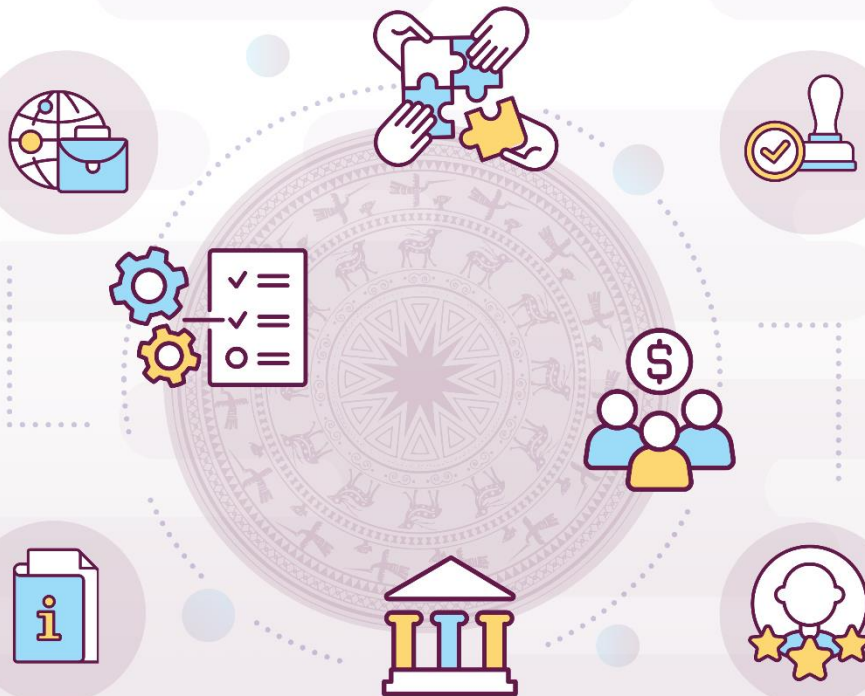


Governance and Participation

A Series of Policy Discussion Papers

LOCAL BUDGET DISCLOSURE IN THE CONTEXT OF ADMINISTRATIVE BOUNDARY REARRANGEMENT IN 2025

A CASE STUDY OF BUDGET DISCLOSURE IN
LANG SON PROVINCE, DIEN BIEN PROVINCE AND HO CHI MINH CITY



October 2025



Governance and Participation


A Series of Policy Discussion Papers

LOCAL BUDGET DISCLOSURE IN THE CONTEXT OF ADMINISTRATIVE BOUNDARY REARRANGEMENT IN 2025

**A CASE STUDY OF BUDGET DISCLOSURE IN
LANG SON PROVINCE, DIEN BIEN PROVINCE AND HO CHI MINH CITY**

[Unofficial translation]

October 2025



The series of Governance and Participation Policy Discussion Papers is commissioned by the Governance and Participation Team at the United Nations Development Programme (UNDP) in Viet Nam. The series analyses trends in Viet Nam's public administration reform implementation and policy options. To confront the social, economic, political, and environmental challenges facing Vietnam, policymakers need to adopt evidence-based decision-making. These policy papers aim to contribute to the current policy debate by providing discussion inputs on policy reforms, thereby helping to improve Vietnam's development efforts.

Three principles guide the production of the policy discussion papers: (i) evidence-based research, (ii) academic rigour and independence of analysis, and (iii) social legitimacy and a participatory process. This involves a substantive research approach with a rigorous and systematic identification of policy options on key governance, public administration reform, and anti-corruption issues.

Citation: Vietnam Center for Strategic Economic Studies (VESS), Center for Development and Integration Social Enterprise (CDISE); and United Nations Development Programme (UNDP) (2025). **Local budget disclosure in the context of administrative boundary reorganization in 2025: A case study of budget disclosure in Lang Son province, Dien Bien province and Ho Chi Minh city.** A Joint Policy Research Paper on Governance and Participation commissioned VESS, CDISE, and UNDP in 2025. Hanoi, Vietnam: October 2025.

All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording, or otherwise, without prior permission.

Disclaimer: The views expressed in this policy research paper do not necessarily reflect the United Nations Development Programme (UNDP) position.



**Viet Nam Center for
Economic and Strategic Studies**

7th Floor, TMC Building,
No. 1 Luong Yen,
Hai Ba Trung Ward, Hanoi
T: (+84) 97 560 8677
E: info@vess.org.vn
W: vess.org.vn



**Center for Development and
Integration Social Enterprise**

No. 3/29/1099 Bat Khoi Street,
Village 4, Bat Trang Commune,
Hanoi
T: (+84) 91 216 5677



UNDP VIETNAM

304 Kim Ma, Ngoc Ha Ward,
Hanoi
T: (+84) 4 38500 100
F: (+84) 4 3726 5520
E: registry.vn@undp.org
W: undp.org/vietnam

ABOUT RESEARCH ORGANIZATIONS

VIETNAM CENTER FOR ECONOMIC AND STRATEGIC STUDIES (VESS) was established in September 2020. VESS has legal status, registered as a non-profit social enterprise under Vietnamese law, headquartered at 7th Floor, Thang Long Metal Building, No. 1 Luong Yen, Hai Ba Trung District, Hanoi. As an independent, not-for-profit research center, VESS's goal is to conduct economic and strategic analysis to help policy makers, businesses, international organizations and interest groups improve the quality of decisions, based on an understanding of the nature of economic movements and international relations.

CENTER FOR DEVELOPMENT AND INTEGRATION SOCIAL ENTERPRISE (CDISE) was established in July 2023. CDISE has legal status, registered as a non-profit social enterprise under Vietnamese law, headquartered at 3/29/1099 Bat Khoi Street, Village 4, Dong Du Commune, Gia Lam District, Hanoi City, Vietnam. CDISE conducts research, builds capacity, and participates in policy making to promote openness, transparency, accountability of state agencies, and citizen participation in the budget process in Vietnam.

AUTHORS

Assoc. Prof. Dr. Nguyen Duc Thanh (Leader of research group): Received a PhD in Development Economics from Japan's National Graduate Institute for Policy Studies (GRIPS); expert in macroeconomics; Founder of the Vietnam Center for Economic and Strategic Studies (VESS).

MPP. Pham Van Long: Received Master's degree in Public Policy from Fulbright University Vietnam; Director of the Vietnam Center for Economic and Strategic Studies (VESS).

MA. Nguyen Quang Thuong: Received Master's degree in Agricultural Economics from Vietnam National University of Agriculture; Director of the Center for Development and Integration Social Enterprise (CDISE).

MA. Do Thanh Huyen: Received a Master's degree in Development Studies from the University of Auckland, New Zealand; Policy Analyst and Programme Manager at UNDP in Vietnam.

ACKNOWLEDGEMENTS

The study **"Local budget disclosure in the context of administrative boundary reorganization in 2025: A case study of budget disclosure in Lang Son province, Dien Bien province and Ho Chi Minh city"** conducted by the Vietnam Center for Economic and Strategic Studies (VESS) in collaboration with the Center for Development and Integration Social Enterprise (CDISE) has been completed with the help and support of individuals and organizations.

We sincerely acknowledge and respectfully thank the leaders and officers of the People's Committees, Departments of Finance of Lang Son, Dien Bien and Ho Chi Minh City (HCMC), People's Committees of Dong Kinh ward, Luong Van Tri ward, Chi Lang commune,

Van Linh commune (Lang Son province), Dien Bien Phu ward, Muong Thanh ward, Muong Ang commune, Na Tau commune (Dien Bien province), Sai Gon ward, Tan Dinh ward, Binh Duong ward, Chanh Hiep ward, Vung Tau ward and Tam Thang ward (HCMC) for taking the time to participate in the survey.

We would like to express our sincere appreciation to the United Nations Development Programme (UNDP) in Vietnam for accompanying and supporting the research team members while conducting the report and publishing the results.

The research team members include Assoc. Prof. Dr. Nguyen Duc Thanh (Team Leader), MPP. Pham Van Long, MSc. Nguyen Quang Thuong and MSc. Do Thanh Huyen. Supporting members include Hoang Long, Phung Phuong Anh (VESS Project Officer), MSc. Le Thi Minh Hien (VESS Communications Officer), MSc. Le Ut Tinh (CDISE Project Officer), MSc. Truong Duc Thang (Governance & Participation Analyst, UNDP in Vietnam), Nguyen Khanh Linh (Finance Officer, UNDP in Vietnam) and Tran Thi Van Anh (Communication Officer, UNDP in Vietnam). Surveyors include MPP. Ha Thi Diu, Doan Phuong Thanh, Dinh Quynh Trang (VESS). The dedication and enthusiasm of the members made a significant contribution to the successful completion of this report.

The collective efforts of experts and colleagues, together with the enthusiastic cooperation of localities, have helped us complete this report. However, the report may still contain limitations and shortcomings. The authors sincerely welcome feedback and suggestions from readers to help improve future research efforts.

TABLE OF CONTENTS

ACKNOWLEDGEMENTS	iii
EXECUTIVE SUMMARY	vi
CHAPTER I. INTRODUCTION	1
1. Research context.....	1
2. Research questions.....	2
3. Research methods	2
CHAPTER II. POTENTIAL POLICY AND PRACTICE GAPS AFFECTING CITIZEN PARTICIPATION IN THE STATE BUDGET PROCESS IN THE CONTEXT OF LOCAL GOVERNMENT RESTRUCTURING.....	4
1. Institutional gap: A lack of regulations and guidance on direct citizen participation in the budget process.....	4
2. Information gap: The level of budget disclosure and transparency remains low across most budget levels, limiting public access	6
CHAPTER III. STATUS OF WEB PORTAL LINKAGE BETWEEN PEOPLE'S COMMITTEES AT ALL LEVELS ACROSS 63 PROVINCES BEFORE THE MERGER.....	10
1. Overview of web portal linkage between provincial, district and commune levels.....	10
2. Statistics on web portal linkage between provincial, district and commune levels.....	12
3. Status of state budget disclosure on commune-level web portals	16
CHAPTER IV. LOCAL BUDGET DISCLOSURE IN THE CONTEXT OF ADMINISTRATIVE BOUNDARY REORGANIZATION UNDER THE TWO-TIER LOCAL GOVERNMENT MODEL	18
1. Status of Budget Disclosure in the Surveyed Localities	18
2. Challenges in disclosing budgets during the reorganization of administrative units.....	20
CHAPTER V. CONCLUSIONS AND RECOMMENDATIONS.....	33
1. Conclusions	33
2. Recommendations	35
3. Further discussion.....	37
References	39

LIST OF FIGURES

Figure 1: Percentage of communes with web portals at the time of review (May 2025)	12
Figure 2: Percentage of District People's Committee web portals linked from Provincial People's Committee web portals	13
Figure 3: Web page linkage data between Province-Commune and District-Commune.....	13
Figure 4: Statistics by province for percentage of commune web portals directly linked from provincial People's Committee web portals	14
Figure 5: Statistics on the number of communes that have publicly disclosed at least one most recent budget document by fiscal year at the time of review (May 2025). 16	
Figure 6: Correlation between number of communes with budget disclosure directories and number of communes with budget disclosure documents (by provinces).....	17

LIST OF TABLES

Table 1: Types of Website Link Display	11
Table 2: Statistics of inter-government web portal linkage and state budget disclosure.....	14
Table 3: Handover of documents between units during the merger in Lang Son Province, Dien Bien Province, and Ho Chi Minh City: Views from local officials	22
Table 4: Number of civil servants responsible for finance and budget in the Division of Economic Affairs or the Division of Economic Affairs, Infrastructure and Urban Affairs of the surveyed wards and communes	27

EXECUTIVE SUMMARY

COUNTRY CONTEXT

Since 1 July 2025, Viet Nam has officially implemented a two-tier local government model, replacing the previous three-tier structure. As part of the historic local government restructuring, district-level administrative units were dissolved. As a result, the administrative as well as budgetary management functions previously assigned to the district tier have primarily been transferred to the provincial and commune levels. This reform aims to streamline government, reduce fiscal expenditures, and enhance governance efficiency. Nevertheless, it also poses significant challenges to transparency and accountability in budget management, and in particular, to citizens' rights to participate in budget processes.

Against this backdrop, the thematic research study entitled **“Local Budget Disclosure in the Context of Administrative Boundary Rearrangement in 2025: A Case Study of Budget Disclosure in Lang Son Province, Dien Bien Province, and Ho Chi Minh City”** was undertaken. The study aims to examine the status of budget disclosure following the administrative reorganization, to identify discrepancies between policy frameworks and practical implementation, and to propose policy recommendations to ensure that administrative reforms do not exacerbate inequality nor diminish citizen participation and access to budgetary information.

RESEARCH FINDINGS

The research employed a mixed-methods approach, combining a systematic review of relevant laws and policies with online data analysis. From May to June 2025, before the merger and the establishment of the two-tier local government, the team reviewed online budget disclosure practices across all 63 provinces, 696 district-level units (districts, towns, and provincial cities), and all 10,035 commune-level units (communes, wards, and townlets). After the reorganization, the review covered all 34 provinces and all 3,321 commune-level units (communes/wards/special administrative zones). Field surveys were also undertaken in 14 commune-level units in Dien Bien, Lang Son and Ho Chi Minh City after the merger.

The findings demonstrate that the legal framework governing budget disclosure, accountability, and citizen participation in public administration and the budget cycle is relatively comprehensive. The Ministry of Finance, together with several provinces, has undertaken significant efforts to promote budget disclosure at all budget levels. Nevertheless, the divergence between policy provisions and their implementation in practice remains substantial.¹ The 2025 State Budget Law (Law No. 89/2025/QH15), which will enter into force on 1 January 2026, introduces few substantive changes to narrow the gap between policy and practice, a gap that has already been highlighted

¹ See VESS, CDI & UNDP (2023).

in budget disclosure survey reports such as the Viet Nam Provincial Governance and Public Administration Performance Index (PAPI), the Open Budget Index (OBI), the Ministry Open Budget Index (MOBI), and the Provincial Open Budget Index (POBI). Moreover, the adoption of the two-tier local government model has given rise to a new set of challenges for the implementation of budget disclosure and citizen participation in the state budget cycle.

The current status of budget disclosure, the development of electronic web portals for the commune level, and the online disclosure of budget information after the merger remain incomplete and lack synchronization.

