	290	132	4.32		1992	2016
GFATM	1286	45	128	4.75	4.56	2003	2018
GiZ	130	0	67	4.47	7.74	1989	2010
IFAD	286	0	86	4.00		1988	2012
JICA	716	0	86	4.99	5.78	1981	2011
KfW	2021	0	108	4.16	7.95	1963	2008
WB	10274	195	162	4.05	5.99	1956	2016

## B. Testing Parallel Trends Assumption

**Figure A1.** Results of Equation 2 with Leads, Lags, and Contemporaneous Measure of *Appeals Mechanism*



**Table A4.** Baseline Results Controlling for Recipient Country-Specific Trends

<i>Outcome</i> : Project Success <sub>t</sub>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	-0.039 (0.094)		-0.148* (0.065)
Appeals Mechanism <sub>t-1</sub>		0.305** (0.087)	0.380** (0.093)
Observations	18,489	18,489	18,489
R-squared	0.318	0.319	0.320
Recipient Country-Specific Trends	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses.

\*\* p<0.01, \* p<0.05, † p<0.1

## C. Validating Outcome Measure

Malik and Stone’s measure of project success covers 4,206 World Bank projects—approximately 3,300 of which are in our dataset—conducted between 1994 and 2013. This measure is based on the extraction of more granular information about projects from Implementation Completion and Results (ICR) reports produced by World Bank project teams.<sup>1</sup> Specifically, Malik and Stone identify all project sub-objectives listed in a given ICR and, drawing on qualitative and quantitative information in this report, generate a progress score for each one (on an ordinal 0-4 scale).<sup>2</sup> They then average scores across sub-objectives into an overall performance rating for the project. These ratings should be less susceptible to bias both because they were not produced by World Bank staff and because they guarantee that progress on every project sub-objective is assessed separately and equally weighted. The correlation between our outcome variable, *Project Success<sub>r,d,t</sub>*, and Malik and Stone’s performance index is positive but far from perfect ( $r = 0.43$ ).

**Table A5.** Baseline Results with Malik and Stone Measure of Project Performance

<i>Outcome: Project Success<sub>t</sub></i>	(1)
Appeals Mechanism <sub>t-1</sub>	0.290** (0.093)
Observations	3,296
R-squared	0.088
Controls	Yes
Recipient Country Fixed Effects	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

<sup>1</sup> The World Bank’s Independent Evaluation Group (IEG) audits a subset of ICRs (and the scores therein). Due to resource constraints, field-based audits (“Project Performance Assessment Reports” or PPARs) are conducted for 20-30% of ICRs and desk-based audits (“ICR Reviews” or ICRRs) are conducted for 70-80% of ICRs.

<sup>2</sup> A score of 0 indicates zero or negative progress; 1 indicates that up to one third of the sub-objective was achieved; 2 indicates that between one third and two thirds of the sub-objective was achieved; 3 indicates that at least two thirds but less than 100% of the sub-objective was achieved; and 4 indicates 100% achievement or overachievement.



**Table A6.** Baseline Results with Sample Restricted to Years with Independent Evaluation Unit

<i>Outcome: Project Success<sub>t</sub></i>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.099 (0.157)		0.072 (0.084)
Appeals Mechanism <sub>t-1</sub>		0.369* (0.148)	0.361* (0.124)
Observations	11,771	11,771	11,771
R-squared	0.151	0.153	0.153
Controls	Yes	Yes	Yes
Fixed Effects	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

