



**International Foundation  
for Electoral Systems**

**INTERNATIONAL FOUNDATION FOR ELECTORAL  
SYSTEMS (IFES)**

**REQUEST FOR APPLICATIONS (RFA) FOR  
MAPPING ILLICIT FINANCIAL FLOWS IN ELECTIONS IN  
MONTENEGRO**

**RFA-24-006**

**January 18, 2024**

## 1. Request for Application (RFA)

### 1.1. Purpose

The purpose of this Request for Applications (RFA) is to invite civil society organization(s) to submit applications to implement a project that will contribute to enhancing data collection and analysis as well as response mechanisms to illicit financial flows (IFF) in Montenegro's electoral process. The objective of this project is to develop and pilot a new mapping methodology for tracking IFF entry points, identifying and addressing risks of foreign influence through deployment of a multi-stakeholder approach. The RFA provides prospective organizations with the relevant operational and performance requirements. The total value of this RFA shall not exceed USD 20,000.

### 1.2. RFA Schedule

IFES will conduct a competitive process to identify grantees per the tentative timeline below:

Issuance of RFA	January 18, 2024
Questions Due	January 24, 2024; by 17:00
Response from IFES	January 26, 2024
RFA Closes—All Applications Due	February 5; by 17:00
Anticipated Implementation Period	March 1 – December 31, 2024

## 2. General Information

### 2.1. Background

IFES is an independent, non-governmental organization providing professional support to electoral democracy. IFES supports citizens' rights to participate in free and fair elections. Our independent expertise strengthens electoral systems and builds local capacity to deliver sustainable solutions.

As the global leader in democracy promotion, we advance good governance and democratic rights by Providing technical assistance to election officials, Empowering the underrepresented to participate in electoral and political processes, and Applying field-based research to improve the electoral cycle.

Since 1987, IFES has worked in over 145 countries – from developing democracies, to mature democracies.

## 3. Application Preparation Instructions

### 3.1. Applicant's Understanding of the RFA

In responding to this RFA, the applicant accepts full responsibility to understand the RFA in its entirety, and in detail, including making any inquiries to IFES as necessary to gain such understanding. IFES reserves the right to disqualify any applicant who demonstrates less than such understanding. Further, IFES reserves the right to determine, at its sole discretion, whether the applicant has demonstrated such understanding. Such disqualification and/or cancellation shall be at no fault, cost, or liability whatsoever to IFES.

### 3.2. Good Faith Statement

All information provided by IFES in this RFA is offered in good faith. Individual items are subject to change at any time. IFES makes no certification that any item is without error. IFES is not responsible or liable for any use of the information or for any claims asserted there from.

### 3.3. Communication

Verbal communication shall not be effective unless formally confirmed in writing by the IFES officials identified in Section 3.5 of this RFA. In no case shall verbal communication

govern over written communication.

### 3.3.1. Applicant Inquiries

Inquiries, questions, and requests for clarification related to this RFA should be submitted in writing to the representative listed below by the deadline listed in 1.2. RFA Schedule.

**Name: Ragheed Al Ameen**  
[ralameen@ifes.org](mailto:ralameen@ifes.org)

**and**

**Name: Gabriella Memarian**  
[gmemarian@ifes.org](mailto:gmemarian@ifes.org)

3.3.2 Formal Communications shall include, but are not limited to:

- Questions concerning this RFA
- Expressions of Interest
- Pre-award negotiations under this RFA
- Addenda to this RFA

### 3.3.3 Addenda

IFES will make a good-faith effort to provide written responses to the questions or requests for clarifications that require addenda by the date set in the RFA Schedule above. All questions, answers, and addenda will be shared with all interested organizations.

## 3.4. Eligibility

Locally registered Disabled Persons Organizations (DPOs), Civil Society Organizations (CSOs) and Non-Governmental Organizations (NGOs) are invited to apply.