Prior to the merger, of more than 10,000 communes, wards, and townlets nationwide, 7,805 units (78 percent) had web portals. However, only 1,856 communes, equivalent to approximately 23.8 percent of communes with web portals, published at least one type of budget document as required by law.² After the reorganization, there are 3,321 commune-level units nationwide, of which 85 percent have web portals. Yet only 11.9 percent of all communes, and 13.9 percent of communes with web portals, disclosed at least one budget document.³ Notably, Ho Chi Minh City, the locality with the largest number of commune-level administrative units nationwide (168 in total), had not yet established portals at the commune level. This indicates that, although the proportion of communes with web portals increased after the merger compared to the pre-merger period, the proportion of communes disclosing budgetary information online has declined. Therefore, significant efforts are required to promote budget disclosure, particularly in the context of the 2025 State Budget Law, which mandates online disclosure for units with web portals.

There was disruption in budget information disclosed on electronic web portals of administrative units undergoing merger and reorganization.

The findings indicate that no clear guidance was issued on the transfer, management, and operation of portals belonging to merged administrative units. Consequently, most of the web portals of units prior to the reorganization have ceased to operate. Citizens and organizations have therefore been unable to access information that had previously been disclosed, including budget information, on the web portals of these units. This not only restricts citizens' access to budgetary information but also results in wasted resources, as digital assets have not been properly transferred or managed.

In addition, citizens' access to budget documents of pre-merger localities relies mainly on printed archives. However, accessing printed documents is also difficult because they have been transferred and archived in accordance with regulations. Citizens must wait until archival authorities have completed verification and digitization before

² The survey was conducted in late May 2025, approximately more than one month prior to the implementation of the two-tier local government model.

³ The survey was conducted in late September 2025, three months after the merger and the implementation of the two-tier local government model.

gaining access, as stipulated in Circular No. 06/2025/TT-BNV, which details certain provisions of the 2024 Law on Archives. Even when budget information has been reviewed, adjusted, and digitized, citizens must still submit applications, await approval, and travel to the archives to consult the data - a process that is cumbersome, time-consuming, and costly.

The State Budget Law and related legal instruments lack specific provisions that permit citizens to directly participate in the budget process.

Neither the 2015 nor the 2025 State Budget Law, together with related regulations, provides explicit mechanisms enabling citizens to directly participate in the budget cycle - including formulation, implementation, and oversight. Current participation is mainly indirect, through the People's Councils, the Viet Nam Fatherland Front, and its member organizations. Consequently, Viet Nam's score on citizen participation in the 2024 Open Budget Survey was only 19 out of 100,⁴ despite some improvements in recent years. Results from the 2024 PAPI Index indicate that the proportion of citizens reporting that they were invited to contribute ideas from the planning stage through to the design of local public works has declined over time.⁵ The provisions on community oversight of the state budget in Article 16 of the 2025 State Budget Law remain unchanged compared with the 2015 Law. This demonstrates that institutional gaps continue to exist in enabling citizens to directly participate in the budget process, and that further provisions are needed to align with both Viet Nam's practical realities and international good practice.

State budget-utilizing units have not complied with the regulations on budget disclosure on their respective electronic portals or web portals.

Article 15 of the 2015 State Budget Law did not impose a requirement to disclose budgets on entities' web portals. However, entities with web portals were required to disclose budgets via their web portals in accordance with Clause 1, Article 51 of Decree No. 163/2016/ND-CP, which sets out details on the implementation of the 2015 State Budget Law.

Survey findings over the years reveal that many budget-using entities failed to comply with these disclosure requirements. In 2021, 50 percent of ministries and central agencies disclosed little budget information.⁶ In 2023, 272 district-level units (38.6 percent) had low levels of disclosure, and 168 district-level units (23.8 percent) did not disclose any budget documents at all.⁷ The level of disclosure continued to remain low in the 2025 round of review, with only 13.9 percent of all communes (post-merger) with web portals disclosed at least one of the required budget documents (as mentioned in the above part). The continued low levels of disclosure highlight the need

⁴ See IBP & CDI (2024).

⁵ See CECODES, RTA & UNDP (2025).

⁶ See VESS & CDI (2022).

⁷ See VESS, CDISE & UNDP (2024).

for stronger law enforcement, clearer guidance, and capacity-building support to ensure that budget transparency commitments translate into actual practice across all levels of government.

There was a lack of sanctions against units that fail to comply, or comply insufficiently, with the regulations on budget disclosure.

The 2015 and 2025 State Budget Laws both stipulate obligations for budget disclosure and community oversight of the state budget. However, they do not prescribe sanctions against entities or their leaders in cases of non-compliance or partial compliance. This absence of enforceable penalties is one of the key reasons why many budget-using entities either fail to disclose, disclose belatedly, or disclose incompletely, as discussed above. In 2024, the State Treasury, under the authorization of the Ministry of Finance, temporarily suspended the budgets of certain units under the former Ministry of Labour, Invalids and Social Affairs (now merged into the Ministry of Home Affairs) due to delays in submitting their 2022 final accounts to the Ministry of Finance. This decision was made under Clause 2, Article 63 of the 2015 State Budget Law, which concerns accounting and finalization of the state budget. Thus, it is entirely feasible to consider extending the scope of this provision to apply to delays in disclosing budget documents.

Detailed instructions for physically posting budget documents at commune People's Committees are missing, pursuant to the 2025 State Budget law, to ensure alignment with spatial changes resulting from the commune-level unit reorganization.

Public posting at the offices of People's Committees is one of the disclosure methods commonly used by commune-level People's Committees. Following the reorganization, the administrative boundaries of communes were significantly expanded, thereby increasing the distance between citizens' residences and commune/ward offices, especially in mountainous communes, compared with before the merger. Therefore, more specific guidance is required concerning the time and location of the public posting of budget documents at commune-level People's Committee offices or village community houses, in order to facilitate easier access to information, particularly for groups without internet access or smart devices.

Furthermore, the content of budget disclosure guided by Circular No. 343/2017/TT-BTC employs specialized technical terminology, which is complex and difficult for citizens to understand. Budget documents need to be simplified into the form of "citizen budget reports" (for example, similar to the citizen budgets previously issued by the Ministry of Finance). In addition, depending on local conditions and ethnic population distributions, budget documents should also be translated into ethnic minority languages, thereby enabling more inclusive access.

There was a lack of guidance for budget disclosure during the transitional phase.

The study further reveals the absence of regulatory guidance during the transitional phase of the reorganization. According to the 2025 Law on Local Government Organization (Law No. 72/2025/QH15) and resolutions of the National Assembly and the Standing Committee of the National Assembly, pre-merger local governments ceased to operate on 1 July 2025, while post-reorganization local governments came into effect on the same date. The six-month budget performance reports for the first half of 2025 in most surveyed communes, and districts were therefore not disclosed before the reorganization. After the merger, there was no clear assignment of responsibility for disclosure due to the absence of transitional provisions.

Commune-level disclosure formats and content post-reorganization remain inadequate.

Commune-level budgetary responsibilities changed substantially after the abolition of district-level administrative units. Communes have since assumed additional powers and functions in fiscal management that were previously under district authority, alongside their existing responsibilities. Nevertheless, many communes continue to implement budget disclosure according to Circular No. 343/2017/TT-BTC, which no longer reflects the expanded scope of their fiscal responsibilities. Consequently, several localities have failed to disclose the full range of budget information mandated under the two-tier government model.

The omission of specific budget disclosure timelines in Article 15 of the 2025 State Budget Law hinders citizens' timely access to information.

The provisions on budget disclosure in the 2025 State Budget Law introduce additional requirements concerning the disclosure of extra-budgetary funds and establish the mandatory obligation to disclose information on the official electronic portals of agencies and units. This demonstrates the continued commitment of the National Assembly, the Government, and the Ministry of Finance to promoting budget transparency in Viet Nam. Alongside this positive development, however, the 2025 State Budget Law no longer provides detailed stipulations on the timelines for disclosing specific budget contents and documents, as these responsibilities have been delegated to the Government for further specification.

In the absence of such detailed regulations, this would constitute a “step backward” in the legal framework for budget disclosure and would also be inconsistent with the provisions on the timing of information disclosure set out in Clause 4, Article 18 of the 2016 Law on Access to Information. This gap creates an opportunity for budget-using entities to evade timely disclosure, thereby restricting citizens' access to budgetary information and limiting their capacity to exercise oversight of the budget as provided by the law.

The arrangement of finance-planning personnel at the commune level following the reorganization affects the execution of budget disclosure responsibilities.

The study highlights significant disparities among the surveyed communes with respect to human resources responsible for financial and planning functions, which are performed by the Economic Division (at the commune level) or by the Division of Infrastructure and Urban Development (at the ward level). Chanh Hiep ward and Binh Duong ward in Ho Chi Minh City had the largest number of specialists and staff in charge of finance and accounting, with five and six persons, respectively. By contrast, Dong Kinh ward and Van Linh commune in Lang Son province each had only one officer responsible for finance and budgeting. The main reason for this situation is that accountants of pre-merger units retired under Decree No. 178/2024/ND-CP, while local authorities were unable to reassign personnel from other localities in accordance with the guidance of the Steering Committee for Administrative Reorganization and the establishment of the two-tier local government model, as stipulated in Official Letter No. 09/CV-BCĐ.

Field survey findings further demonstrate that there are significant disparities in the knowledge, skills, and experience of commune-level financial officers and civil servants. In some localities, such as Tan Dinh ward and Binh Duong ward in Ho Chi Minh City, financial officers were appointed in line with their professional qualifications and competencies, thereby contributing to the effective implementation of budget disclosure at the ward level. However, there are also cases where commune-level budget officers were appointed without relevant expertise or experience, due to understandable reasons such as the retirement of experienced staff. This situation has created considerable difficulties in implementing financial and budgetary functions at the commune level, including budget disclosure, particularly in the context where communes are now delegated and authorized with greater responsibilities in fiscal management under the two-tier local government model.

POLICY RECOMMENDATIONS

The reorganization of administrative units under the two-tier model, as mandated by resolutions of the National Assembly, has created substantial challenges for budget disclosure and for ensuring citizen participation in the budget cycle. To strengthen the implementation of budget disclosure and to enhance citizens' access to budgetary information, this study proposes the following recommendations:

Recommendation to the National Assembly

- The National Assembly should consider piloting institutional mechanisms that enable citizens and organizations to directly participate in budget deliberations during sessions of the National Assembly and People's Councils at provincial and commune levels.

Recommendations to the Government

- The Government should promptly issue a decree and circular providing detailed guidance on state budget disclosure for the effective implementation of the 2025 Law on State Budget Law. Such guidance should reintroduce specific provisions on the timing of disclosure for each type of budget document, as was stipulated under the 2015 State Budget Law. Should detailed timing not be specified, the decree and circular should explicitly state that disclosure timelines shall follow Clause 4, Article 18 of the 2016 Law on Access to Information.
- Sanctions should be introduced for non-compliance with budget disclosure obligations, in line with existing penalties for violations of accounting, reporting, and budget finalization requirements.
- The Government should mandate the Ministry of Home Affairs, in coordination with other relevant ministries, to develop guidance on the management and continued accessibility of information and data previously disclosed on the portals of pre-merger entities, including budgetary information. This would ensure uninterrupted public access to historical budget data and information.
- The Government should conduct assessments of the enforcement of budget disclosure laws and report the findings to the National Assembly, the Standing Committee of the National Assembly, and the State President, in accordance with legal requirements.

Recommendations to the Ministry of Finance

- The Ministry of Finance should promptly issue a Circular guiding budget disclosure under the 2025 State Budget Law (replacing Circulars No. 343/2016/TT-BTC, No. 61/2017/TT-BTC, and No. 90/2018/TT-BTC). The Circular should establish disclosure indicators and templates aligned with the two-tier local government model, while ensuring compatibility with the Treasury and Budget Management Information System (TABMIS).
- Guidance should also be issued for commune-level People's Committees to post budget information both at commune offices and at village community houses. Budget disclosure tables should be displayed at locations frequently accessed by citizens, such as commune-level public service centres and community houses in villages. The Circular should specify both the timeline and duration of such postings.
- The Ministry should further include in its guidance a provision encouraging entities to prepare and disclose "citizen budget reports" and to make use of social media platforms such as Zalo and Facebook for disseminating budgetary information.

Recommendations to the State Treasury

- The State Treasury should support the Ministry of Finance in designing disclosure templates that are compatible with the TABMIS system and allow for efficient extraction of budget data.

- The State Treasury should also ensure that budget-using entities have timely and convenient access to TABMIS, thereby enabling compliance with disclosure requirements.

Recommendations to People's Councils at Provincial and Commune Levels

- People's Councils should strengthen the fulfilment of their obligations and responsibilities as elected bodies. Beyond publishing oversight plans, the results of oversight activities should also be disclosed in a complete and detailed manner. People's Councils should intensify their monitoring of the compliance of agencies and units within their mandate with budget disclosure requirements.
- Deliberations on the implementation and effectiveness of budget disclosure should be systematically incorporated into the regular sessions of People's Councils.

Recommendations to Provincial People's Committees and Departments of Finance

- Provincial People's Committees should direct relevant agencies such as the Departments of Home Affairs, Departments of Finance, and commune-level People's Committees to conduct a comprehensive review of the human resources responsible for financial and planning functions at the commune level. This should ensure that staff are appropriately assigned to positions that match their qualifications and competencies, and that both the number and quality of personnel meet local needs, in line with the guidance of the Steering Committee on Administrative Reorganization and the Establishment of the Two-Tier Local Government Model, as set out in Official Letter No. 09/CV-BCĐ concerning the temporary orientation for personnel allocation (dated 30 May 2025).
- Provincial Departments of Finance should advise Provincial People's Committees to design and implement training and capacity-building programs for commune-level finance officers, with priority given to budget accountants, in line with Conclusion No. 179/KL/TW of the Politburo and Secretariat on strengthening the organization and functioning of the two-tier local government model.
- Adequate resources should be allocated for the development and improvement of electronic portals of provincial and commune-level governments. Depending on local conditions, budget disclosure sections may be placed on the provincial government's portal or on commune-level portals.

Recommendations to the Viet Nam Fatherland Front

- The Viet Nam Fatherland Front should strengthen the fulfilment of its mandate and responsibility to lead social supervision and critique with regard to state budget information. It should provide guidance to, and promote the active involvement of, its member organizations in monitoring the exercise of citizens' rights and obligations concerning the disclosure and transparency of budgetary information by agencies and budget-using entities.

- It is necessary to integrate the content and results of the monitoring of budget disclosure implementation, along with an assessment of the current state of budget disclosure, into consolidated reports on voters' opinions and recommendations submitted to the National Assembly or the People's Councils at provincial and commune levels via the Vietnam Fatherland Front.

Recommendations to the Ministry of Home Affairs

- The Ministry of Home Affairs should work with relevant ministries in developing guiding documents on the management and access to archived information and data, including budgetary information, previously disclosed on the portals of pre-merger entities, to allow efficient and effective use of archived resources.
- The Ministry of Home Affairs should monitor local governments' budget disclosure by integrating this indicator in the Public Administration Reform (PAR) Index.