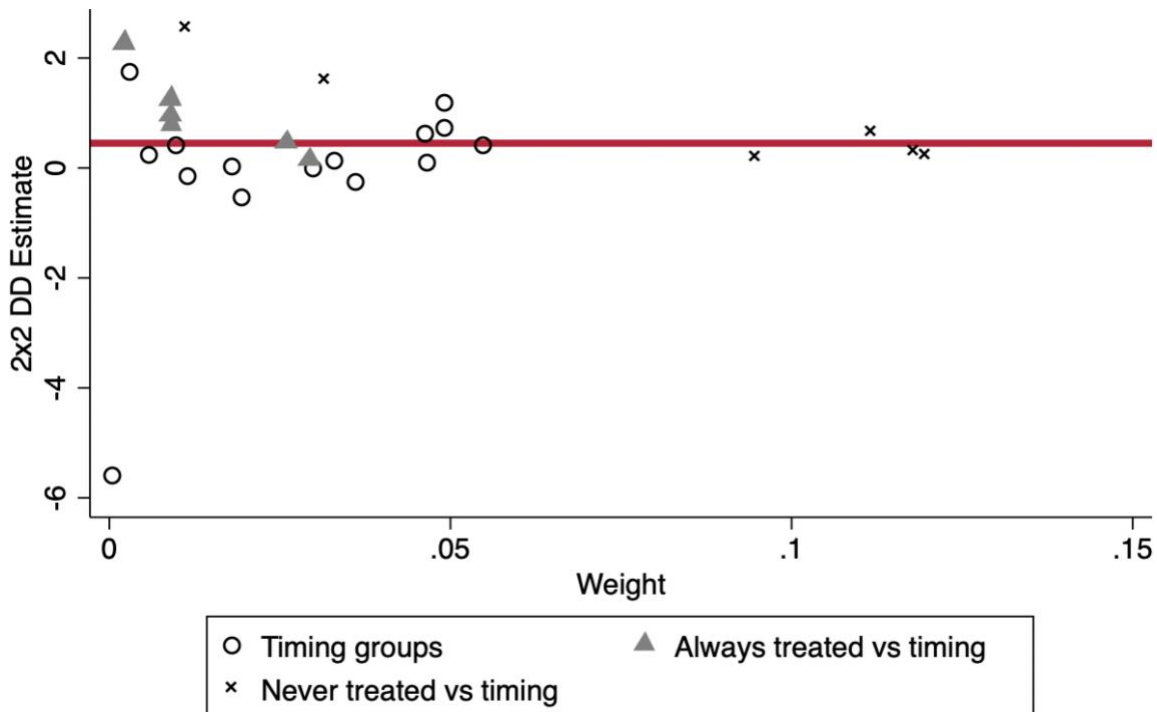
#### D. Assessing Inferential Leverage

**Table A7.** Bacon Decomposition of Coefficient on *Appeals Mechanism<sub>t-1</sub>* in Equation 2

Two-period difference-in-differences estimator	Beta	Total Weight
Treated in different years	0.332	0.414
Treated in given year vs. always treated	0.57	0.085
Treated in given year vs. never treated	0.471	0.481
Always treated vs. never treated	4.175	0.001
Within variation (due to controls)	-1.683	0.013

*Notes:* Output of `bacondecomp` command in Stata. The command requires collapsing the data into a donor-year panel (the aggregate coefficient estimate does not substantively change). “Within variation” captures variation in the evolution of covariates across projects sharing the same treatment.

**Figure A2.** Scatterplot of Bacon Decomposition Results



Overall DD Estimate = .45051715  
 Always vs never treated = 4.1747313 (weight = .01255245)  
 Within component = -1.682611 (weight = .01255245)

*Note:* Output of **bacondecomp** command in Stata.

**Table A8.** Effective Samples for Equations 1 and 2

	Nominal sample			Effective sample, Equation 1			Effective sample, Equation 2		
	Obs.	Mean	Std Dev.	Obs.	Mean	Std Dev.	Obs.	Mean	Std Dev.
Project Success <sub>r,d,t</sub>	20686	4.20	1.17	17,929	4.46	1.11	17,929	4.38	1.14
ATI Policy <sub>d,t1</sub>	21301	0.48	0.50	18,339	0.71	0.45	18,339	0.48	0.50
Appeals Mechanism <sub>d,t1</sub>	21301	0.15	0.36	18,339	0.48	0.50	18,339	0.17	0.38
Recipient GDP per Capita Growth <sub>r,t1</sub>	23963	2.80	6.01	18,330	3.28	4.58	18,330	3.16	5.41
Recipient Log GDP per Capita <sub>r,t1</sub>	23886	7.57	1.31	18,330	7.20	0.97	18,330	7.14	0.95
Recipient Aid/GNI <sub>r,t1</sub>	20932	7.10	10.76	18,202	7.29	10.49	18,202	7.35	9.96

*Note:* The effectives samples are calculated using Aronow and Samii’s (2016) multiple regression weights procedure.

## E. Alternative Sample Restrictions

**Table A9.** Equation 2 Results with Sample Restricted to Five-Year Window around Treatment Adoption

<i>Outcome: Project Success<sub>t</sub></i>	(1)
Appeals Mechanism <sub>t-1</sub>	0.293** (0.054)
Observations	1,734
R-squared	0.264
Controls	Yes
Recipient Country Fixed Effects	Yes
Donor Fixed Effects	Yes
Year Fixed Effects	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A10.** Equation 2 Results with Sample Restricted to Projects Starting Close to and Before Treatment Adoption

<i>Outcome: Project Success<sub>t</sub></i>	(1)	(2)	(3)	(4)	(5)
Appeals Mechanism <sub>t-1</sub>	0.208 (0.134)	0.269 (0.150)	0.277† (0.136)	0.301* (0.121)	0.340* (0.118)
Observations	13,731	14,015	14,251	14,480	14,720
R-squared	0.111	0.116	0.118	0.119	0.123
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes
Controls	Yes	Yes	Yes	Yes	Yes
Projects Started Before Year $j + \dots$	1	2	3	4	5

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Year  $j$  is the date of treatment adoption. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A11.** Equation 2 Results with Sample Restricted to Recent Years

<i>Outcome</i> : Project Success <sub><i>t</i></sub>	(1)	(2)	(3)
Appeals Mechanism <sub><i>t-1</i></sub>	0.260** (0.074)	0.272** (0.080)	0.111** (0.032)
Observations	12,852	10,865	8,093
R-squared	0.153	0.159	0.193
Controls	Yes	Yes	Yes
Fixed Effects	Yes	Yes	Yes
Sample period	1990-2016	1995-2016	2000-2016

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>*t-1*</sub>, Recipient Log GDP per Capita<sub>*t-1*</sub>, and Recipient Aid/GNI<sub>*t-1*</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A12.** Equation 2 Results with Sample Excluding World Bank Projects