Individuals and the following organizations are **not eligible** to access funding:

- Governmental and semi-governmental institutions
- International organizations
- Political parties or organizations affiliated with or engaging in partisan activities
- Organizations running on a for-profit basis

## 3.5. Application Instructions

All applications should include the following, in order for their application to be considered:

### 3.5.1. Technical Application

The Technical Application must include a written application in English describing in detail the applicant's (a) Technical Approach, (b) implementation timeline, and (c) results framework to implement the Program Description as described in Article 4 of this RFA. The evaluation criteria can be found in Article 3.6. Applicants should use the technical narrative template in Attachment A.

### 3.5.2. Cost Application – Budget & Budget Narrative

- The Budget should reflect costs associated with the technical activities and deliverables. All applicants must use the budget template provided in Attachment B and submit it in Excel format as part of their application. The Budget should be presented in **USD**, with applicable taxes/charges clearly identified. Unit costs are required and, in the case of discrepancies between unit costs and total costs, the unit cost will be taken as the reference basis in the evaluation.
- The applicant must agree to keep these costs valid for a minimum of 90 calendar days.
- The Cost Application should include a Budget Narrative that describes each cost element of the Budget (see column H of Attachment B).

### 3.5.3. A brief outline of the applicant's organization and experience.

Organizations should demonstrate prior experience working on public and/or political

finance monitoring, election process strengthening, anti-corruption and institutional oversight, and/or anti-money laundering programs.

#### **3.5.4. Additional documentation**

- When available, a copy of the organization's most recent final, signed audits/financial statements.
- Proof of organization's registration or a signed letter indicating why the organization is not registered.
- CVs of key personnel including the organization's Director and anticipated program manager.
- Any other supporting document that will strengthen the application.

#### **3.6. Application Submission**

Applicants must send final applications in electronic copy via e-mail to the point of contact identified in 3.3.1 on or prior to the closing date and time shown in the *Schedule of Events*.

#### **3.7. Criteria for Selection**

The evaluation of each response to this RFA will be based on its demonstrated competence, compliance, format, and organization. The purpose of this RFA is to identify those organizations that have the interest, capability, and financial strength to implement the project as described in Article 4 of this RFA.

##### **1. Technical Approach, Implementation Timeline, Results Framework (40 points)**

- Demonstrated understanding of the RFA and of IFES's requirements
- Soundness and feasibility of technical approach
- Innovative technical approach with creative and experimental suggestions
- Reasonable implementation timeline and results framework

##### **2. Competitive Budget with efficient and reasonable cost structure (30 points)**

- Cost realism in response to RFA requirements
- Clear budget presentation of necessary, allocable and reasonable costs
- Appropriate balance of budget between operational/personnel costs and activity costs

##### **3. Past Performance and Organizational Capacity (30 points)**

- Demonstrated capacity to organize, manage, and implement full range of activities required to achieve program goals and objectives
- Demonstrated flexibility to adjust implementation in response to changing environments
- Demonstrated strong past performance in implementing programs of similar size, scope, and complexity
- Demonstrated presence and/or networks in the proposed target districts

#### **3.8. Selection and Notification**

Applicants determined by IFES that possess the capacity to compete for this project will be selected to move into the negotiation phase of this process. Written notification will be sent to these applicants via e-mail. Those applicants not selected for the negotiation phase will also be notified.

#### 4. Scope of Work

Over the years, the international community has repeatedly called on relevant institutions in Montenegro to address pending OSCE/ODIHR recommendations concerning key electoral process vulnerabilities. Considering numerous challenges which have profoundly marked and brought into question the legitimacy of previous electoral processes, the integrity of political and campaign finance has long been viewed as central to ensuring both institutional protection of the integrity and equality of political actors in elections. Recent allegations of illicit financing in politics, particularly during the 2020 and 2023 election periods, have further strained the resilience of Montenegro's electoral process to foreign and domestic IFFs.

IFES invites organizations in Montenegro to submit proposals for project activities designed to formulate effective programming to track, analyze, and combat the effects of IFFs in elections, in view of ensuring and advocating for effective campaign finance oversight and enforcement. IFES intends to support project activities that strengthen civil society methodologies to understand and address transnational corruption and illicit financing that manifests through election spending and political financing.