CHAPTER I. INTRODUCTION

1. Research context

On 1 July 2025, Viet Nam embarked on a major transformation of its local government system, shifting from a three-tier structure (province, district, commune) to a two-tier model (province and commune/ward/special administrative unit under provinces and centrally governed municipalities). This reform reallocates specific powers and responsibilities across levels of local government, including those pertaining to the management, implementation, and disclosure of public budgets. Within this new institutional framework, the commune level assumes an increasingly pivotal role in the delivery of public services, the promotion of grassroots democracy, the enhancement of citizen participation, and the safeguarding of timely and convenient access to information – particularly in relation to budget transparency.

Nonetheless, findings from the Viet Nam Provincial Governance and Public Administration Performance Index (PAPI) over the years show that there is a large gap between what commune governments are expected to provide and what citizens receive in terms of access to information about state budget plans and expenditures at the commune level. On the national average, only 38.61 percent of the citizens confirmed that their communes' budget and expenditure lists were publicized in 2023, the lowest since 2016. Among these, 20.64 percent personally read the lists, and 79.64 percent of those who had read the lists said they trusted the information therein.

The Resolution No. 57-NQ/TW issued by the Politburo on 22 December 2024 on breakthroughs in scientific and technological development, innovation, and national digital transformation, explicitly states that institutions, human resources, infrastructure, data, and strategic technology are core and fundamental components. This highlights the necessity of reforming the provision of public services and the public disclosure of budget information. As 2015 State Budget Law was amended and promulgated at the end of June 2025, to take effect on 1 January 2026, it specifically stipulates that state agencies and units with web portals/portals are required to publicly disclose budget information on their respective web portals/portals. At present, however, there is no regulation mandating that communes/wards/special administrative units must have their own web portals/portals. However, in line with the spirit of Resolution No. 57 and given the increasingly important roles and responsibilities of the commune level after the merger, the application of science and technology and the development of digital infrastructure are inevitable trends in order to facilitate citizens' quick and convenient access to information.

To support the implementation of the 2022 Law on Implementation of Grassroots Democracy, and to promote good practices of budget disclosure in the new context, The Vietnam Center for Economic and Strategic Studies (VESS) was selected and engaged by UNDP Vietnam to conduct the thematic study entitled: **"Local budget**

disclosure in the context of administrative boundary reorganization in 2025: A case study of budget disclosure in Lang Son province, Dien Bien province and Ho Chi Minh city”. This action research aims to identify good practices in budget disclosure, especially as the State Budget Law 2015 was amended in June 2025 and will come into effect on 1 January 2026, with the new regulation on budget disclosure.

This assignment is part of UNDP’s Viet Nam Provincial Governance and Public Administration Performance Index (PAPI) research and advocacy programme, which is co-financed by the Department of Foreign Affairs and Trade (DFAT) of Australia, the Embassy of Ireland in Viet Nam, and UNDP in Viet Nam. The PAPI research programme has grounded its missions on the Ordinance No. 34 on Grassroots Democracy Implementation since its debut in 2009.

The overall aim of PAPI is to improve the quality of government functions, the responsiveness, transparency, and accountability of public institutions, and ensure basic human rights in terms of freedom of expression, access to information, and access to quality services. With evidence collected from citizens as the end-users of government services, not only through PAPI surveys but also thematic research and policy advice like this action research and advisory initiative, PAPI helps identify policy gaps that can inform policy-making agencies and motivate improvement in local government performance.

2. Research questions

This study focuses on addressing the following three main research questions:

1. What are the potential gaps between policy and practice that affect citizen participation in the state budget process in the context of restructuring local government?
2. What is the status of linkages among the official web portals of local authorities at different levels, and to what extent were these web portals used to publish and disclose commune-level budget information prior to consolidation?
3. After consolidation, what is the actual situation regarding the disclosure of local budgets, especially at the commune level, and what are the facilitating factors and challenges in implementation on the ground?

3. Research methods

3.1. Desk research

The research team began by reviewing laws, regulations and policies currently in force related to budget disclosure. Special attention was given to legal instruments concerning the consolidation of provinces and municipalities and the implementation of the two-tier local government model. On that basis, the research team provided assessments and observations on potential gaps between policy and practice affecting citizen participation in the budget cycle in the new context. The findings from

the desk review will also serve as important inputs for the development and design of the survey instruments and in-depth interview guides for the fieldwork.

3.2. Review of linkages among web portals

The research team reviewed all official web portals of the People's Committees of 63 provinces and municipalities and of the web portals of the People's Committees of 10,035 commune-level units as they existed prior to consolidation in order to assess the availability and level of interconnection between provincial-level and commune-level web portals, and concurrently reviewed the status of budget information disclosure on commune-level web portals where available; the review findings serve as an important preliminary indicator to inform recommendations on the application of information technology in budget disclosure as well as on the availability, readiness and responsiveness of local authorities to disclose budget information online in the new context.

3.3. Field surveys

To examine actual practices of budget disclosure as well as the facilitating factors and challenges in disclosing budgets following the consolidation of provinces and municipalities and the implementation of the two-tier local government model, the research team conducted in-depth interviews in Lang Son province, Dien Bien province, and Ho Chi Minh City. Lang Son and Dien Bien are two provinces that did not undergo administrative consolidation, whereas the new Ho Chi Minh City was formed through the merger of three former units: Binh Duong province (old), Ba Ria-Vung Tau province (old), and Ho Chi Minh city (old). At these localities, the research team also met and conducted in-depth interviews with representatives of the Departments of Finance, leaders of the People's Committees, and leaders and civil servants from various functional offices - including the Economic, Infrastructure and Urban Affairs Office and the Culture and Social Affairs Office at the ward level, as well as the Economic Office at the commune level. In total, 14 newly consolidated communes and wards across the three provinces and the municipality were surveyed. Altogether, the research team interviewed 46 officials responsible for finance and budgeting, comprising 12 provincial-level officers and 34 commune- and ward-level officers.

CHAPTER II. POTENTIAL POLICY AND PRACTICE GAPS AFFECTING CITIZEN PARTICIPATION IN THE STATE BUDGET PROCESS IN THE CONTEXT OF LOCAL GOVERNMENT RESTRUCTURING

On 1 July 2025, the two-tier local government model (provincial level and commune) officially came into operation. The restructuring of local governments in Vietnam - including the dissolution of district-level governments and the merger of commune-level units - aims to streamline the governmental apparatus, reduce fiscal expenditures, and improve the effectiveness of public administration. However, this process has revealed potential gaps between policy and practice, which directly affect citizens' participation in the state budget process. These gaps are outlined as follows:

1. Institutional gap: A lack of regulations and guidance on direct citizen participation in the budget process

Although the Constitution affirms citizens' right to direct participation, laws and subordinate instruments have not sufficiently articulated this right in the context of budget management. Participation remains largely indirect, mediated through representative organizations (VESS, CDI & UNDP, 2024). This finding is supported by independent research. According to the 2023 Open Budget Survey (OBS) conducted by the International Budget Partnership (IBP) and published in 2024, the Vietnamese Ministry of Finance has organized public consultations during the budget preparation stage. However, there are no mechanisms for citizen participation in budget monitoring, nor have there been efforts to directly engage disadvantaged communities or consult with their representative social organizations. While the National Assembly conducts budget hearings (Q&A sessions), it has not yet allowed individuals or social organizations to provide input during these sessions. Vietnam scored 19 out of 100 points on public participation in OBS 2023, ranking 41st of 120 surveyed countries (IBP and CDI, 2024).

Similarly, the 2023 Provincial Open Budget Index (POBI) results reveal that localities rarely create opportunities for public participation in budgeting. The average participation score was 54.92 out of 100 points. Only 11 out of 63 provinces publicly announced opportunities to contribute feedback on the 2023 Draft Budget through written communication or their official web portals. Additionally, only 17 provincial People's Council web portals included a Q&A section and activity history, while only 33 out of 63 provincial Departments of Finance web portals provided similar content.

At the commune level, budget information is typically shared via People's Council deputies at voter meetings or through local representatives such as village, hamlet, or neighbourhood heads, primarily as one-way announcements rather than through consultation or public feedback mechanisms (VESS, CDI & UNDP, 2024). The 2024

Vietnam Provincial Governance and Public Administration Performance Index (PAPI) report (CECODES, RTA & UNDP, 2025) also shows a decline over the past four years in the percentage of citizens who reported being invited to provide input in planning and designing local public projects.

This situation aligns with the broader assessment presented in Decision No. 759/QĐ-TTg dated 14 April 2025, which states: *“The process of building and improving the socialist rule-of-law state under the Party’s leadership requires increased public participation in state management. In practice, participation remains limited due to incomplete and inconsistent awareness among both society and managers; legal regulations remain insufficient and unclear for enabling state agencies, especially representative bodies (People’s Councils), to perform their mandates effectively; and mechanisms to allow the public to monitor their representatives are lacking. Additionally, there are no suitable or effective formats, methods, or organizational models to ensure substantive citizen participation.”*

On **25 June 2025**, the **National Assembly** adopted the **State Budget Law (Law No. 89/2025/QH15)**, replacing Law No. 83/2015/QH13. Notably, Article 16 on community oversight of the state budget remains unchanged from the 2015 State Budget Law. Thus, the provisions enabling direct citizen participation in the budget process have not evolved.

Beyond Article 16 on community monitoring oversight of the state budget, the 2015 State Budget Law does not contain any requirements for budgetary units to consult with the public, explain draft budgets, or respond to citizen input during the budgeting process. Citizens are currently only permitted to provide input on investment projects as stipulated in Clause 2, Article 74 of the 2019 Public Investment Law, which concerns community oversight of investment. This clause states: *“The competent authority shall consult, explain, and accept feedback from the residential community where a project is implemented regarding decisions on investment in important national projects, group A projects, projects involving large-scale migration and resettlement, or those with high environmental impact risks. These include matters related to investment policies, construction, land use, waste management and environmental protection, compensation, site clearance, and resettlement plans as provided by law.”*

In recent years, a positive development is that the Ministry of Finance has consulted the public on the draft State Budget Estimate submitted to the National Assembly, aligning with international best practices. This demonstrates that local governments also have the capacity to consult the public on the Budget Estimates they submit to the People's Councils. This practice should be institutionalized in the guiding implementation decree of the revised State Budget Law 2025.

According to Decision No. 759/QĐ-TTg, the commune-level local government will receive greater delegation and decentralization from central and provincial authorities. By abolishing all district-level administrative units and consolidating

smaller commune-level units into larger entities, the responsibilities and powers of the current district-level governments are transferred to commune-level governments. As a result, commune-level governments will be granted more authority in managing the state budget.

2. Information gap: The level of budget disclosure and transparency remains low across most budget levels, limiting public access

Budget transparency and publicity are institutionalized in legal documents at the highest level—in Article 55 of the 2013 Constitution. Following the promulgation of the 2013 Constitution, the provisions on budget disclosure were specified through the amendment of the 2002 State Budget Law, which was reissued in 2015, along with a series of guiding Decrees and Circulars. In addition to the 2015 State Budget Law, budget documents must also be disclosed in accordance with various other legal instruments, including the 2016 Law on Access to Information, the 2019 Law on Public Investment, the 2015 State Audit Law, and the 2022 Law on Implementation of Grassroots Democracy.

However, in practice, a gap remains in the disclosure of budget information to the public, contrary to the requirements of the law. At the commune level—the tier of government closest to the people—public trust in the availability of budget revenue and expenditure information remained limited during the 2021–2024 period (CECODES, RTA & UNDP, 2025). Out of more than 17,000 people surveyed in the 2024 PAPI survey, only about 7,200 individuals (approximately 42.5 percent) reported that commune-level budget revenue and expenditure were publicly disclosed. Among these, only around 24.5 percent stated that they had read the budget revenue and expenditure statements—equivalent to just 10.4 percent of total survey participants—and over 96 percent said they had no opinion on the disclosed statements.

At the district level, a 2023 review of the publication of budget information on the official web portals of district-level People's Committees showed that the average district budget disclosure score nationwide was only 21.93 out of 100—classified as "low" (VESS, CDISE, and UNDP, 2024). At the provincial level, the 2023 Provincial Open Budget Index (POBI) indicated an increasing trend of reduced transparency among provinces (VESS and CDI, 2024). At the ministerial and central agency level, the 2021 survey results revealed that 50 percent (22 out of 44 ministries and central agencies) disclosed only minimal budget information, while up to 20.5 percent (9 entities) did not disclose any budget information at all (VESS and CDI, 2022). At the national level, the 2023 Open Budget Survey (OBS) recorded improved results for Vietnam compared to 2021; however, the country still ranked only 52nd out of 125 participating countries and was only ahead of Cambodia, Malaysia, East Timor, and Myanmar within Southeast Asia.

Currently, budget information and data are disclosed in forms prescribed by Circular No. 343/2017/TT-BTC. However, this information is often too complex for the general public to understand (VESS, CDI & UNDP, 2024). Findings from the OBS and POBI surveys show that only the Ministry of Finance and a few provinces have developed and publicly released simplified and user-friendly summary reports on budget information—commonly referred to as "Budget Reports for Citizens." Based on these good practices, there should be official guidance for commune-level authorities to prepare and publish State Budget Reports for Citizens. This would support the objective of administrative unit reorganization, and the development of a two-tier local government model aimed at "*... ensuring that commune-level authorities are close to the people, accessible to the people, and best serve the people.*"

The revised 2025 Law on State Budget introduces several progressive provisions, notably the expansion of the scope and subjects required to publicly disclose information related to off-budget financial funds. However, the new Law abolishes the provision specifying fixed disclosure timelines and delegates the authority to the Government to provide detailed regulations "to ensure flexibility in implementation." In practice, the implementation of Article 15 of the 2015 Law on State Budget, which prescribed specific disclosure timelines, has not been strictly observed by agencies, organizations, and authorities from the central to the local level. The timeliest disclosed document on the portals of ministries and central agencies was the 2020 budget revenue–expenditure settlement, made available by only 27.27 percent of units (VESS & CDI, 2022). At the district level, the timeliest disclosed document was the 2022 district budget settlement, yet only 32.2 percent of districts published this document on time (VESS & CDISE, 2024). If the Government does not provide detailed regulations on the timelines for disclosing budget documents, this would represent a regression in the legal framework for budget transparency and would also be inconsistent with the provisions on information disclosure timing stipulated in Clause 4, Article 18 of the 2016 Law on Access to Information. This regulatory gap could enable budget-using units to avoid timely disclosure, thereby restricting citizens' access to budget information and limiting their ability to participate in budget oversight as prescribed by law.