<i>Outcome</i> : Project Success <sub><i>t</i></sub>	(1)
Appeals Mechanism <sub><i>t-1</i></sub>	0.400** (0.046)
Observations	9,044
R-squared	0.100
Controls	Yes
Recipient Country Fixed Effects	Yes
Donor Fixed Effects	Yes
Year Fixed Effects	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>*t-1*</sub>, Recipient Log GDP per Capita<sub>*t-1*</sub>, and Recipient Aid/GNI<sub>*t-1*</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A13.** Equation 2 Results with Sample Excluding Five Most Common Recipient Countries (Indonesia, India, China, Pakistan, Bangladesh)

<i>Outcome: Project Success<sub>t</sub></i>	(1)
Appeals Mechanism <sub>t-1</sub>	0.259* (0.095)
Observations	14,378
R-squared	0.130
Controls	Yes
Recipient Country Fixed Effects	Yes
Donor Fixed Effects	Yes
Year Fixed Effects	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A14.** Equation 2 Results with Sample Excluding Projects Financed by Donors That Never Adopt Treatment

<i>Outcome: Project Success<sub>t</sub></i>	(1)
Appeals Mechanism <sub>t-1</sub>	0.317* (0.105)
Observations	15,694
R-squared	0.126
Controls	Yes
Recipient Country Fixed Effects	Yes
Donor Fixed Effects	Yes
Year Fixed Effects	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

## F. Placebo Test

It is possible that the main results are driven not by the presence not of an independent appeals mechanism per se, but of other ATI policy features that encourage disclosure. To explore this possibility, we re-estimate Equation 2 substituting *Appeals Mechanism*<sub>*t*-1</sub> for a dummy for whether an ATI policy contains a presumption of disclosure provision, that is, a provision stating that institutional information will be disclosed absent a compelling reason not to do so. As reported in Table A15, the presence of such a provision is neither positively nor strongly associated with project performance, suggesting that *Appeals Mechanism*<sub>*t*-1</sub> is not merely as a proxy for the general stringency of a given ATI policy.

**Table A15.** Baseline Results with Placebo Treatment (ATI Policy with Presumption of Disclosure Provision)

<i>Outcome</i> : Project Success <sub><i>t</i></sub>	(1)	(2)
ATI Policy <sub><i>t</i>-1</sub>		0.511** (0.102)
Presumption of Disclosure <sub><i>t</i>-1</sub>	-0.080 (0.086)	-0.549** (0.099)
Observations	17,929	17,929
R-squared	0.131	0.133
Recipient Country Fixed Effects	Yes	Yes
Donor Fixed Effects	Yes	Yes
Year Fixed Effects	Yes	Yes
Controls	Yes	Yes

*Notes*: OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>*t*-1</sub>, Recipient Log GDP per Capita<sub>*t*-1</sub>, and Recipient Aid/GNI<sub>*t*-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

## G. Additional Robustness Checks

### *Additional Controls*

**Table A16.** Baseline Results Controlling for Project Size

<i>Outcome: Project Success<sub>t</sub></i>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.025 (0.118)		-0.003 (0.072)
Appeals Mechanism <sub>t-1</sub>		0.383* (0.141)	0.384* (0.135)
Observations	11,947	11,947	11,947
R-squared	0.161	0.164	0.164
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes
Controls (Including Project Size)	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A17.** Baseline Results Controlling for Sector Fixed Effects

<i>Outcome: Project Success<sub>t</sub></i>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	-0.045 (0.095)		-0.076 (0.057)
Appeals Mechanism <sub>t-1</sub>		0.327* (0.147)	0.342† (0.159)
Observations	15,760	15,760	15,760
R-squared	0.157	0.158	0.158
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes
Sector Fixed Effects	Yes	Yes	Yes
Controls	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A18.** Baseline Results Controlling for Recipient Country UN Security Council Membership

<i>Outcome: Project Success<sub>t</sub></i>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.005 (0.088)		-0.075 (0.059)
Appeals Mechanism <sub>t-1</sub>		0.278** (0.073)	0.310** (0.080)
Observations	16,922	16,922	16,922
R-squared	0.124	0.126	0.126
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes
Controls (Including UNSC Membership)	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

*Excluding Controls*

**Table A19.** Baseline Results Omitting All Controls

<i>Outcome: Project Success<sub>t</sub></i>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.010 (0.096)		-0.077 (0.065)
Appeals Mechanism <sub>t-1</sub>		0.275** (0.080)	0.311** (0.080)
Observations	19,856	19,856	19,856
R-squared	0.130	0.132	0.132
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes
Controls	No	No	No

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses.

\*\* p<0.01, \* p<0.05, † p<0.1



*Disaggregation by Donor*

**Table A20.** Equation 2 Results with Outcome Variable Disaggregated by Donor

<i>Outcome: Project</i> <i>Success<sub>t</sub></i>	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Appeals Mechanism <sub>t-1</sub>	0.290** (0.081)	0.413* (0.171)				0.126* (0.063)			-0.052 (0.153)		0.700** (0.147)	0.219 (0.209)	0.123** (0.059)
Observations	17,929	597	1,426	13	447	1,652	772	1,160	93	256	668	1,844	8,877
R-squared	0.133	0.286	0.122	0.801	0.078	0.104	0.143	0.239	0.567	0.400	0.214	0.156	0.089
Donor	All	AfDB	AsDB	CDB	DFAT	DFID	GEF	GFATM	GiZ	IFAD	JICA	KfW	WB
Controls	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recipient Country													
Fixed Effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	No	No	No	No	No	No	No	No	No	No	No	No
Year Fixed Effects	Yes	No	No	No	No	No	No	No	No	No	No	No	No