Leveraging available tools, primarily IFES's ["Vote for Free, a Global Guide for Citizen Monitoring of Campaign Finance"](#) and IFF Mapping Tool for Civil Society, IFES will assist the awarded organization to develop a new and innovative methodology for monitoring the flow of money in Montenegro's political process, including in detecting IFFs in elections. Relying on a well-informed, evidence-based, and "follow the money" approaches and identification of institutional partnerships viable for overcoming legal and practical obstacles, the methodology should be tailored to address specific challenges of Montenegro's political finance regime.

The project should emphasize documented evidence that IFFs were predominantly deployed through a variety of domestic and foreign channels, leveraging the fact that the legal framework does not provide adequate mechanisms for effective verification of political contributions and donations and, despite prohibitions, lacks sanctions for third-party campaigning. Under the framework of this project, the awarded organization will also be expected to invest in research-based and multi-stakeholder advocacy efforts and reform initiatives to counter foreign financing of elections.

More specifically, this project activity should achieve the following:

1. Using an evidence-based approach and leveraging IFES's expert support, develop a new, responsive methodology for effective tracking of entry points of and countering IFFs in Montenegro's elections;
2. Strengthen partnerships with relevant stakeholders, primarily the Agency for Prevention of Corruption (APC) and State Audit Institution (SAI), civil society, and media to enable a well-informed approach to IFF prevention and combat during and beyond electoral periods;
3. Establish multi-stakeholder coordination to impart knowledge, exchange information, assess deficiencies, and strengthen coordination in view of more calibrated responses to address detected cases of IFFs in elections;
4. Leverage IFES's expertise and network to advance skills in financial analysis, investigative techniques, and open-source data collection and analysis.

## Description of Activities:

Applicants will provide a detailed description of activities in the submitted Technical Application. The final description of anticipated activities will be decided in consultation with IFES. The initial implementation of project activities will coincide with the delivery of an IFF mapping and knowledge-building session with IFES experts. An illustrative list of activities is provided below but is by no means an exhaustive list.

- Conduct in-depth analysis of the legal framework to identify key deficiencies concerning illicit financing of politics and election campaigns, as well as institutional responses, to assess actions against IFFs in politics and elections in recent years;
- Understand general IFFs risks in Montenegro, including existing gaps in the Financial Action Task Force (FATF)/Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) evaluations;
- Map specific IFF entry points and vulnerabilities in the electoral process, including non-cash transactions, third-party campaigning, transnational organized crime networks, cross-border financial flows, and online advertising;
- Explore the role domestic enablers, such as accountants, lawyers, and real estate agents, play in the exchange of IFFs in politics and elections;
- Access and analyze data included in international and national open-source databases to collect relevant information, including beneficial ownership, asset disclosure, and politically-exposed persons (PEP) data;
- Utilize IFES's tools and expert support to aid development of an IFF tracking methodology in line with identified challenges and peculiarities of Montenegro's context;
- Identify and establish key partnerships with relevant institutions and investigative journalists to enable effective implementation of the developed methodology, strengthening proactive coordination and sanctioning of actors responsible for IFFs;
- Leverage multi-stakeholder network to provide timely information on detected IFFs, alert competent institutions, and hold malign actors accountable;
- Organize technical events to inform optimization and deployment of the developed methodology, impart knowledge on financial analysis and investigation, and discuss how the latter can be adapted for investigative journalists' use;
- Leverage networks to build collective advocacy for amendments of the electoral law, with emphasis but not limited to pending OSCE/ODIHR recommendations concerning political and campaign finance, and inform the general public on achieved results.

**Note:** All applicants are obliged to include an overview of measures to be undertaken with aim to ensure high quality, timely completion and sustainability of project results and activities. In addition, the applicants are required to briefly describe their monitoring, evaluation, and learning (MEL) plan and related indicators. The proposed progress indicators proposed should be relevant, measurable, achievable and time-bound.