3. Geographical and administrative distances – Require innovation and a diverse combination of budget information disclosure forms

Although practices related to public consultation on budget documents have not been widely implemented, especially at the local level, the relocation of administrative headquarters following the merger has increased the geographical distance between the people and the government. This poses challenges to the implementation of budget consultation activities, particularly in mountainous and remote areas. One possible solution is to organize online consultations and gather public input through information technology means, such as computers and smartphones with internet access. However, not all government agencies, especially at the commune level, have

web portals to transmit information and documents to the people. Likewise, not all citizens have the means or own smartphones with internet access to participate and provide feedback (not to mention the limited public interest in budget information, as previously analysed).

While the geographical gap caused by administrative mergers is evident, “narrowing” the digital gap also presents a significant challenge - especially concerning investments in infrastructure (hardware, internet connectivity devices), human resources (qualified personnel, IT expertise, site management), and the availability of electronic equipment and stable internet connections. Maximizing and reallocating existing infrastructure resources - particularly at the district level - is crucial and should be carefully assessed and planned before making any decisions on new purchases to minimize waste.

As e-government initiatives are being extended to commune-level authorities, the 2025 State Budget Law also includes provisions mandating the public disclosure of budget information and documents through web portals. It is essential that the law clearly defines and includes “web portals” to avoid any legal loopholes. According to current statistics, all 696 district-level units had official web portals. With the abolition of the district tier, these portals ceased operation. Therefore, a clear transition plan is needed to transfer and repurpose these platforms for newly formed commune-level administrative units after the merger—especially those that currently lack such digital infrastructure.

The 2024 PAPI report indicates that while the “digital divide” is narrowing, there remains a “persistent disparity” in internet access rates across different population groups: women have 5-10 percent lower access rates than men; ethnic minorities, 10-20 percent lower than the Kinh majority; and rural areas, 9 percent lower than urban areas (CECODES, RTA & UNDP, 2025). For ethnic minority communities in particular, the main barriers to internet access relate to affordability (the cost of acquiring and maintaining equipment and services) and to poor mobile infrastructure, which is often a result of geographic and topographical challenges (CECODES, RTA & UNDP, 2025). Solutions to these issues require further discussion and exploration (CECODES, RTA & UNDP, 2025).

Currently, several programmes support smartphone access for citizens. These include free smartphone distribution for poor households initiated by the Ministry of Information and Communications (now merged with the Ministry of Science and Technology); a programme by VNPT Quang Ninh offering free smartphones and 4G SIM cards to poor and near-poor households; and a subsidy programme (up to 500,000 VND per smartphone) under the Vietnam Public Telecommunications Service Fund. However, the results and effectiveness of these initiatives require a comprehensive evaluation, as many people still lack internet access and telecommunication services. Therefore, it remains essential to maintain the provision

of on-site budget information. Regulations concerning the forms and locations for public disclosure should be expanded to include village/hamlet/residential group headquarters rather than being limited to commune-level People's Committee offices, especially given the increased geographical distances following administrative mergers. At higher administrative levels, budget documents should be provided in multiple formats and languages to ensure accessibility for vulnerable groups such as the deaf, the blind, and ethnic minorities who do not speak the national language, so that no one is left behind.

CHAPTER III. STATUS OF WEB PORTAL LINKAGE BETWEEN PEOPLE'S COMMITTEES AT ALL LEVELS ACROSS 63 PROVINCES BEFORE THE MERGER

1. Overview of web portal linkage between provincial, district and commune levels

As of 21 May 2025, according to the administrative unit list published on the web portals <https://danhmuchiachinh.gso.gov.vn>, Vietnam has 63 provinces/centrally governed municipalities (hereinafter referred to as provinces), 696 districts/towns/cities under centrally-governed municipalities (hereinafter referred to as districts), and 10,035 communes/wards/towns (hereinafter referred to as communes).

Our review indicates that all 63 provinces had an official web portals with the gov.vn domain, each marked with "Connected to EMC." EMC is a system developed by the Ministry of Information and Communications to measure, evaluate, monitor, and manage the provision and effective use of information and online public services by state agencies (according to the EMC System Connection Guidelines, attached to Official Letter No. 1043/BTTTT-CDSQG dated 25 March 2024, from the Ministry of Information and Communications). Similarly, all districts also have their web portals accessible.

The review also reveals that for the linkage of web portals between provinces and districts (where the provincial portal has a direct link to the district's portal) and between provinces and communes (where the provincial portal has a direct link to the commune's portal), there are three common methods of linkage display, with examples provided in Table 1.

Accordingly, **Type 1** groups communes by district. Type 2 separates links but maintains district grouping. Type 3 lists districts and communes separately without grouping. **Type 2** means the links to district and commune web portals are placed in separate areas, and communes are also grouped by their respective districts. Finally, **Type 3** indicates that districts and communes are still arranged separately, but without communes being grouped by their respective districts.

All forms and interfaces for presenting these links are treated similarly because they all fulfil the function of ensuring information linkage among different levels of government and People's Committees. However, **Type 2** is superior as it offers greater convenience in finding and accessing the web portals of each specific district or commune within the province.

Table 1: Types of Website Link Display

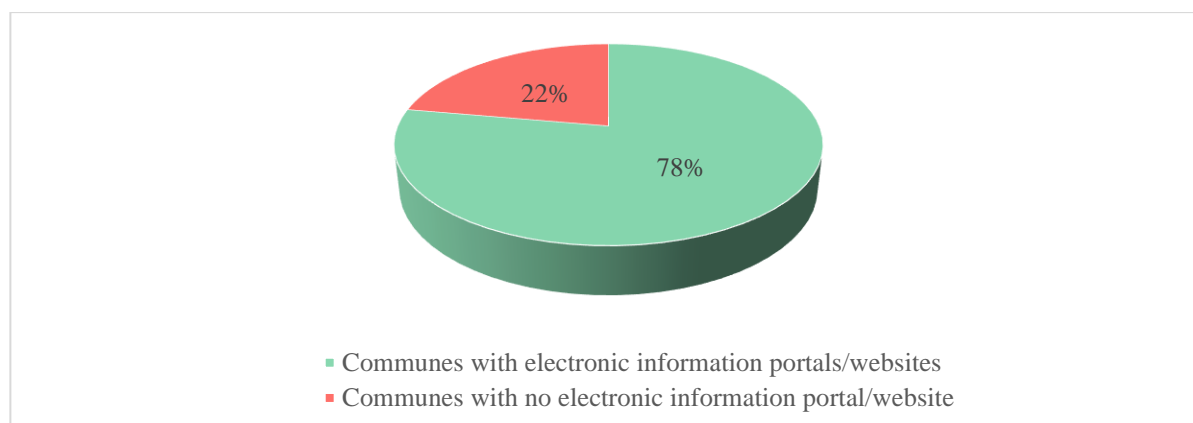
Type 1	Type 2		
<div><div>LIÊN KẾT WEBSITE</div><div><div>Trang thành phần</div><div><div></div></div><div><div>- Phường Nại Hiên Đông</div><div>- Phường Phước Mỹ</div><div>- Phường Thọ Quang</div><div>Quận Ngũ Hành Sơn</div><div>- Phường Mỹ An</div></div></div></div>	<div><div>Thành phố Long Xuyên</div><div><div>> Phường Bình Đức</div><div>> Phường Mỹ Long</div><div>> Phường Mỹ Thái</div><div>> Phường Bình Khánh</div><div>> Phường Mỹ Phước</div><div>> Phường Mỹ Xuyên</div><div>> Phường Đông Xuyên</div><div>> Phường Mỹ Quý</div><div>> Xã Mỹ Hòa Hưng</div><div>> Phường Mỹ Bình</div><div>> Phường Mỹ Thạnh</div><div>> Xã Mỹ Khánh</div><div>> Phường Mỹ Hòa</div></div></div> <div><div>Thành phố Châu Đốc</div><div></div></div> <div><div>Thị xã Tân Châu</div><div></div></div>		
Type 3			
HUYỆN - THÀNH PHỐ	SỞ, BAN, NGÀNH	UBND XÃ, PHƯỜNG, THỊ TRẤN	CƠ QUAN KHÁC
<div><div>UBND PHƯỜNG QUẢNG THÀNH</div><div>UBND XÃ ĐẮK R'MOAN</div><div>UBND XÃ ĐẮK NIA</div><div>UBND PHƯỜNG NGHĨA TÂN</div><div>UBND PHƯỜNG NGHĨA</div></div>	<div><div>UBND XÃ QUẢNG KHÊ</div><div>UBND XÃ QUẢNG SƠN</div><div>UBND XÃ ĐẮK PLAO</div><div>UBND XÃ ĐẮK SOM</div><div>UBND XÃ ĐẮK HA</div><div>UBND XÃ ĐẮK RMĂNG</div></div>	<div><div>UBND XÃ ĐẮK WER</div><div>UBND XÃ NHÂN CƠ</div><div>UBND XÃ NHÂN ĐẠO</div><div>UBND XÃ NGHĨA THẮNG</div><div>UBND XÃ ĐẠO NGHĨA</div><div>UBND XÃ ĐẮK SIN</div></div>	<div><div>UBND XÃ NAM ĐÀ</div><div>UBND XÃ ĐẮK SỜ</div><div>UBND XÃ NAM XUÂN</div><div>UBND XÃ ĐẮK DRÔ</div><div>UBND XÃ NĂM NUNG</div><div>UBND XÃ TÂN THÀNH</div></div>
<div>Notes: Illustration Type 1 from Da Nang City's Electronic Information Portal (https://danang.gov.vn/); Illustration Type 2 from An Giang Province's Electronic Information Portal (https://angiang.gov.vn/vi/xa-phuong-thi-tran); Illustration Type 3 from Dak Nong Province's Electronic Information Portal (https://daknong.gov.vn/).</div>			

Source: Research team's synthesis from various web portals

2. Statistics on web portal linkage between provincial, district and commune levels

A positive signal is that 78 percent (7,805 units) of all communes nationwide had a web portal before merger. Still, the remaining 22 percent (2,230 units) did not yet have one.

Figure 1: Percentage of communes with web portals at the time of review (May 2025)

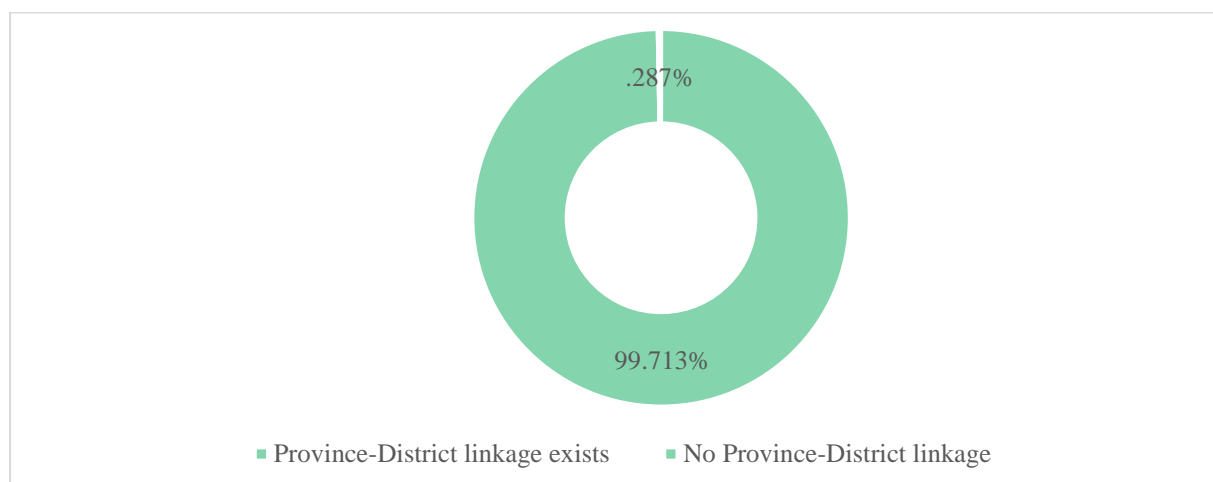


Source: Data compiled by the Research team

Among them, some provinces have achieved 100 percent of their communes with operational web portals. These include An Giang, Ba Ria – Vung Tau, Bac Ninh, Binh Thuan, Ca Mau, Cao Bang, Da Nang, Ha Giang, Hai Duong, Hai Phong, Lao Cai, Long An, Tuyen Quang, and Vinh Long. In contrast, two provinces have no communes with working web portals: Vinh Phuc and Can Tho (See Table 2 for details).

At the time of review, the linkage level between the web portals of the provincial and district governments was generally good across all 63 provinces (see Figure 2). Almost all districts had direct links on their respective provincial People's Committee's web portals. Only two districts, Nam Po District (Dien Bien Province) and Song Ma District (Son La Province), did not have a web portal linkage between the province and district. Although the names of these two districts were listed on the provincial web portals, the links leading to their respective district portals were either incorrect or faulty.

Figure 2: Percentage of District People's Committee web portals linked from Provincial People's Committee web portals

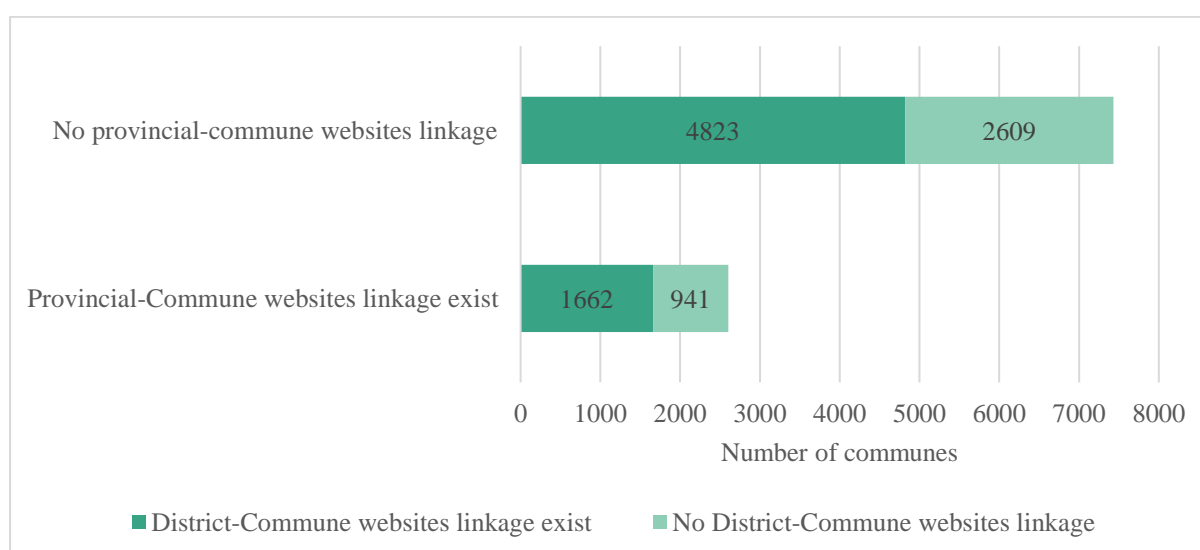


Source: Data compiled by the Research team

Our review of provincial People's Committee web portals shows that 2,603 communes (25.9 percent of all communes) have their web portals directly linked from the provincial People's Committee's portal. Meanwhile, 6,485 communes (64.6 percent of all communes) are directly linked from the district People's Committee's portal. This indicates that the web portal linkage between districts and communes is still more common than that between provinces and communes (See Figure 3).