*Notes:* OLS estimates with robust standard errors, clustered by recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

*Disaggregation by Region*

**Table A21.** Equation 2 Results with Outcome Variable Disaggregated by Region

<i>Outcome</i> : Project Success <sub>t</sub>	(1)	(2)	(3)	(4)	(5)	(6)
Appeals Mechanism <sub>t-1</sub>	0.408** (0.106)	0.477** (0.127)	0.326** (0.086)	0.302 (0.250)	0.467** (0.093)	0.143 (0.111)
Observations	3,891	1,400	2,727	1,283	2,731	5,881
R-squared	0.177	0.206	0.123	0.174	0.124	0.141
Donor	All	AfDB	AsDB	CDB	DFAT	DFID
Controls	Yes	Yes	Yes	Yes	Yes	Yes
Recipient Country						
Fixed Effects	Yes	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	No	No	No	No	No
Year Fixed Effects	Yes	No	No	No	No	No
Region	East Asia & Pacific	Europe & Central Asia	Latin America & Caribbean	Middle East & North Africa	South Asia	Sub- Saharan Africa

*Notes:* Logistic regression with robust standard errors, clustered by recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

*Posttreatment Project Selection*

We also check whether *Appeals Mechanism*<sub>d,t-1</sub> predicts project sector by (sequentially) replacing the outcome with dummies for the five most common sectors in the dataset. The relationship is weak in every model.

**Table A22.** Relationship between *Appeals Mechanism* and Project Characteristics

<i>Outcome</i> :	Low Income Recipient Country <sub>r,t</sub> (1)	Recipient Country GDP per Capita <sub>r,t</sub> (2)	No. of Projects by Donor-Sector-Year <sub>d,t</sub> (3)	No. of Projects by Donor-Recipient-Sector-Year <sub>r,d,t</sub> (4)
Appeals Mechanism <sub>t-1</sub>	-0.425 (0.458)	-0.008 (0.043)	-0.682 (0.787)	-0.003 (0.004)
Observations	8,611	18,330	18,408	3,368,664

Controls	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	No	Yes
Sector Fixed Effects	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes

OLS estimates with robust standard errors, clustered by donor and sector, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> (in Models 3 and 4 only), and Recipient Aid/GNI<sub>t-1</sub>. To group sectors across donors, all unique sector tags are classified into the most relevant sector in the World Bank’s classification scheme. For example, projects from GFATM tagged with the sector “Malaria” are sorted into “Health,” while IFAD projects tagged with the sector “Irrigation” are classed into the “Agriculture and Rural Development.” This allows us to tag most projects into one of 25 unique sectors. Projects with ambiguous sector tags were placed into a residual “Other” category.

\*\* p<0.01, \* p<0.05, † p<0.1

### *Reparametrizing Outcome Variable*

In the main analysis, we use the full richness of project success ratings, following Honig’s (2018, 2019) approach. However, another strand of the literature on aid effectiveness operationalizes these ratings as a binary variable (e.g., Denizer et al. 2013; Dollar and Svensson 2000; Dreher et al. 2013; Kilby 2009). The most common method is to classify projects as “successful” if their rating is greater than or equal to the sample median and “unsuccessful” if it is not. We assess the sensitivity of Equation 2’s results to three separate classification thresholds: the sample’s mean rating (Model 1), median rating (Model 2), and maximum rating (Model 3). Table A14 estimates each model logistic regression. The results are robust to all three reparameterizations with both estimation methods.

**Table A23.** Equation 2 Results with Binary Outcome Measures (Estimated with Logistic Regression)

<i>Outcome</i> : Binary measure of Project Success <sub>t</sub>	(1)	(2)	(3)
Appeals Mechanism <sub>t-1</sub>	0.776** (0.109)	0.738** (0.115)	0.932** (0.159)
Constant	1.835† (1.022)	-0.724 (0.796)	-4.709* (1.878)
Observations	17,889	17,867	16,803
Controls	Yes	Yes	Yes
Fixed Effects	Yes	Yes	Yes
Project Success <sub>t</sub> = 1 if value ≥	Mean	Median	Maximum

*Notes:* Logistic regression with robust standard errors, clustered by recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

### *Varying Lag Structures*

We also experiment with different lag structures for *Appeals Mechanism*<sub>t-1</sub>. The results of Equation 2 are not sensitive to our choice of a 1-year lag; indeed, as shown in Table A14, the results are even *stronger* with 2-, 3-, 4-year, and 5-year lags.

**Table A24.** Equation 2 Results with Varying Treatment Lags

<i>Outcome:</i> Project Success <sub>t</sub>	(1)	(2)	(3)	(4)
Appeals Mechanism <sub>t-2</sub>	0.289** (0.072)			
Appeals Mechanism <sub>t-3</sub>		0.264** (0.083)		
Appeals Mechanism <sub>t-4</sub>			0.291** (0.072)	
Appeals Mechanism <sub>t-5</sub>				0.281** (0.069)
Observations	17,698	17,439	17,137	16,817
R-squared	0.132	0.132	0.133	0.133
Controls	Yes	Yes	Yes	Yes
Fixed Effects	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

### *Retaining Original Project Ratings for Project Success*

**Table A25.** Baseline Equations with Original Project Ratings (Not Converted to Common Scale)

<i>Outcome:</i> Project Success <sub>t</sub>	(1)
Appeals Mechanism <sub>t-1</sub>	0.242**

	(0.058)
Observations	20,363
R-squared	0.239
Recipient Country Fixed Effects	Yes
Donor Fixed Effects	Yes
Year Fixed Effects	Yes
Controls	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>. Some rating scales are inverted to ensure consistency in direction.