All activities must be completed within the established timeline. To ensure timely and high-quality project implementation, the awarded organization undertakes to attend bi-weekly coordination meetings with a designated IFES representative, provide accurate information on project progress, and request IFES expert guidance when needed. At the of the project, the awarded organization is expected to prepare a brief report evaluating their project experience, lessons learned, and recommendations for future activities and initiatives.

IFES encourages unique, innovative technical approaches to activities proposed, as noted in 3.7.

### **Anticipated Results:**

- The awarded organization develops and implements a new mapping methodology complementing institutional campaign finance oversight and detecting IFFs in politics and elections;
- Established partnerships with APC, SAI, civil society, and investigative journalists to allow for continuous optimization of the methodology, leading to implementation of new approaches and timely responses to detected IFFs;
- Organized technical events serve as a platform for knowledge and information-sharing as the basis for efficient advocacy for legal amendments and effective enforcement concerning political and campaign finance;
- Leveraging IFES's peer network, the awarded organization imparts acquired knowledge and skills to help adapt the IFF methodology for use by investigative journalists;
- Strengthened campaign finance oversight, with emphasis on third-party campaigning and in-kind donations, contributes to fair and transparent organization of elections in Montenegro.

### **Anticipated Milestones:**

The accomplishment of each objective will be based on the completion of tasks/deliverables defined in the proposal. Illustrative deliverables include, but are not limited to:

- Developed mapping and analysis methodology;
- Research and analysis documentation;
- Published reports, articles, videos, informative materials, and social media posts;
- Press releases, announcements, meeting minutes, and media articles;
- Technical event workshop reports and photos;
- Memorandum of Cooperation or other coordination mechanisms to alert stakeholders of detected IFFs and proposed enforcement actions.

## **5. Functional Requirements**

### **5.1. Timeline:**

Applicants must submit a detailed timeline in their Application showing the time required to implement the services requested. IFES requires all deliverables to be completed not later than December 31, 2024.

### **5.2. Monitoring & Evaluation**

- As part of its due diligence, IFES conducts pre-award surveys on all potential grantees to assess capacity and inform the appropriate grant mechanism. In addition, applicants expected to expend \$750,000 or more in U.S. funded awards during their fiscal year must have an audit conducted in accordance with 2 CFR Part 200, Subpart F—Audit Requirements. If Applicable, applicants must ensure that funds are included in the grant budget for an audit.
- IFES will issue the appropriate grant mechanism depending on the nature of the work, the capacity of the grantee, the duration of the grant, and the overall value of the grant.

- IFES will provide continuous mentorship, training and oversight to ensure grant management practices are in line with anti-corruption principles as well as to build capacity of local grantees to fully manage and implement their programs in adherence to donor regulations and with a view towards sustainability.

### **5.3. Deliverables:**

Specific deliverables and reporting will be determined based on the grant activities proposed and negotiated during the negotiation phase.

## **6. Additional Terms & Conditions**

### **6.1. Non-Disclosure Agreement**

IFES reserves the right to require any applicant to enter into a non-disclosure agreement.

### **6.2. Zero Tolerance for Fraud**

IFES has zero tolerance for fraud. Fraud is any act or omission that intentionally misleads, or attempts to mislead, to obtain a benefit or to avoid an obligation. If you have concerns about potential fraud in any way related to IFES projects, contracts, or activities, please contact IFES' Compliance Hotline at [compliance@ifes.org](mailto:compliance@ifes.org) or at +1 202-350-6791.

### **6.3. Intellectual Property**

Applicants should not use any intellectual property of IFES including, but not limited to, all logos, registered trademarks, or trade names of IFES, at any time, without the prior written approval of IFES, as appropriate.

### **6.4. Applications**

All accepted applications shall become the property of IFES and will not be returned.

### **6.5. Governing Law**

This RFA and the applicants' applications shall be governed by the laws of the Commonwealth of Virginia, USA.