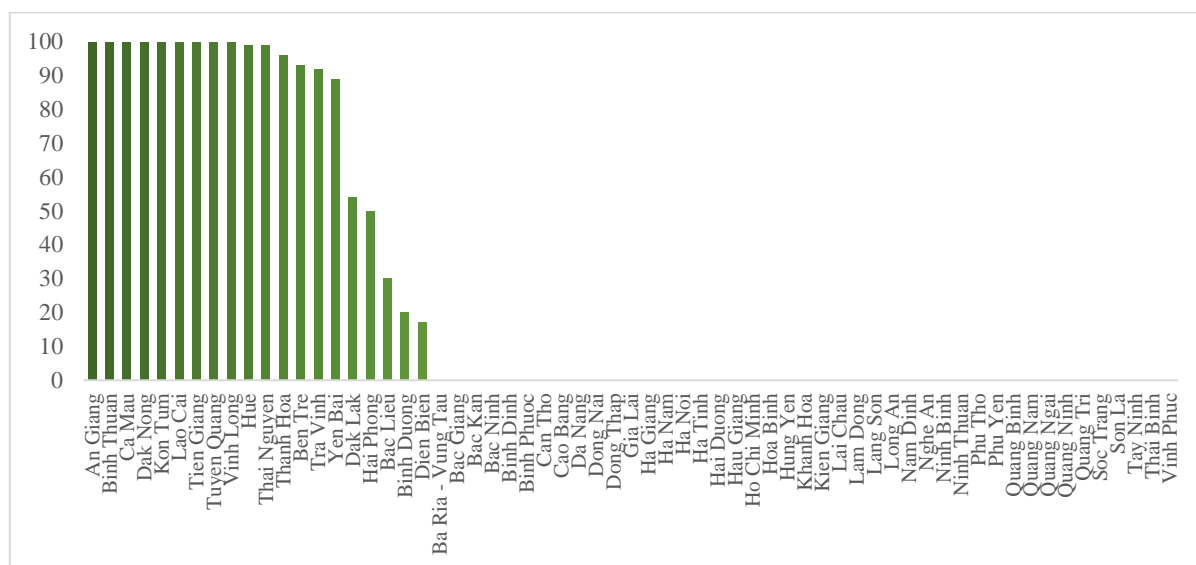
Communes not directly linked on either the district or provincial web portal fall into either one of two categories: (i) The commune has a web portals, but it is not linked from provincial web portals. (ii) The commune either does not have a web portal, or its portal no longer exists.

Figure 3: Web page linkage data between Province-Commune and District-Commune



Source: Data compiled by the Research team

Figure 4: Statistics by province for percentage of commune web portals directly linked from provincial People's Committee web portals



Source: Data compiled by the Research team

Figure 4 shows that only 20 out of 63 provinces have at least one direct web portals link between the province and its communes. Among these, 9 provinces have a 100 percent linkage rate for web portals between the province and its communes.

Table 2: Statistics of inter-government web portal linkage and state budget disclosure

Provinces/ Cities	Number of subordinate communes	Number of communes with web portals	Percentage of communes with web portals	Percentage of province-commune linkage	Number of communes with state budget disclosure folders	Number of communes with state budget disclosure documents
An Giang	155	155	100	100	1	19
Bà Rịa - Vũng Tàu	77	77	100	0	5	50
Bắc Giang	192	171	89.1	0	0	95
Bắc Kạn	108	93	86.1	0	51	31
Bạc Liêu	64	12	18.8	29.7	0	0
Bắc Ninh	121	121	100	0	0	0
Bến Tre	148	137	92.6	92.6	0	3
Bình Định	155	61	39.4	0	42	24
Bình Dương	91	65	71.4	19.8	2	2
Bình Phước	111	90	81.1	0	0	4
Bình Thuận	121	121	100	100	116	15
Cà Mau	100	100	100	100	1	4
Cần Thơ	80	0	0	0	0	0
Cao Bằng	161	161	100	0	121	140
Đà Nẵng	47	47	100	100	8	18
Đắk Lắk	180	142	78.9	54.4	1	8

Provinces/ Cities	Number of subordinate communes	Number of communes with web portals	Percentage of communes with web portals	Percentage of province-commune linkage	Number of communes with state budget disclosure folders	Number of communes with state budget disclosure documents
Đắk Nông	71	69	97.2	100	35	23
Điện Biên	129	92	71.3	17.1	29	1
Đồng Nai	159	3	1.9	0	0	1
Đồng Tháp	141	67	47.5	0	35	17
Gia Lai	218	214	98.2	0	66	55
Hà Giang	193	193	100	0	5	44
Hà Nam	98	97	99	0	0	0
Hà Nội	526	355	67.5	0	92	67
Hà Tĩnh	209	179	85.6	0	40	143
Hải Dương	207	207	100	0	207	164
Hải Phòng	167	167	100	50.3	77	64
Hậu Giang	75	15	20	0	3	0
Hồ Chí Minh	273	132	48.4	0	7	32
Hoà Bình	151	147	97.4	0	0	1
Huế	133	125	94	99.2	16	69
Hung Yên	139	102	73.4	0	13	24
Khánh Hòa	132	109	82.6	0	16	30
Kiên Giang	143	23	16.1	0	0	2
Kon Tum	102	83	81.4	100	24	5
Lai Châu	106	33	31.1	0	11	6
Lâm Đồng	137	114	83.2	0	88	3
Lạng Sơn	194	151	77.8	0	146	9
Lào Cai	151	151	100	100	2	16
Long An	186	186	100	0	1	15
Nam Định	175	164	93.7	0	88	110
Nghệ An	412	348	84.5	0	18	30
Ninh Bình	125	114	91.2	0	68	53
Ninh Thuận	62	7	11.3	0	5	1
Phú Thọ	207	164	79.2	0	31	5
Phú Yên	106	48	45.3	0	1	1
Quảng Bình	145	80	55.2	0	1	21
Quảng Nam	233	166	71.2	0	43	35
Quảng Ngãi	170	168	98.8	0	31	23
Quảng Ninh	171	168	98.2	0	27	38
Quảng Trị	119	114	95.8	0	2	18
Sóc Trăng	108	3	2.8	0	0	0
Sơn La	200	182	91	0	144	28
Tây Ninh	94	12	12.8	0	9	10
Thái Bình	242	229	94.6	0	0	0
Thái Nguyên	172	169	98.3	98.8	167	164
Thanh Hóa	547	543	99.3	96.3	38	43
Tiền Giang	164	69	42.1	100	62	6

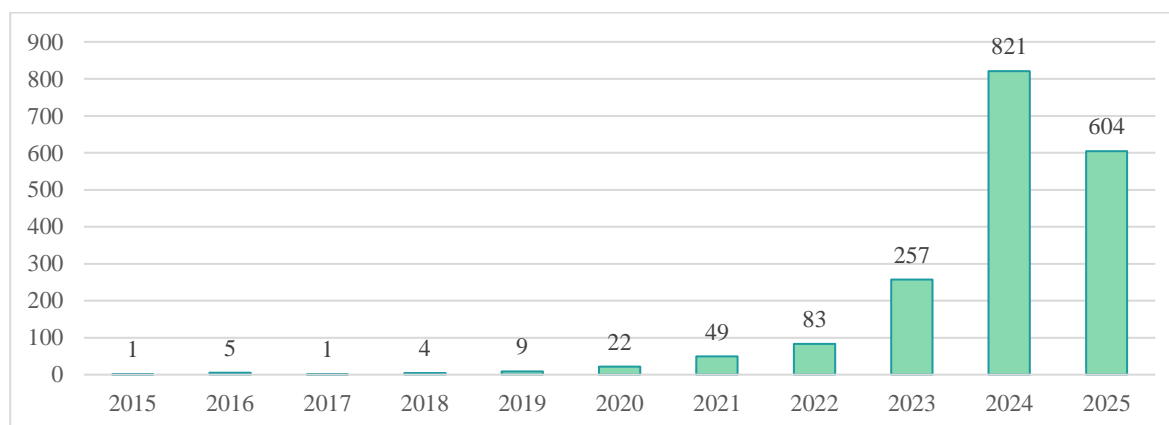
Provinces/ Cities	Number of subordinate communes	Number of communes with web portals	Percentage of communes with web portals	Percentage of province-commune linkage	Number of communes with state budget disclosure folders	Number of communes with state budget disclosure documents
Trà Vinh	104	96	92.3	92.3	7	18
Tuyên Quang	137	137	100	100	0	0
Vĩnh Long	102	102	100	100	0	10
Vĩnh Phúc	121	0	0	0	0	0
Yên Bái	168	155	92.3	89.3	63	35

Source: Data compiled by the Research team

3. Status of state budget disclosure on commune-level web portals

Our review reveals that some communes have publicly disclosed their commune-level budget documents on their People's Committee web portals. Only units that published disclosures with accompanying data and budget appendix tables were included; if only the disclosure decision was posted, we did not count it as a public disclosure document. In total, 1,856 communes had at least one budget public disclosure document from any year on their People's Committee web portals. This accounts for approximately 18.5 percent of all communes and about 23.8 percent of communes that have web portals. For budget documents related to the 2025 fiscal year, only 604 communes (6.0 percent of the total communes) publicly disclosed at least one type of document (Figure 5).

Figure 5: Statistics on the number of communes that have publicly disclosed at least one most recent budget document by fiscal year at the time of review (May 2025)

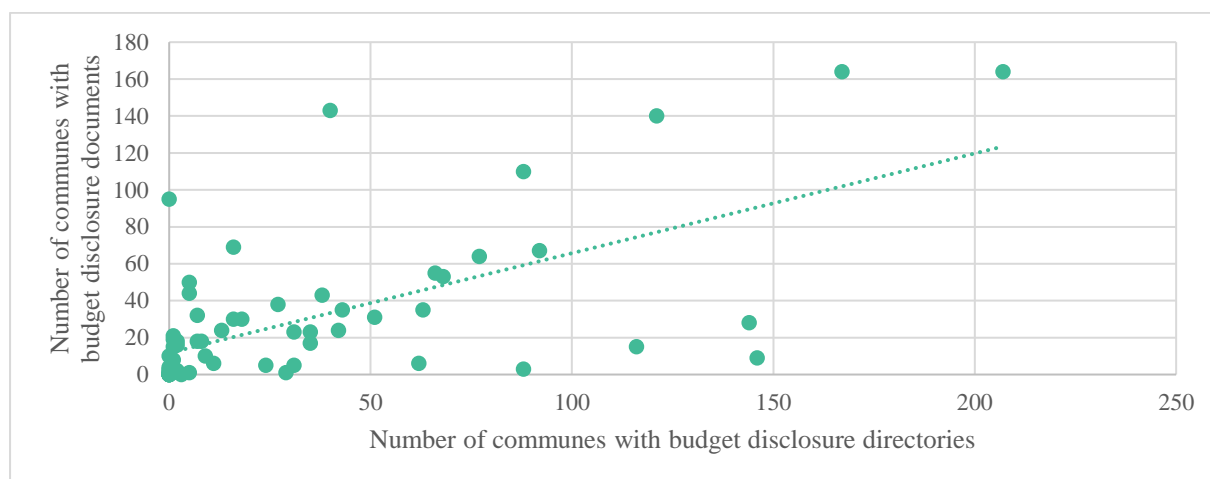


Source: Data compiled by the Research team

The total number of communes with a state budget disclosure folder is 2,066, which accounts for 20.6 percent of all communes (see Table 2 for specific data by province). It's important to note that some communes without a dedicated folder still publicly disclose budget documents; conversely, some communes with such a folder don't

publish any documents within it. Additionally, some communes disclose budget documents outside of the designated public disclosure folder.

Figure 6: Correlation between number of communes with budget disclosure directories and number of communes with budget disclosure documents (by provinces)



Source: Data compiled by the Research team

Despite this, Figure 6 shows the existence of a positive correlation between the number of communes with a dedicated budget disclosure folder and the number of communes with budget disclosure documents at the provincial level. This relationship suggests that a commune is more likely to publicly disclose budget documents if it has already set up a dedicated folder for budget disclosure activities.

The research team also conducted a quick review of commune-level web portals three months after the merger. Nationwide, there are now 3,321 commune-level units; 85 percent have official web portals. However, only 11.9 percent of all communes and 13.9 percent of communes with web portals had posted at least one budget document. Notably, Ho Chi Minh City, which has the largest number of commune-level administrative units (168 in total), had not yet established commune-level web portals.

These findings indicate that, although the share of communes with web portals increased after the merger compared with the pre-merger period, the share of communes disclosing budget information online decreased. Considerable work is therefore needed to promote budget disclosure, particularly given that the 2025 State Budget Law mandates online disclosure for units that have official web portals.

CHAPTER IV. LOCAL BUDGET DISCLOSURE IN THE CONTEXT OF ADMINISTRATIVE BOUNDARY REORGANIZATION UNDER THE TWO-TIER LOCAL GOVERNMENT MODEL

This chapter presents the practice of local budget disclosure in Viet Nam and identifies the facilitating factors and challenges in implementing budget transparency and public disclosure at the local level, in the context of the administrative boundary re-arrangement under the two-tier local government, as stipulated by the Resolutions of the National Assembly and the Standing Committee of the National Assembly. The chapter draws on survey results from 14 communes across three localities: in Lang Son Province (Dong Kinh Ward, Luong Van Tri Ward, Chi Lang Commune and Van Linh Commune; 29–30 July 2025); in Dien Bien Province (Dien Bien Phu Ward, Muong Thanh Ward, Muong Ang Commune and Na Tau Commune; 5–6 August 2025); and in Ho Chi Minh City (Sai Gon Ward, Tan Dinh Ward, Binh Duong Ward, Chanh Hiep Ward, Vung Tau Ward and Tam Thang Ward; 12–14 August 2025). The surveys were commenced exactly one month after the two-tier local government officially came into operation. The findings are summarised as follows:

1. Status of Budget Disclosure in the Surveyed Localities

1.1. Disclosure of Budget Documents of Pre-Merger Administrative Units

Pursuant to Point (c), Clause 1, Article 15 of the 2015 Law on the State Budget, the report on the implementation of the six-month (2025) budget estimate must be disclosed no later than 15 July 2025. However, the survey results indicate that, prior to the re-arrangement, most of the localities surveyed had not disclosed this report. Four out of five provinces had, before the re-arrangement, disclosed the report on the implementation of the first-half 2025 budget estimate on the web portals of the Provincial People's Committee and the provincial Department of Finance, namely Lang Son Province, Dien Bien Province, Ba Ria–Vung Tau Province and Ho Chi Minh City. Binh Duong Province had not disclosed this document on its provincial web portal.