\*\* p<0.01, \* p<0.05, † p<0.1

### *Alternative Coding of Independent Appeals Mechanism*

Publish What You Fund’s Aid Transparency Index codes the World Bank as possessing an ATI policy without an independent appeals mechanism. Publish What You Fund acknowledges the existence of such a mechanism but suggests that “it is limited and there is no right to appeal certain information items.”<sup>3</sup> While this decision runs counter to the conventional wisdom amongst aid practitioners, who generally consider the World Bank’s appeals mechanism as a robust one, Table A20 indicates that our results are robust to it.

**Table A26.** Equation 2 with Alternative Coding of *Appeals Mechanism* for World Bank

<i>Outcome:</i> Project Success <sub>t</sub>	(1)
Appeals Mechanism <sub>t-1</sub>	0.414** (0.100)
Observations	17,929
R-squared	0.134
Controls	Yes
Recipient Country Effects	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

<sup>3</sup> <http://www.publishwhatyoufund.org/the-index/2016/donor/world-bank-ida/>

*Controlling for Donor-Recipient Dyad Fixed Effects*

**Table A27.** Baseline Equations Controlling for Donor-Recipient Dyad Fixed Effects

Outcome: Project Success <sub>t</sub>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.008 (0.052)		-0.062 (0.053)
Appeals Mechanism <sub>t-1</sub>		0.255** (0.055)	0.282** (0.061)
Observations	17,805	17,805	17,805
R-squared	0.175	0.177	0.177
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Donor × Recipient Country Fixed Effects			
Year Fixed Effects	Yes	Yes	Yes
Controls	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

*Alternative Estimation of Standard Errors*

**Table A28.** Baseline Results with Bootstrapped Standard Errors

Outcome: Project Success <sub>t</sub>	(1)
Appeals Mechanism <sub>t-1</sub>	0.290** (0.034)
Observations	17,929
R-squared	0.133
Controls	Yes
Recipient Country Fixed Effects	Yes
Donor Fixed Effects	Yes
Year Fixed Effects	Yes

*Notes:* OLS estimates with bootstrapped standard errors in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A29.** Baseline Results with Standard Errors Clustered on Donor

Outcome: Project Success <sub>t</sub>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.020 (0.102)		-0.067 (0.072)
Appeals Mechanism <sub>t-1</sub>		0.290** (0.083)	0.320** (0.086)
Observations	17,929	17,929	17,929
R-squared	0.131	0.133	0.133
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes
Controls	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A30.** Results of Equations 1-3 with Standard Errors Clustered on Donor × Recipient Country

Outcome: Project Success <sub>t</sub>	(1)	(2)	(3)
ATI Policy <sub>t-1</sub>	0.020 (0.049)		-0.067 (0.050)
Appeals Mechanism <sub>t-1</sub>		0.290** (0.055)	0.320** (0.059)
Observations	17,929	17,929	17,929
R-squared	0.131	0.133	0.133
Recipient Country Fixed Effects	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes
Controls	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor\*recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

## H. Analysis of Recipient Country Context

**Table A31.** Relationship between ATI Policy and Project Success as Moderated by Bottom-Up Accountability and Governance Quality

Outcome: Project Success <sub>t</sub>	(1)	(2)	(3)	(4)
ATI Policy <sub>t-1</sub>	0.033 (0.096)	-0.000 (0.187)	0.015 (0.116)	-0.033 (0.126)
CSO Participatory Environment <sub>t-1</sub>	0.036 <sup>†</sup> (0.017)			
ATI Policy <sub>t-1</sub> × CSO Participatory Environment <sub>t-1</sub>	-0.011 (0.033)			
Total Press Score <sub>t-1</sub>		-0.003 (0.002)		
ATI Policy <sub>t-1</sub> × Total Press Score <sub>t-1</sub>		0.003 (0.002)		
Control of Corruption <sub>t-1</sub>			-0.188 (0.141)	
ATI Policy <sub>t-1</sub> × Control of Corruption <sub>t-1</sub>			0.047 (0.074)	
Rule of Law <sub>t-1</sub>				-0.071 (0.105)
ATI Policy <sub>t-1</sub> × Rule of Law <sub>t-1</sub>				-0.042 (0.061)
Observations	17,688	10,732	8,022	8,034
R-squared	0.130	0.157	0.175	0.175
Controls	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1



**Table A32.** Relationship between Appeals Mechanism and Project Success as Moderated by Bottom-Up Accountability and Governance Quality