### **6.6. Partial Awarding**

IFES reserves the right to accept all or part of the application when awarding the grant. IFES also reserves the right to issue multiple awards and procure only items or services from selected applicants.

### **6.7. No Liability**

Issuance of this RFA does not constitute a commitment on the part of IFES to make an award nor does it commit IFES to pay for costs incurred in the preparation and submission of any application in response to this RFA. Further, IFES reserves the right to reject any or all applications received or stop solicitation process at any time, without assigning any reason or liability.

IFES shall not be liable to any applicant, person, or entity for any losses, expenses, costs, claims, or damages of any kind:

- Arising out of, by reason of, or attributable to, the applicant responding to this RFA; or
- As a result of the use of any information, error, or omission contained in this RFA document or provided during the RFA process.

### **6.8. Entire RFA**

This RFA, any addenda to it, and any attached schedules, constitute the entire RFA.

### **6.9. Attachments**

Attachment A: Technical Narrative Template

Attachment B: Budget Template

Attachment C: Organizational Capacity and Past Performance Template

**End of RFA**



**ATTACHMENT A  
TECHNICAL NARRATIVE TEMPLATE**

**I. General Information**

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Complete Legal Name of Applicant Organization

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Office Address

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Legal Mailing Address (if different)

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Office Telephone Number(s)

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E-Mail Address(es)

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Director of Organization

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Project Manager/Contact Person

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Project Dates (month/year – month/year)

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Project Title

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Unique Entity Identifier (UEI)

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PAN Number

**II. Technical Approach:**

*Please include the following components in in a maximum of 5 pages*

- A. Project Summary:** describe your project in one paragraph, including objectives, issue, target audience, and geographic coverage.
- B. Need for the project:** identify the problem your project would help to solve. Why is this project important?
- C. Project’s Goal and Objectives:** what is the specific goal of your effort? Does it comply with the goals and objectives of the competition?
- D. Target Audience and Stakeholders:** what is your main target audience? What groups of stakeholders will the project primarily serve?
- E. Activities:** identify and describe in detail each activity to be undertaken to produce results, justifying the choice of activities.
- F. Expected Deliverables:** identify specific deliverables that you expect to develop within your project (research/analytical reports; specific strategies; public policy recommendations; etc.).

**III. Implementation Timeline**

*Please use the following format to provide an implementation timeline*

Project Month	Activity	Expected Result	Involved Stakeholders

**IV. Results Framework**

*Please identify specific results that you expect to realize upon completion of your project and the quantitative and qualitative criteria for the project’s success. How will you determine that the project goals have been accomplished? The framework should include:*

- A list of results you expect to accomplish throughout the project
- 1-4 performance indicators for each result including a detailed definition for each
- The source, method, frequency and schedule of data collection,
- Staff responsible for collecting data.
- How the performance data will be collected
- How data will be reviewed, analyzed and reported

**ATTACHMENT B**  
**Budget Template**

[CLICK HERE](#) to visit IFES Procurement Notices page and download the budget template.

**ATTACHMENT C**  
**Organizational Capacity and Past Performance Template**

**I. Summary**

*Briefly present your organization’s mission, its core activities, and why it is best suited for this project*

**II. Human Resources**

- A. *Please provide full legal name of organization’s Director and / or Chief Executive Officer.*
- B. *Please provide CVs for the core technical members of the team (the director of the organization, training or curriculum experts, project manager etc.).*
- C. *Please provide hiring plan for full and part-time positions the organization including a list of positions and recruitment plan or cost-share with existing positions.*

**III. Past Performance**

- A. *Briefly describe how your organization’s previous experience prepares it to successfully implement the proposed project; highlight the organization’s relationship and work experience with lawmakers, political parties or government officials if applicable.*
- B. *Please specify previous work in the relevant field.*
- C. *Please list the organization’s major projects from the past five years in the following format:*

<i>Project Name</i>	<i>Project Activities</i>	<i>Donor</i>	<i>Award Amount</i>	<i>Period of Award</i>

**IV. References:**

*If applicable, contact information for three references from donor funded projects similar in scope.*