At the time of the survey, all communes as well as districts in the surveyed provinces had not disclosed the report on the implementation of the first-half 2025 budget estimate. Post-merger feedback indicates localities lacked guidance on who is responsible for disclosing the first-half 2025 budget implementation reports of administrative units prior to the re-arrangement, because under the Law on the Organization of Local Government (Law No. 72/2025/QH15) and resolutions of the National Assembly and the Standing Committee of the National Assembly, pre-re-arrangement local governments ceased operation as of 1 July 2025, and the newly established governments took office on the same date. Therefore, the new local governments had no institutional basis to undertake disclosure related to the dissolved

units. As stated by the staff of Dien Bien Ward, Dien Bien Province: *“The budgets of the former units cannot be disclosed by the new ward because there is no basis to do so.”*

1.2. Disclosure of Budget Documents of Post-Merger Administrative Units

On 2 April 2025, the Ministry of Finance issued Official Letter No. 4205/BTC-NSNN providing guidance on principles for managing public finance and the State budget during the reorganization of administrative units at all levels and in the design of a two-tier local government model. The Official Letter stipulates that, following the streamlining of organizational structures, the provincial Department of Finance advises the provincial-level People’s Committee to submit to the same-level People’s Council for decision the 2025 State budget revenue estimates for the locality and local budget expenditure plans, including revenue sources and expenditure assignments between the provincial budget and the commune-level budget. Based on the 2025 budget estimates, post-reorganization, as approved and assigned by the competent authorities, the administrative units formed after the reorganization shall allocate, manage and finalize accounts in accordance with regulations. Accordingly, after the reorganization of administrative units is implemented, localities will proceed to develop and reallocate the 2025 State budget estimates.

Whether post-merger communes are able to issue a Resolution on the 2025 State budget estimates and allocation plan depends on whether the provincial level issues in a timely manner, a Resolution on the province’s 2025 budget revenue–expenditure estimates and budget allocation plan. Survey results indicate that most communes have not yet issued a Resolution on budget revenue–expenditure estimates and the budget allocation plan after the merger. Only four wards out of a total of 14 communes and wards surveyed had a People’s Council Resolution on their unit’s 2025 budget estimates, namely Sai Gon Ward, Tan Dinh Ward, Binh Duong Ward and Chanh Hiep Ward (Ho Chi Minh City).

In practice, the Ministry of Finance’s Official Letter did not mention post-merger budget disclosure. Therefore, disclosure continues to be implemented in accordance with the 2015 State Budget Law and relevant guiding Circulars. At the time of the survey, no commune or ward had posted post-merger budget documents. Although Tan Dinh ward and Binh Duong ward had issued decisions and notices on public disclosure of the 2025 budget estimates and allocations, public posting at the offices had not yet been carried out. A representative of the Binh Duong Ward’s Division of Economic Affairs, Infrastructure and Urban Affairs stated that, following the merger, the area for posting documents at the one-stop-shop unit was being prioritized for guiding citizens in administrative procedures; therefore, public posting would be carried out later. In Tan Dinh Ward, immediately after receiving advice from the survey team, public posting was promptly carried out on the notice board at the ward’s People’s Committee’s one-stop-shop unit, which makes information readily accessible to citizens.



Photo 1: An official from the Division of Economic Affairs, Infrastructure and Urban Affairs, Tan Dinh Ward, Ho Chi Minh City, posts budget documents for public disclosure at the Tan Dinh Ward People's Committee office.

Source: Research team, documented at the Tan Dinh Ward People's Committee, 2025

2. Challenges in disclosing budgets during the reorganization of administrative units

2.1. Lack of guidance on managing the budget data of pre-merger units

Survey findings indicate a lack of planning and strategy for managing information and data, including budget information previously disclosed on the web portals of administrative units that ceased operation after the merger. In Lang Son and Dien Bien, as these provinces did not undergo provincial-level mergers, the provincial web portals remained unchanged. Before the merger, 151 out of 194 communes, wards and townlets in Lang Son had official portals, but only nine units disclosed budget information. In Dien Bien, although more than 70 per cent of communes had portals, only one unit published budget data. Some web portals of former district-level units have now been assigned to new commune-level units after the merger; however, it remains unclear who is responsible for managing, storing, publishing and updating information, given that the facilities have been handed over to the new commune while the former district-level units' contents remain unchanged. This indicates that the storage and management of budget information of former commune and district level units on web portals in the two provinces remain very limited. Prior to the merger, data storage and management were mostly manual and in hard-copy form. This requires relatively complex and time-consuming processes for storage, preservation and retrieval (if the data exists) when people seek to obtain and access information.

In Ho Chi Minh City, the city-level and department-level web portals continue to operate after the merger with Ba Ria–Vung Tau province and Binh Duong province. According

to the staff of the Ho Chi Minh City Department of Finance, the city plans to continue maintaining the web portals of former Binh Duong Provincial People's Committee and Ba Ria–Vung Tau Provincial People's Committee. A review shows that, as of August 2025, the web portals of the Binh Duong Provincial People's Committee and the Ba Ria–Vung Tau Provincial People's Committee remain operational and provide access to budget information disclosed by the provinces up to and including 30 June 2025. However, the web portals of former districts prior to the merger are no longer accessible. Ho Chi Minh City has not yet developed a plan for managing or transferring budget data and information previously disclosed on the web portals of subordinate units. This lack of coordination affects citizens' online access to budget information.

2.2. Limited Citizen Access to Pre-Merger Budget Information

As analysed above, the surveyed localities do not yet have a strategy or plan for the handover and management of documents that had been disclosed online before the merger. Accordingly, citizens' access to budget documents of former localities prior to the merger depends mainly on hard-copy records and the handover of such records to the relevant units after the merger. Survey findings show that this process has also faced a number of difficulties and challenges.

Documents, including budget documents of administrative units prior to the merger, are stored in accordance with the guidance in Articles 39 and 40 of Circular No. 06/2025/TT-BNV, which detailing a number of provisions of the Law on Archives (2024). In Lang Son province, Dien Bien province and Ho Chi Minh City, local officials reported that, as of 30 June 2025, all files and documents of units subject to merger had been handed over to the Provincial Archives Centre, all files were sealed and centrally stored.

In Ho Chi Minh City, completed files and documents are handed over to the archival authority, while files of unfinished matters are handed over to the responsible unit for continuing the process. Accordingly, the surveyed wards in Ho Chi Minh City have, in principle, not encountered major difficulties in the handover and storage of documents. The only exception is Tam Thang Ward (formerly under Ba Ria–Vung Tau Province), which has faced difficulties because all officers in charge of accounting in the former communes/wards had retired prior to the merger, resulting in challenges for new officers in accessing archived documents. By contrast, in Lang Son Province and Dien Bien Province, archived files were not categorised by completion status; all were sealed, making their use for current work difficult.

A leader of the Division of Economic Affairs, Infrastructure and Urban Affairs in Dien Bien Province said: *"We need certain files to address land-related issues; the previous city files have already been handed over to the Provincial Archives Centre. To use them, we must issue an official letter to the Department of Home Affairs; the Department then establishes a team to go to the commune to break the seal. After retrieving the files, they are resealed; when other files are needed, the process is repeated."* Similarly, a finance officer in Lang Son shared: *"All paper records on budgets and administration of the former communes/wards have been transferred to the archives and sealed after the merger. In particular, because the old files are sealed, unsealing must follow a strict procedure: permission must be obtained from the Provincial Data Centre and the unsealing must take place in the presence of at least three parties (including one technical officer, one officer from the Cultural Centre and a representative of the Provincial Archives Centre)."*

Officials also expressed uncertainty about how to respond when citizens request access to pre-merger budget information under Article 4 of the Law on Access to Information. Difficulties and bottlenecks reported by commune/ward officials regarding the handover, storage and retrieval of documents are summarised by the research team in Table 3.

Table 3: Handover of documents between units during the merger in Lang Son Province, Dien Bien Province, and Ho Chi Minh City: Views from local officials

Lang Son Province and Dien Bien Province	Ho Chi Minh City
<p><i>"Extracting information and data of the former commune after the merger is difficult, we now have to contact the province and then complete procedures to unseal the files. There is currently no consolidated data system established for unified management after the merger. All information has to be searched manually, checking each document and each item; officers have to figure out the numbers themselves, this takes a great deal of time and effort. In addition, the handover of personnel and information was not carried out thoroughly. When new assignments were received, many former officers were on business trips, studying, or had moved to other areas of work, so there was no one to</i></p>	<p><i>"For communes/wards, when I was still Head of the Division of Finance and Planning of District 1, I required the completion of final accounts and the handover of figures from mid-May. For the final accounts of the specialised divisions of the former District 1, the handover has not been completed because the specialised departments have not received them due to the absence of instructions from the Ho Chi Minh City People's Committee."</i> Officer, Tan Dinh Ward.</p> <p><i>"The former ward handed over documents and figures (from specialised divisions and the ward office) to the Office of the former Ward People's Committee, after which they</i></p>

<p>ask for specific information.” Officer, Chi Lang Commune, Lang Son Province.</p> <p>“We did not know who remained to carry out the handover, staff copied whatever they could, making the process very difficult. For the Division of Economic Affairs at present, the work is very difficult. At the former district level, the documents are all sealed; for the new commune level, no handover has been received, so we only have a number of advisory documents. Particularly for land settlement, we have to request the province to complete procedures to open the seal and then complete procedures to reseal. When the province receives the documents, they will carry out arrangement and classification; at this stage it has not yet been arranged, so we have to open and reseal.” Officer, Muong Ang Commune, Dien Bien Province.</p> <p>“Everything is stored in the archive; whenever something is needed, I call to request it, if not approved, then I have to plead and persist. It took me many weeks to obtain it.” Officer, Muong Thanh Ward, Dien Bien Province.</p> <p>“The units also coordinated to prepare handover minutes with State Treasury signatures; supporting documents for the years are collectively considered a complete set of documents. These were sealed and handed over here, they were transferred to this ward, there is a storage room (documents from six wards and one commune have all been transferred here) temporarily. As these files relate to subsequent operations, they will likely be retrieved. There are no soft files, units keep them themselves.” Officer, Dien Bien Ward, Dien Bien Province.</p>	<p>were transferred to relevant units after the merger. Files of district-level specialised divisions were handed over to the Office of the (former) District People’s Committee and then transferred to the new Ward People’s Committee after the merger. Once information on the administrative units to be merged was available, relevant officers proactively shared documents with stakeholders to enable the new apparatus to operate immediately after the merger.” Officer, Sai Gon Ward.</p> <p>“Local units (commune/ward/district) had one month to prepare the handover of figures and documents: separating completed figures from ongoing figures; expenditure had to be closed by 30 June; and the practical timeline for localities to close expenditure figures followed the milestones of 20 May and 31 May, and 30 June. New and former units hand over documents in accordance with the decentralised two-tier local government regulations.” Officer, Binh Duong Ward.</p> <p>“The handover of documents from the four former wards prior to the merger (paper files, handover inventories plus digital files) has not yet been completed because the four former accountants of the four wards have all retired.” Officer, Tam Thang Ward.</p>
---	---

Source: Compiled by the research team.

In practice, citizens can access budget documents under Article 21 of Circular No. 06/2025/TT-BNV (detailing the 2024 Law on Archives). To access archival documents, including budget documents, citizens (readers) must appear in person at the archives authority, present a citizen identification card or passport, register to use archival documents using the prescribed form, and pay fees for the use of archival documents. Accordingly, the complex procedures and the requirement to pay fees for the use of archival documents under Article 21 of Circular No. 06/2025/TT-BNV may hinder citizens' access to these documents.

2.3. Limited access to budget documents disclosed by publicly posting at Commune/Ward People's Committee offices

Public posting at the office premises is one of the most common disclosure methods used by Commune and Ward People's Committees. Following the mergers, commune and ward boundaries have expanded significantly. As a result, the distance from where residents live to the offices of the Commune/Ward People's Committees has increased compared with before the merger, particularly in mountainous communes. In Dien Bien province, the distance from the Na Tau Commune People's Committee to the farthest village is 25 km, and from Muong Ang Commune to the farthest village is 15 km. In Lang Son Province, the distance from the Chi Lang Commune People's Committee and the Van Linh Commune People's Committee to the farthest village is 12 km. Local officials reported that the long distance between residents' homes and the Commune People's Committee offices has created difficulties for residents in accessing public services, including accessing budget information posted at the Commune People's Committee offices, compared with before the merger. As shared by a representative of the Department of Finance of Dien Bien province: *"Posting at the office can still be carried out, but its reach to citizens is limited because of long geographic distances, large commune territories and limited educational attainment, so the level of citizen participation is also lower."*

According to accounts from commune/ward officials and the research team's observations, citizens primarily go to the Public Administrative Service Centre to complete administrative procedures; very few approach or work with other units of the Commune/Ward People's Committee. Accordingly, where the commune/ward level discloses budget information by publicly posting at its office, the posting location should be selected so that it is accessible to as many citizens as possible, for example, posting at the Public Administrative Service Centre and at the offices of villages, residential areas and neighbourhood groups.

2.4. Differences across localities in staffing arrangements for finance and planning functions affecting the implementation of budget disclosure

Pursuant to Circular No. 57/2025/TT-BTC of the Ministry of Finance, which provides guidance on the functions and tasks of Departments of Finance under Provincial People's Committees and on the functions, tasks and powers in the finance–planning

domain of specialised bodies under Commune-level People's Committees, the specialised bodies under Commune-level People's Committees (the Division of Economic Affairs or the Division of Economic Affairs, Infrastructure and Urban Affairs) are mandated to advise and assist the Commune-level People's Committee in performing state management of: public finance and the State budget; planning and investment; statistics; registration of household businesses, cooperative groups, cooperatives and unions of cooperatives; and support to enterprises and collective economic organisations.