Outcome: Project Success <sub>t</sub>	(1)	(2)	(3)	(4)
Appeals Mechanism <sub>t-1</sub>	0.284** (0.087)	0.134 (0.132)	0.120 (0.078)	0.124 (0.085)
CSO Participatory Environment <sub>t-1</sub>	0.035 (0.020)			
Appeals Mechanism <sub>t-1</sub> × CSO Participatory Environment <sub>t-1</sub>	0.020 (0.041)			
Total Press Score <sub>t-1</sub>		-0.001 (0.002)		
Appeals Mechanism <sub>t-1</sub> × Total Press Score <sub>t-1</sub>		0.003 (0.002)		
Control of Corruption <sub>t-1</sub>			-0.118 (0.113)	
Appeals Mechanism <sub>t-1</sub> × Control of Corruption <sub>t-1</sub>			-0.092 (0.066)	
Rule of Law <sub>t-1</sub>				-0.079 (0.096)
Appeals Mechanism <sub>t-1</sub> × Rule of Law <sub>t-1</sub>				-0.097 (0.067)
Observations	17,688	10,732	8,022	8,034
R-squared	0.132	0.159	0.176	0.176
Controls	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A33.** Relationship between ATI Policy and Project Success as Moderated by Recipient Country ATI Regime

Outcome: Project Success <sub>t</sub>	(1)	(2)
ATI Policy <sub>t-1</sub>	0.025 (0.096)	0.023 (0.096)
Recipient FOI Law <sub>t-1</sub>	-0.009 (0.071)	
ATI Policy <sub>t-1</sub> × Recipient FOI Law <sub>t-1</sub>	-0.058	

	(0.074)	
Recipient FOI Law with Appeals Mechanism <sub>t-1</sub>		-0.058 (0.059)
ATI Policy <sub>t-1</sub> × Recipient FOI Law with Appeals Mechanism <sub>t-1</sub>		-0.037 (0.077)
Observations	17,929	17,929
R-squared	0.131	0.131
Controls	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes
Donor Fixed Effects	Yes	Yes
Year Fixed Effects	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A34.** Relationship between ATI Appeals and Project Success as Moderated by Recipient Country ATI Regime

Outcome: Project Success <sub>t</sub>	(1)	(2)
Appeals Mechanism <sub>t-1</sub>	0.308** (0.085)	0.304** (0.084)
Recipient FOI Law <sub>t-1</sub>	-0.043 (0.066)	
Appeals Mechanism <sub>t-1</sub> × Recipient FOI Law <sub>t-1</sub>	-0.067 (0.053)	
Recipient FOI Law with Appeals Mechanism <sub>t-1</sub>		-0.076 (0.072)
Appeals Mechanism <sub>t-1</sub> × Recipient FOI Law with Appeals Mechanism <sub>t-1</sub>		-0.060 (0.047)
Observations	17,929	17,929
R-squared	0.133	0.133
Controls	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes
Donor Fixed Effects	Yes	Yes
Year Fixed Effects	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

## I. Analysis of Corruption Risks

**Table A35.** Relationship between *Appeals Mechanism* and Project Corruption Risk Indicators

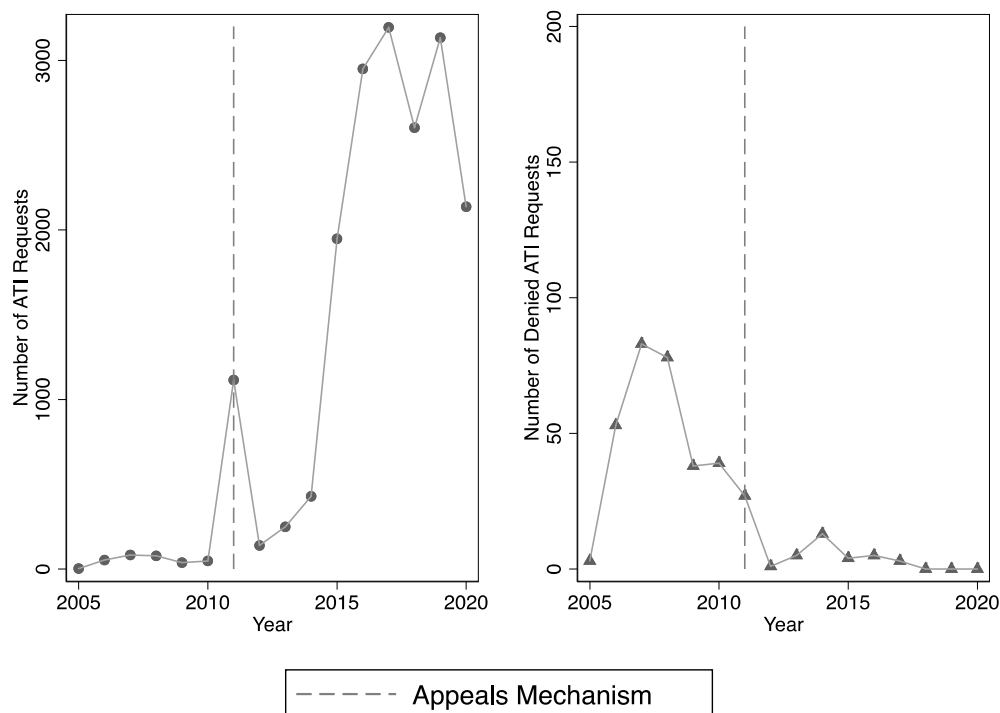
Outcome:	Closed Procedure Risk <sub>t</sub> (1)	Single Bid <sub>t</sub> (2)	Risky Signature Period <sub>t</sub> (3)	Foreign Supplier <sub>t</sub> (4)	Repeat Winner <sub>t</sub> (5)	Consultancy Procurement <sub>t</sub> (6)	Supplier in Tax Haven <sub>t</sub> (7)	Share of Published Contract Awards <sub>t</sub> (8)
Appeals Mechanism <sub>t-1</sub>	0.086 (0.033)	-0.517 <sup>†</sup> (0.068)	0.074 <sup>**</sup> (0.013)	-0.043 <sup>**</sup> (0.012)	-0.065 <sup>**</sup> (0.015)	-0.066 (0.039)	-0.001 (0.002)	-0.041 (0.329)
Observations	701,495	282,649	213,643	213,641	150,889	303,944	303,944	183,926
R-squared	0.177	0.135	0.081	0.134	0.084	0.115	0.010	0.099
Controls	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	No	No	No	No	No	No
Year Fixed Effects	Yes	No	No	No	No	No	No	No
Donors with non-missing outcome	EC, IADB, WB	EC, WB	WB	WB	WB	IADB	IADB	IADB