Survey results indicate that, although the Divisions of Economic Affairs and the Divisions of Economic Affairs, Infrastructure and Urban Affairs have the same functions, tasks and powers in the finance–planning domain, there are significant differences across the surveyed communes in the human resources assigned to finance and planning (Table 4). The Division of Economic Affairs, Infrastructure and Urban Affairs of Binh Duong Ward and of Chanh Hiep Ward in Ho Chi Minh City have the largest numbers of specialists/staff responsible for finance and accounting, six and five staff members respectively. Each specialist/staff member is assigned one or two functions/tasks as stipulated in Circular No. 57/2025/TT-BTC. By contrast, the Division of Economic Affairs, Infrastructure and Urban Affairs of Dong Kinh Ward and the Division of Economic Affairs of Van Linh Commune in Lang Son Province have only one staff member in charge; other Divisions of Economic Affairs and Divisions of Economic Affairs, Infrastructure and Urban Affairs have two staff members. These civil servants are effectively responsible for all functions and tasks relating to public finance and the State budget of the Division of Economic Affairs/Division of Economic Affairs, Infrastructure and Urban Affairs, as guided by Circular No. 57/2025/TT-BTC. This results in excessive workloads for civil servants performing finance–planning functions, including the task of advising the commune-level People's Committee on implementing budget disclosure.

According to accounts from the localities, this situation results from compliance with the guidance of the Steering Committee for the Rearrangement of Administrative Units and for Establishing the two-tier local government model on maintaining the existing staffing headcount of district- and commune-level cadres and civil servants for assignment at the commune level,⁸ and with Decree No. 178/2024/ND-CP.⁹ Wards and communes with a larger number of civil servants performing finance and planning functions, such as Binh Duong Ward and Chanh Hiep Ward, are in this position because commune- and ward-level budget accountants retired under Decree No. 178. Wards and communes with fewer civil servants performing finance and budget functions,

⁸ Official Letter No. 09/CV-BCD of the Steering Committee for the Rearrangement of Administrative Units and the Establishment of the Two-Tier Local Government Model dated 30 May 2025, on temporary guidance for staffing arrangements in implementing the reorganization of administrative units and the two-tier local government.

⁹ No. 178/2024/ND-CP dated 31 December 2024, on policies and regimes for cadres, civil servants, public employees, workers and the armed forces in implementing the reorganization of the organizational apparatus within the political system.

such as Dong Kinh Ward and Chi Lang Commune in Lang Son Province, Muong Thanh Ward in Dien Bien Province, and Tam Thang Ward in Ho Chi Minh City, are likewise affected because the commune-level accountants of the former communes and wards had already retired under Decree No. 178 prior to the merger.

Survey results also indicate that the assignment of district-level civil servants to communes and wards after the merger has not been appropriate, particularly in communes and wards where many commune budget accountants retired under Decree No. 178/2024/ND-CP. Communes and wards that retained their former commune accountants prior to the merger or had civil servants in charge of finance and budget from the district Division of Finance and Planning, such as Tan Dinh Ward, Binh Duong Ward and Chanh Hiep Ward in Ho Chi Minh City, and Muong Ang Commune in Dien Bien province encountered fewer difficulties in carrying out finance and planning functions and tasks. Conversely, in communes where the commune accountants had already retired, the district officers assigned to positions at the commune level often had limited or no experience in budget related functions such as consolidating estimates, allocating estimates, final accounts and budget disclosure, as in Chi Lang Commune in Lang Son Province, Muong Thanh Ward in Dien Bien province and Tam Thang Ward in Ho Chi Minh City. This has affected the pace and results of implementing finance and budget functions and tasks at the commune level, as reflected in the views below:

“Previously, I worked at the district Division of Finance and Planning, responsible for land clearance, project infrastructure and the division’s expenditure accounting. When I took on new tasks on the commune’s public finance and budget after the merger, I was unfamiliar with the procedures and practices of budget accounting. I had not worked on the State budget before. In particular, expenditure items such as social security and the National Target Programme have very complex procedures and involve many different groups, so I lack practical experience in this field. The lack of specialised expertise in budgeting has required time for me to familiarise myself and has made it easy to become uncertain when handling new tasks.”

Chi Lang Commune’s Officer, Lang Son Province.

“Specifically, on the budget function, there is no dedicated lead, which significantly affects work timelines. Current staff have not fully grasped the city’s budget revenue and expenditure situation for the first six months prior to the merger, so consolidating and reconciling data takes a great deal of time. Guidance documents from the Department of Finance are numerous, lengthy and issued in quick succession, while I have to learn on my own because I have not received specialised training under the new model, which leads to overload and uncertainty in handling tasks.”

Dong Kinh Ward’s Officer, Lang Son Province.

“As for me, I am learning on the job and have to start from the beginning; whether I am granted lay off depends on the authorities. Another difficulty is that there are no former accountants; they have all retired. Most district departments have been reassigned elsewhere, and any decision to allocate or second staff to this ward is at the discretion of the province.”

Muong Thanh Ward's Officer, Dien Bien Province.

Table 4: Number of civil servants responsible for finance and budget in the Division of Economic Affairs or the Division of Economic Affairs, Infrastructure and Urban Affairs of the surveyed wards and communes

Ward/Commune	Number of civil servants	Positions and duties held prior to the merger
Lang Son Province		
Dong Kinh Ward	01	01 commune budget accountant of the former Yen Trach Commune, Cao Loc District
Luong Van Tri Ward	02	01 person was the budget accountant of Mai Pha Commune; 01 person previously served as Deputy Head of the Division of Finance and Planning of Lang Son City
Chi Lang Commune	02	01 person was the former commune budget accountant; 01 person was an accounting officer of the Division of Natural Resources and Environment of Chi Lang District
Van Linh Commune	01	01 commune budget accountant
Dien Bien Province		
Dien Bien Phu Ward	02	01 person previously served as the ward budget accountant; 01 person previously served as Deputy Head of the Division of Finance and Planning of Dien Bien Phu City
Muong Thanh Ward	01	01 person previously served as a records officer of the Division of Finance and Planning of Dien Bien Phu City
Muong Ang Commune	04	02 persons previously served as commune budget accountants; 01 specialist previously served at the Division of Finance and Planning of Muong Ang District; 01 person previously served as an accountant of the Vocational Education and Training Centre

Ward/Commune	Number of civil servants	Positions and duties held prior to the merger
Na Tau Commune	02	01 person previously served as a general accountant; 01 person previously served in office administration with concurrent duties
Ho Chi Minh City		
Tan Dinh Ward	04	03 persons from the Division of Finance and Planning of District 1, including the Head of the Division of Finance and Planning; 01 person from the accounting unit of the District 1 Inspectorate, Ho Chi Minh City
Sai Gon Ward	03	02 persons reassigned from the Division of Finance and Planning of District 1, Ho Chi Minh City
Binh Duong Ward	06	Budget accountants from wards and specialists of the Division of Finance and Planning of Thu Dau Mot City, Binh Duong Province
Chanh Hiep Ward	05	Budget accountants from wards and specialists of the Division of Finance and Planning of Thu Dau Mot City, Binh Duong Province
Vung Tau Ward	02	01 specialist of the Division of Finance and Planning of Vung Tau City; 01 former ward accountant
Tam Thang Ward	02	01 accountant of the Division of Natural Resources and Environment of Vung Tau City; 01 ward budget accountant

Source: Compiled from the research team's survey results

2.5. Commune-level disclosure indicators, content, and templates have not been updated to reflect the authority and tasks in finance and budget transferred from the district level

After the merger, commune governments have had greater finance mandates than before. Under Decree No. 125/2025/ND-CP dated 11 June 2025 delineating authority between the two-tier local government in the state management areas of the Ministry of Finance stipulates that the specialised body of the Commune-level People's Committee exercises the authority of the former district-level specialised financial body in the management and implementation of National Target Programmes (Point c, Clause 1, Article 5); and performs the tasks of the specialised financial body, the specialised construction body, and the body responsible for the management and use

of public assets under the District-level People's Committee in the management and use of public assets at agencies, organisations and units (Clause 2, Article 14).

In addition, prior to the merger, the commune-level financial model operated as a single budget level, but this level had only one budget-using entity, namely the Commune People's Committee, and there was no Level I budget estimating unit. All activities of the budget level and the budget-using entity were carried out by the Commune People's Committee.

After the merger, the commune-level financial model has changed. According to Official Letter No. 11113/BTC-NSNN of the Ministry of Finance dated 21 July 2025 providing guidance on certain contents on finance and the State budget at the commune level, it is specified that (i) the Office of the Commune Party Committee, the Commune Viet Nam Fatherland Front Committee and public service units under the Commune People's Committee are Level I budget estimating units of the commune budget, and (ii) specialised divisions and the Public Administrative Service Centre under the Commune People's Committee are designated by the Commune People's Committee as Level I budget estimating units, as appropriate. This financial model is broadly similar to the previous district-level financial model.

Survey findings indicate that all finance and budget officers of the surveyed communes and wards reported that they have not received guidance on which indicators and forms to use for commune-level budget disclosure after the merger. If the commune budget disclosure forms (Article 15 of Circular No. 343/2016/TT-BTC) are applied, the disclosure will lack information on the indicators, forms and explanatory notes that fall under the authority and tasks of the former district-level budget. If commune-level budget disclosure is conducted using the district-level budget disclosure forms (Article 11 of Circular No. 343/2016/TT-BTC), there is no legal basis. As reflected in the following comments:

"Regarding budget disclosure under Circular No. 343/2016/TT-BTC, the regulation specifies three disclosure levels (province, district and commune).

However, after the merger, there is no longer a district level, so it is unclear which level's forms should be used, resulting in confusion in budget disclosure and the absence of a clear legal basis."

Vice Deputy Head of the Division of Economic Affairs, Infrastructure and Urban Affairs, at a ward in Lang Son Province.

"A specific example illustrates this uncertainty: the Commune People's Council is scheduled to meet tomorrow to approve the budget estimate for the new year; then the commune must issue a decision and disclose the estimate. However, as of now, the commune is unclear about who will sign this disclosure decision. Previously, as a matter of practice, the Chairperson of the Commune People's Committee signed; since the Chairperson is no longer the account holder, determining the signing authority has become problematic. The lack of clarity on authority and procedures for budget

disclosure hinders compliance with the law and affects the timeline for subsequent finance and budget steps at the commune level. This issue has arisen after the merger and requires timely guidance or adjustments to standardize the budget disclosure process at the local level.”

Commune-level finance and budget officer, Lang Son Province.

Due to the absence of guidance on the indicators and disclosure templates for budget items previously under the authority and tasks of the district budget that have been transferred to the commune level, the disclosure documents of Tan Dinh Ward and Binh Duong Ward in Ho Chi Minh City disclose the commune budget estimate and other financial plans of the commune for 2025 as decided by the Ward People’s Council, in accordance with Clause 2, Article 15 of Circular No. 343/2016/TT-BTC. These disclosures include six forms from Form No. 103/CK TC-NSNN to Form No. 107/CK TC-NSNN. Accordingly, the 2025 budget estimate disclosure practices of Tan Dinh Ward and Binh Duong Ward comply with the guidance of Circular No. 343/2016/TT-BTC. Information and budget tasks transferred from the district to the commune level, such as State budget expenditure estimates for each agency and unit (for example, educational institutions, the Office of the Party Committee, the Office of the People’s Council and other Level I budget estimating units, if any), are not disclosed.

2.6. Insufficient preparedness for changes to disclosure under Article 15 of the 2025 Law on the State Budget

The 2025 Law on the State Budget (Law No. 89/2025/QH15) takes effect from the 2026 budget year (1 January 2026). Budget disclosure is provided for in Article 15. Compared with the 2015 Law on the State Budget, Article 15 introduces several changes, including:

- Adding disclosure on extra-budgetary state financial funds: such funds must disclose assigned financial plans, implementation of financial plans (six months and annual) and financial final accounts approved by the competent authority (Point a, Clause 1, Article 15 of the 2025 Law on the State Budget)
- Adding a disclosure modality on web portals: for agencies and units that have a web portal, disclosure on the agency’s or unit’s web portal is mandatory (Point b, Clause 1, Article 15 of the 2025 Law on the State Budget)
- Revising disclosure timelines: the 2025 Law no longer sets detailed timelines for disclosing budget contents and documents.

Survey findings indicate that, as detailed guidance on Article 15 of the 2025 Law on the State Budget has not yet been issued, localities have not yet prepared plans for budget disclosure in 2026. Nevertheless, they have committed to implementing the budget disclosure requirements, including disclosure of extra-budgetary financial funds, in accordance with the law.

2.7. Development of commune web portals remains incomplete and inconsistent

After the merger, Dien Bien Province has 45 commune-level administrative units. As of 1 August 2025, the survey shows that updating or creating new web portals for commune-level administrative units in Dien Bien Province had not been completed. On the Dien Bien Provincial Web Portal, the list of communes has been updated with the names of commune-level administrative units and hyperlinks. However, these 45 hyperlinks do not lead to the corresponding commune web portals; they redirect to one of 24 legacy web portals under Dien Bien Province. Accordingly, for Dien Bien Province, the number of communes with web portals, the number of communes with budget disclosure sections, and the number of communes with budget disclosure sections that contain content are all zero. It should be noted that, for legacy web portals of former commune-level administrative units whose addresses are being used as link targets for other units, there is a linked area titled “*Budget revenue and expenditure estimates and final accounts*,” which is equivalent to a budget disclosure section. However, the link points to content that covers only the budget disclosure of the former district level. This is an area that should be revised if ward and commune web portals in Dien Bien Province are created: there needs to be a separate budget disclosure section with the locality’s own budget disclosure documents, rather than those of the higher-level government.

Through a review of 65 wards and communes in Lang Son Province, it was recorded that 100 per cent (65 out of 65) have established official web portals that are operating stably. The commune web portals use a common provincial management platform, indicating a high degree of standardization in interface, layout and directory structure. Most sites include a “Budget Disclosure” section within the main menu, typically under the menu group titled “*General Information*”. With respect to budget disclosure directories, 64 of 65 wards and communes (98.5 per cent) have created a budget disclosure directory on their web portals. However, the extent of posting is uneven: only nine wards and communes actually have budget disclosure content in this directory, corresponding to 13.8 per cent of all units surveyed. However, the content of the disclosed document belongs to the former district that shares the same name as the newly established commune. Therefore, in essence, the new commune after the merger has still not implemented the online disclosure of budget information. Na Duong Commune is the only unit without a budget disclosure directory. In addition, there are numerous cases where the budget disclosure directory has been created but remains empty, with no documents posted.

Following the merger, Ho Chi Minh City has a total of 168 commune-level administrative units. As of 31 July 2025, the review shows that most communes, wards, and special administrative zones in the city had not yet undertaken the updating or creation of new web portals. Specifically, 166 out of 168 units, accounting for 98.81 per cent, did not have accessible portals consistent with the two-tier local government model. Only two units—Phu An Ward and Tan Uyen Ward—had

operational portals, although their approaches and designs differed. Tan Uyen Ward reused its former portal address (<https://tanuyen.binhduong.gov.vn/>, which is also linked on the ward's active Facebook page) but revised the content and updated the site's information to reflect its new affiliation under Ho Chi Minh City. Tan Uyen Ward is also the only locality with a dedicated Budget Disclosure (CKNS) section; however, the content published therein still pertains to the district-level unit to which the commune previously belonged. By contrast, Phu An Ward established a completely new portal, which currently does not include a CKNS section or any budget disclosure content.

CHAPTER V. CONCLUSIONS AND RECOMMENDATIONS

1. Conclusions

This thematic study on strengthening citizen participation and transparency in state budget management in Viet Nam, with a focus on budget disclosure in the context of merger of provinces and the implementation of the two-tier local government model, has contributed to providing a relatively comprehensive picture of the current situation, challenges and opportunities for innovation in this field.

First, the context of deep administrative reform, including the abolition of the district level, consolidation of communes and the establishment of a two-tier local government model, has brought fundamental changes to the structure of budget governance. The commune/ward level, long the level of government closest to the people, has been vested with greater authority and at the same time assumes greater responsibility for budget management and disclosure. This presents an opportunity to bring citizens closer to the budget process, but it also exposes institutional, infrastructural and implementation capacity constraints.

Analytical results show three major gaps that hinder citizens' participation in the budget cycle: (i) an institutional gap – a lack of specific regulations that bind state agencies to consult and take into account direct input from citizens; (ii) an information gap – low levels of transparency with budget documents that are difficult to access and incomprehensible to the vast majority of citizens; (iii) a geographical and infrastructure gap – administrative consolidation has increased the physical distance between citizens and government while “the digital divide” has not been fully addressed, particularly in rural and mountainous areas and in areas inhabited by ethnic minorities.

A nationwide review shows that while 78 percent of communes have web portals or online portals, only about 18.5 percent have actually published budget documents. Furthermore, fewer than 6 percent have disclosed for fiscal year 2025. The share of communes with a dedicated budget disclosure directory is just over 20 percent. In many cases, a directory exists but contains no documents or conversely documents are posted without a dedicated directory. The data reveals that online disclosure remains largely formalistic.

Linkages between web portals and web portals across levels of government are also inconsistent. While all provinces maintain web portals, only a small proportion have direct links to the commune/ward level. Most communes and wards are accessed via district portals, but with the abolition of the district level under the two-tier local government model, the risk of losing this connection channel is substantial. Thus, immediately prior to the consolidation, the system of linkages and budget information disclosure had already revealed limitations in coverage, timeliness, and accessibility for citizens.

Field surveys in 14 communes and wards in Lang Son Province, Dien Bien Province, and Ho Chi Minh City revealed numerous challenges. Following the mergers, many newly formed communes and wards lacked experienced personnel, while staffing arrangements remain inadequate. Newly appointed accounting and finance officers have had to independently familiarize themselves with records and data, which consumes considerable time and increased the risk of errors. This highlights that, beyond institutional, informational, and infrastructural gaps, the human factor – in particular the capacity and skills of officials responsible for budget disclosure – also constitutes a critical bottleneck that needs to be addressed. Without targeted induction, training, and practical guidance, budget disclosure at the commune level is unlikely to become substantive. Furthermore, budget files of pre-merger units were largely transferred in hard copy to provincial archival centres and placed under seal, which made data extraction particularly difficult.

District-level web portals, which had previously served as a key channel for online budget disclosure, are no longer operational, while many newly established communes have yet to develop their own portals. This has created gaps in information access, making it difficult for citizens to obtain budget data of pre-merger units. For post-merger budgets, most of the surveyed communes and wards had not yet adopted Resolutions on the 2025 budget estimates and allocations, largely due to delays at the provincial level. In certain cases, such as Tan Dinh Ward and Binh Duong Ward in Ho Chi Minh City, Resolutions were issued, but public posting practices remained limited. At the same time, the availability of programmes to promote universal access to smartphones, subsidize telecommunications services, and initial efforts to introduce “citizens’ budget reports” at the provincial level highlight considerable opportunities to enhance transparency, particularly at the level of communes, wards, and special administrative units under provinces.

The disclosure of public budgets and the strengthening of citizen participation are not only requirements of modern governance but also foundational conditions for consolidating social trust, enhancing accountability and realizing meaningful local democracy. When citizens are able to easily access and understand budget information and have channels to engage in feedback, the relationship between the state and the people can shift from one of “management–compliance” to one of “cooperation–partnership.” Research indicates that budget transparency at the commune and ward level in Viet Nam remains limited, particularly following the 2025 administrative reforms. Gaps in information, shortages of human resources and digital infrastructure, together with the absence of legal mechanisms for direct citizen engagement, continue to pose significant challenges. Nevertheless, by leveraging institutional reforms, digital transformation, and capacity building for local officials, Viet Nam has the potential to transform the merger process into a driver for building a more transparent, accountable, and inclusive governance system—one in which citizens can participate substantively in the state budgeting process.

2. Recommendations

The reorganization of administrative units under the two-tier model, as mandated by resolutions of the National Assembly, has created substantial challenges for budget disclosure and for ensuring citizen participation in the budget cycle. To strengthen the implementation of budget disclosure and to enhance citizens' access to budgetary information, this study proposes the following recommendations:

Recommendation to the National Assembly

- The National Assembly should pilot institutional mechanisms enabling citizens and organizations to directly participate in budget deliberations during sessions of the National Assembly and People's Councils at provincial and commune levels.

Recommendations to the Government

- The Government should promptly issue a decree and circular providing detailed guidance on state budget disclosure for the effective implementation of the 2025 Law on State Budget Law. Such guidance should reintroduce specific provisions on the timing of disclosure for each type of budget document, as was stipulated under the 2015 State Budget Law. Should detailed timing not be specified, the decree and circular should explicitly state that disclosure timelines shall follow Clause 4, Article 18 of the 2016 Law on Access to Information.
- Sanctions should be introduced for non-compliance with budget disclosure obligations, in line with existing penalties for violations of accounting, reporting, and budget finalization requirements.
- The Government should mandate the Ministry of Home Affairs, in coordination with other relevant ministries, to develop guidance on the management and continued accessibility of information and data previously disclosed on the portals of pre-merger entities, including budgetary information. This would ensure uninterrupted public access to historical budget data and information.
- The Government should conduct assessments of the enforcement of budget disclosure laws and report the findings to the National Assembly, the Standing Committee of the National Assembly, and the State President, in accordance with legal requirements.

Recommendations to the Ministry of Finance

- The Ministry of Finance should promptly issue a Circular guiding budget disclosure under the 2025 State Budget Law (replacing Circulars No. 343/2016/TT-BTC, No. 61/2017/TT-BTC, and No. 90/2018/TT-BTC). The Circular should establish disclosure indicators and templates aligned with the two-tier local government model, while ensuring compatibility with the Treasury and Budget Management Information System (TABMIS).
- Guidance should also be issued for commune-level People's Committees to post budget information both at commune offices and at village community houses.

Budget disclosure tables should be displayed at locations frequently accessed by citizens, such as commune-level public service centres and community houses in villages. The Circular should specify both the timeline and duration of such postings.

- The Ministry should further include in its guidance a provision encouraging entities to prepare and disclose “citizen budget reports” and to make use of social media platforms such as Zalo and Facebook for disseminating budgetary information.

Recommendations to the State Treasury

- The State Treasury should support the Ministry of Finance in designing disclosure templates that are compatible with the TABMIS system and allow for efficient extraction of budget data.
- The State Treasury should also ensure that budget-using entities have timely and convenient access to TABMIS, thereby enabling compliance with disclosure requirements.

Recommendations to People’s Councils at Provincial and Commune Levels

- People’s Councils should strengthen the fulfilment of their obligations and responsibilities as elected bodies. Beyond publishing oversight plans, the results of oversight activities should also be disclosed in a complete and detailed manner. People’s Councils should intensify their monitoring of the compliance of agencies and units within their mandate with budget disclosure requirements.
- Deliberations on the implementation and effectiveness of budget disclosure should be systematically incorporated into the regular sessions of People’s Councils.

Recommendations to Provincial People’s Committees and Departments of Finance

- Provincial People’s Committees should direct relevant agencies such as the Departments of Home Affairs, Departments of Finance, and commune-level People’s Committees to conduct a comprehensive review of the human resources currently responsible for financial and planning functions at the commune level. This should ensure that staff are appropriately assigned to positions that match their qualifications and competencies, and that both the number and quality of personnel meet local needs, in line with the guidance of the Steering Committee on Administrative Reorganization and the Establishment of the Two-Tier Local Government Model, as set out in Official Letter No. 09/CV-BCĐ concerning the temporary orientation for personnel allocation (dated 30 May 2025).
- Provincial Departments of Finance should advise Provincial People’s Committees to design and implement training and capacity-building programs for commune-level finance officers, with priority given to budget accountants, in line with Conclusion No. 179/KL/TW of the Politburo and Secretariat on strengthening the organization and functioning of the two-tier local government model.

- Adequate resources should be allocated for the development and improvement of electronic portals of provincial and commune-level governments. Depending on local conditions, budget disclosure sections may be placed on the provincial government's portal or on commune-level portals.

Recommendations to the Viet Nam Fatherland Front

- The Viet Nam Fatherland Front should strengthen the fulfilment of its mandate and responsibility to lead social supervision and critique with regard to state budget information. It should provide guidance to, and promote the active involvement of, its member organizations in monitoring the exercise of citizens' rights and obligations concerning the disclosure and transparency of budgetary information by agencies and budget-using entities.
- It is necessary to integrate the content and results of the monitoring of budget disclosure implementation, along with an assessment of the current state of budget disclosure, into consolidated reports on voters' opinions and recommendations submitted to the National Assembly or the People's Councils at provincial and commune levels via the Vietnam Fatherland Front.

Recommendations to the Ministry of Home Affairs

- The Ministry of Home Affairs should work with relevant ministries in developing guiding documents on the management and access to archived information and data, including budgetary information, previously disclosed on the portals of pre-merger entities, to allow efficient and effective use of archived resources.
- The Ministry of Home Affairs should monitor local governments' budget disclosure by integrating this indicator in the Public Administration Reform (PAR) Index.

3. Further discussion

The study also has certain limitations. The scope of fieldwork was limited to three localities (Dien Bien Province, Lang Son Province and Ho Chi Minh City) and does not fully reflect the diversity of the 34 provinces and municipalities. In addition, as the survey took place only one month after the consolidation, some procedures and practical models were still being finalized, making it premature to draw long-term assessments.

Therefore, subsequent studies should pursue the following directions: (i) expand the scope of fieldwork to more localities, particularly provinces in the Central region and the Central Highlands, where infrastructure constraints coexist with ethnic diversity; (ii) assess the long-term impact of the two-tier local government model on transparency and citizen participation; (iii) compare budget disclosure practices across localities to draw lessons and propose appropriate reforms through the development of a toolkit and indicators for assessing budget disclosure at the level of communes, wards and special administrative units under provinces and municipalities.

This study shows that budget disclosure in the context of the two-tier local government model presents both challenges and opportunities. If institutional, information and infrastructure gaps are addressed, Viet Nam can turn this round of administrative reforms into a catalyst to enhance grassroots democracy, strengthen accountability and, most importantly, consolidate public trust and meaningful citizen participation in the state budget process. This is also the key to realizing the goal of building an open, transparent and inclusive system of governance consistent with the spirit of “leave no one behind” in the country’s development process.

References

- CECODES, RTA & UNDP (2025). *The Viet Nam Provincial Governance and Public Administration Performance Index (PAPI): Evidence from Citizens' Experiences in 2024*. Joint Policy Research Report by the Centre for Community Support and Development Studies (CECODES), Real-Time Analytics (RTA), and the United Nations Development Programme (UNDP). Hanoi, Viet Nam.
- IBP & CDI (2024). *Open Budget Index (OBI) 2023: Viet Nam Results*. Retrieved on 5 May 2025 from: <https://cdivietnam.org/wp-content/uploads/2024/07/Bao-cao-OBI-2023-Vietnam-final-1.pdf>
- VESS & CDI (2024). *Provincial Open Budget Index 2023: Measuring Local Budget Disclosure*. Retrieved on 5 May 2025 from: <http://ngansachvietnam.net/wp-content/uploads/2020/08/BA %CC percent81O-CA %CC percent81O-POBI-2023-1.pdf>
- VESS, CDI & UNDP (2023). *Research on Policies and Practices of State budget publicity and Citizen participation in Budget process*. A Joint Policy Research Paper on Governance and Participation commissioned by the Budget Transparency, Accountability and Participation Coalition (BTAP), including the Vietnam Center for Strategic Economic Studies (VESS) and the Center for Development and Integration (CDI); and the United Nations Development Programme (2023). Hanoi, Vietnam: September 2023
- VESS, CDISE & UNDP (2024). *Review of district budget disclosure in 2023 and A case study of budget disclosure in public educational institutions in Lang Son and Ba Ria-Vung Tau provinces*. A Joint Policy Research Paper on Governance and Participation commissioned by the Viet Nam Center for Strategic Economic Studies (VESS), Center for Development and Integration Social Enterprise (CDISE), and the United Nations Development Programme (2024). Hanoi, Viet Nam: November 2024
- VESS & CDI (2022). *The 2021 Ministry Open Budget Index (MOBI): Measuring Budget Disclosure by Budgetary Units and State-Supported Entities*. Retrieved on 5 May 2025 from: <http://ngansachvietnam.net/wp-content/uploads/2019/06/Bao-cao-Mobi-2021.pdf>



Co-implementing agencies



Co-sponsoring agencies



Ireland





**Viet Nam Center for
Economic and Strategic Studies**

7th Floor, TMC Building,
No. 1 Luong Yen,
Hai Ba Trung Ward, Hanoi
T: (+84) 97 560 8677
E: info@vess.org.vn
W: vess.org.vn



**Center for Development and
Integration Social Enterprise**

No. 3/29/1099 Bat Khoi Street,
Village 4, Bat Trang Commune,
Hanoi
T: (+84) 91 216 5677



UNDP VIETNAM

304 Kim Ma, Ngoc Ha Ward,
Hanoi
T: (+84) 4 38500 100
F: (+84) 4 3726 5520
E: registry.vn@undp.org
W: undp.org/vietnam