OLS estimates with robust standard errors, clustered by recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub> and Recipient Aid/GNI<sub>t-1</sub>. Higher values of Foreign Supplier<sub>t</sub> indicate lower risk of corruption. Some indicators in Dávid-Barret and Fazekas's (2020) dataset are excluded due to an insufficient number of observations.

\*\* p<0.01, \* p<0.05, † p<0.1

## J. Additional Information on Volume of Requests and Denials

**Figure A3.** Number of Submitted and Denied ATI Requests, AsDB (2005-2019)



### *Predicting Volume of Requests, Denials, and Appeals*

Tables A36-A40 show that there is little evidence that the volume of ATI requests and denials—as well as the number successful and unsuccessful appeals—are influenced by project success or the characteristics of recipient country context we consider in the article.

**Table A36.** Relationship of Recipient Country Characteristics and Project Success Ratings with Number of ATI Requests Submitted to AsDB and World Bank

<i>Outcome:</i> No. ATI Requests Submitted <sub>t</sub>	(1)	(2)	(3)	(4)	(5)
CSO Participatory Environment <sub>t-1</sub>	0.137 (1.064)				
Total Press Score <sub>t-1</sub>		-0.023 (0.033)			
Control of Corruption <sub>t-1</sub>			2.638 (1.106)		

Rule of Law <sub>t-1</sub>				4.096 (5.339)	
Project Success <sub>t-1</sub>					0.009 (0.074)
Observations	744	878	874	878	56
R-squared	0.460	0.424	0.425	0.427	0.737
Controls	Yes	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>. AsDB and World Bank ATI requests are manually matched to donor-recipient-years in the dataset based on their titles and descriptions.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A37.** Relationship of Recipient Country Characteristics and Project Success Ratings with Proportion of AsDB and World Bank ATI Requests Denied

<i>Outcome:</i> Proportion of ATI Requests Denied <sub>t</sub>	(1)	(2)	(3)	(4)	(5)
CSO Participatory Environment <sub>t-1</sub>	0.038 (0.033)				
Total Press Score <sub>t-1</sub>		-0.003 (0.002)			
Control of Corruption <sub>t-1</sub>			0.019 (0.042)		
Rule of Law <sub>t-1</sub>				0.003 (0.029)	
Project Success <sub>t-1</sub>					N.A.
Observations	186	210	210	210	(insufficient)
R-squared	0.941	0.943	0.942	0.942	
Controls	Yes	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

AsDB and World Bank ATI requests are manually matched to donor-recipient-years in the dataset based on their titles and descriptions.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A38.** Relationship of Recipient Country Characteristics and Project Success Ratings with Number of World Bank ATI Appeals

<i>Outcome: No. of Appeals<sub>t</sub></i>	(1)	(2)	(3)	(4)	(5)
CSO Participatory Environment <sub>t-1</sub>	0.054 (0.043)				
Total Press Score <sub>t-1</sub>		-0.003 (0.002)			
Control of Corruption <sub>t-1</sub>			0.109 (0.067)		
Rule of Law <sub>t-1</sub>				0.024 (0.032)	
Project Success <sub>t-1</sub>					-0.017 (0.020)
Observations	845	939	948	948	287
R-squared	0.196	0.195	0.195	0.194	0.389
Controls	Yes	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

**Table A39.** Relationship of Recipient Country Characteristics and Project Success Ratings with Number of Successful World Bank ATI Appeals

<i>Outcome: No. of Successful Appeals<sub>t</sub></i>	(1)	(2)	(3)	(4)	(5)
CSO Participatory Environment <sub>t-1</sub>	0.012 (0.010)				
Total Press Score <sub>t-1</sub>		-0.000 (0.000)			
Control of Corruption <sub>t-1</sub>			0.004 (0.016)		
Rule of Law <sub>t-1</sub>				-0.000 (0.006)	

Project Success <sub>t-1</sub>					0.002 (0.006)
Observations	845	939	948	948	287
R-squared	0.151	0.149	0.149	0.149	0.325
Controls	Yes	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>. \*\* p<0.01, \* p<0.05, † p<0.1

**Table A40.** Relationship of Recipient Country Characteristics and Project Success Ratings with Number of Unsuccessful World Bank ATI Appeals

<i>Outcome:</i> No. of Unsuccessful Appeals <sub>t</sub>	(1)	(2)	(3)	(4)	(5)
CSO Participatory Environment <sub>t-1</sub>	0.043 (0.035)				
Total Press Score <sub>t-1</sub>		-0.003 (0.002)			
Control of Corruption <sub>t-1</sub>			0.105 <sup>†</sup> (0.056)		
Rule of Law <sub>t-1</sub>				0.024 (0.030)	
Project Success <sub>t-1</sub>					-0.019 (0.017)
Observations	845	939	948	948	287
R-squared	0.200	0.201	0.202	0.199	0.377
Controls	Yes	Yes	Yes	Yes	Yes
Recipient Country Fixed Effects	Yes	Yes	Yes	Yes	Yes
Donor Fixed Effects	Yes	Yes	Yes	Yes	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes

*Notes:* OLS estimates with robust standard errors, clustered by donor and recipient country, in parentheses. Controls are Recipient GDP per Capita Growth<sub>t-1</sub>, Recipient Log GDP per Capita<sub>t-1</sub>, and Recipient Aid/GNI<sub>t-1</sub>.

\*\* p<0.01, \* p<0.05, † p<0.1

## K. Interview Methods

In keeping with best practice (Bleich and Pekkanen 2013), this appendix provides more detailed information on the interviews referenced in the article.

We conducted three elite interviews for this research project: two with World Bank officials involved in handling the appeal made by the civic activist from Bartın, which concerned the Turkey Emergency Flood and Earthquake Recovery Project (1998-2003); and one with Keith Stone Greaves, a journalist and talk show host based in Anguilla.

The interviews were conducted in March and April 2019. At the time, we had some preliminary statistical results and sought to gain a deeper insight into the lived reality of officials handling ATI requests and appeals and the motivation of requesters. To identify potential officials to interview, we began with a search of the World Bank's online archive of appeals.<sup>4</sup> We wished to find a case that was (1) reasonably representative of the sample as a whole and (2) not among the earliest (which could be atypical for various reasons). Based on these criteria—as well as personal connections one of the authors, Dan Honig, had with donor offices in Turkey—we chose to explore the Bartın case (no. AI1362; this was the 19<sup>th</sup> appeal filed).<sup>5</sup> Honig then reached out to his contacts to ask which officials were involved in handling the appeal. After identifying two such individuals, we sent them email requests for interviews, which they both accepted.<sup>6</sup>

As ATI requesters are guaranteed confidentiality and the activist from Bartın had not voluntarily identified themselves, we had to look elsewhere for potential interviewees from this group. Some investigating led us to *WhatDoTheyKnow*, a popular online public repository of British FOI requests and their outcomes, which gives requesters the option of disclosing their identity.<sup>7</sup> We searched the repository for requests submitted to the United Kingdom's aid agency—the Department for International Development (DFID)—that identified the submitter by name and location. The first to come up was that of Keith Stone Greaves, who in his request regarding project tender documents associated with two Anguillan bank audits noted that he was a journalist and broadcaster at *Radio Anguilla*. To interview Mr. Greaves, Honig simply called the radio station and spoke to him. In an effort to better understand the case, we subsequently conducted further research on how tender-

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<sup>4</sup> <https://www.worldbank.org/en/access-to-information/aicdecisions>.

<sup>5</sup> The Bartın activist's initial ATI request is World Bank Access to Information Request AI1362. The two World Bank Access to Information Committee and Access to Information Appeals Board denials can be found at <http://pubdocs.worldbank.org/en/735201433885011928/19-AIC-appeal-19-Case-AI1362.pdf> and <http://pubdocs.worldbank.org/en/295211433883917207/2-CaseAI1362AIAppealsBoardDecision.pdf>.

<sup>6</sup> With respect to issues of positionality, Honig had never interacted directly with the World Bank's Ankara office and was not in any position of authority relative to either interviewee.

<sup>7</sup> <https://www.whatdotheyknow.com/>.



related requests were dealt with by DFID, discovering that Mr. Greaves' appeal set a precedent for automatic disclosure in response to such requests, as we note in the article.<sup>8</sup>

In all three interviews, Honig began by briefly explaining the research project and providing some background on the authors, explaining that participation was entirely voluntary, and making clear that it was possible information disclosed might be included in an academic publication. Honig then asked interviewees to discuss their experience with the ATI request and appeal in question. Interviewees were offered the option of anonymity, which the World Bank interviewees exercised.

Honig took written notes during the interviews, each of which lasted approximately 30 minutes. In one case, Honig followed up with the interviewee via email at a later date to clarify a particular point.

Finally, while the three interviews are representative of our sample in the (trivial) sense that they constitute its entirety, we acknowledge that the experiences they capture may not be shared across all ATI requests and appeals. We include the interviews in an illustrative rather than a hypothesis-testing capacity, with the aim of helping readers better understand the context of ATI requests and their potential impact on project staff.

## References

Aronow, Peter M., and Cyrus Samii. 2016. "Does Regression Produce Representative Estimates of Causal Effects?" *American Journal of Political Science* 60 (1): 250-267.

Bleich, Erik. and Pekkanen, Robert., 2013. "How to Report Interview Data." In *Interview Research in Political Science*, ed. Layna Mosley. Ithaca, NY: Cornell University Press, 84-105.

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<sup>8</sup> The appeal that led to the precedent is helpfully summarized by a commercial law firm at the following link: <https://www.lexology.com/library/detail.aspx?g=ebd386ea-c3dc-4d87-9bed-72561d125903>.