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THE DELIBERATE FOG

The Information Architecture of Institutional Opacity

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PRÉCIS

MDB Reform Advisory was established in 2023, shortly after the author completed twenty years of service at the World Bank as a Country Manager and Lead Governance Specialist. In 2024, more than twenty-five formal Access to Information requests were submitted seeking data to underpin independent accountability analysis. The Bank refused consolidated ISR access on the grounds that providing it would require "creating information that does not already exist" — information that exists on every task team leader's dashboard. This note documents what that refusal reveals about the World Bank's public information architecture.

SIX DOCUMENTED GAPS
GAP 1 Project cost data: Project Volume encoded in five broad bands. No actual commitment amount, disbursement, preparation cost, or supervision cost. A \$105M project and a \$3B project are indistinguishable.
GAP 2 Project preparation costs: No public dataset of preparation costs, staff weeks, or projects prepared but never approved. The true cost of the lending pipeline cannot be assessed externally.
GAP 3 Knowledge products (ASA): No consolidated public dataset of ASA activities, costs, or outcomes. The Bank spends approximately \$1 billion annually on advisory services with no public evaluative framework.
GAP 4 ISR portfolio access: ISRs exist for every active project and are available internally in consolidated, filterable form. Externally accessible only project by project. A formal A2I request was refused on the grounds of "creating information that does not already exist."
GAP 5 Board compensation: ED salaries set by annual Board of Governors resolution buried in documents portal. Pension opt-in/out not disclosed. No consolidated Board compensation statement in any published financial report.
GAP 6 Doing Business investigation Phase 2: Never completed or released. The Bank discontinued the report entirely rather than publish Phase 2 findings. A formal A2I request produced four Phase 1 links and a closed case.

I. THE INSIDER–OUTSIDER CONTRAST

MDB Reform Advisory was established in 2023, following the author's completion of twenty years of service at the World Bank as a Country Manager and Lead Governance Specialist, including a final posting as Lead Governance Specialist for West Africa. The platform was set up specifically to provide independent empirical analysis of the World Bank Group — drawing on the same project-level data the author had used throughout his career.

The experience that followed was revealing. As an insider, the data needed to analyse portfolio performance — project costs, supervision records, outcome ratings, country pipelines — was available on screen, consolidated, filterable, and updated in real time. The moment that insider status ended, the information wall went up.

In 2024, more than twenty-five formal Access to Information requests were filed seeking the data to underpin the analytical work of this platform. The starting point for this note is a specific recent example: the IEG ratings dataset released on 24 June 2026. Although the note begins with that dataset, the argument concerns the broader design of the Bank's public information architecture rather than a single publication.

✓ INSIDE THE BANK (INTRANET)	✗ OUTSIDE THE BANK (PUBLIC)
Country portfolio — 1 click	Country portfolio — Not available
Active projects — 1 click	Active projects — Project by project
ISRs (portfolio view) — 1 click	ISRs (portfolio view) — Not available
Supervision history — 1 click	Supervision history — Project by project
Financial data — 1 click	Financial data — Multiple disconnected systems
ASA portfolio — 1 click	ASA portfolio — No public dataset
Pipeline — 1 click	Pipeline — Registered projects only
Dashboards — 1 click	Dashboards — Not available

Functional transparency means an external researcher can answer in minutes what a Bank staff member can answer in seconds. By that standard, the World Bank's public information architecture does not deliver functional transparency.

II. WHAT THE PUBLIC INFORMATION ARCHITECTURE DOES NOT PROVIDE

Before examining specific gaps, it is worth naming the structural issue. The World Bank has built a document architecture rather than a data architecture. A document architecture makes individual reports, appraisals, and evaluations available. A data architecture would make the underlying information machine-readable, consistently organised, and linked across lending, supervision, preparation, and evaluation so that independent researchers could analyse institutional performance without reconstructing the database from thousands of individual files. The IEG ratings dataset is a partial exception — it is a genuine data product. What surrounds it is not.

The single most important variable for any cost-effectiveness assessment is absent. The "Project Volume" column encodes loan size in five broad bands rather than the actual commitment amount. There is no column for actual disbursements, no column for total cost to the borrower, and no column for supervision costs. A researcher cannot calculate cost per satisfactory project, cost per output delivered, or return on World Bank dollar without going elsewhere — and elsewhere is not a public spreadsheet.

Project preparation costs are not published. The dataset contains no preparation cost column, no preparation time column, and no record of projects that were prepared but never approved — a category that would reveal the true cost of the pipeline.

The Bank produces hundreds of Analytical and Advisory Activities each year. There is no publicly accessible register of what was produced, at what cost, or with what demonstrable effect. The ASA transparency gap reflects institutional decisions about what information is made publicly available.

ISRs are the primary instrument for tracking how active projects are performing. They exist for every disbursing project, updated twice yearly, and are available to Bank staff in consolidated, filterable form — a country portfolio is one click away on the intranet. Externally, they can be found only by navigating to individual project pages. Reconstructing what any Bank staff member can see in one click requires an external researcher to visit hundreds of individual project pages manually. The information is identical. The accessibility is not.

Executive Director salaries are set annually by Board of Governors resolution, findable only if one knows to search the documents portal. Pension arrangements are not publicly disclosed. No consolidated statement of Board compensation costs appears in any published financial report. An institution that advises member governments on board disclosure standards does not apply those standards to its own governing body.

When data manipulation in the Doing Business report was revealed in 2021, the Bank commissioned an investigation. Phase 1 was published. Phase 2, understood to cover earlier years and potentially additional officials, was never completed or released. Had Phase 2 been completed, it could have clarified whether the identified problems were isolated incidents or reflected broader institutional weaknesses in data governance — a question that remains unanswered.

III. THE DOCUMENTARY RECORD

These gaps are not inferred. They are documented in a formal correspondence record spanning June–August 2024.

In June 2024, a request was submitted to the Bank's documents team for bulk PDF access to Project Appraisal Documents and Implementation Completion Reports for the Bank's full evaluated portfolio. No substantive response was received despite a follow-up ten days later noting that a promised data scientist had never made contact and that bulk downloads were essential for the research to proceed.

In early July 2024, those requests were filed formally under the Bank's A2I process. The responses are instructive.

CASE AI9261 · BULK DOCUMENT ACCESS
Request for bulk PDF access to PADs, ICRs, ICRRs, and ISRs

BANK RESPONSE
The Bank directed the requester to its Advanced Search portal and advised downloading an Excel spreadsheet of search results — not the documents themselves — and clicking through individual project pages. No bulk download facility was acknowledged to exist.

CASE AI9270 · ISR AND PORTFOLIO DATA · RESPONSE: 29 AUGUST 2024
Requests S2407-5433, S2407-5437, S2407-5438 — formally refused

BANK RESPONSE
"Your requests require the World Bank to create, develop, or collate information or data that does not already exist or are not available in the World Bank's records management system. Thus, pursuant to the provision below, your request is hereby refused and will be closed on this basis."

This position is difficult to reconcile with the Bank's operational systems, where ISRs are routinely used to monitor active portfolios by every task team leader, Regional VP, and management dashboard in the institution. The information is not missing — it is not assembled for external users.

CASE AI9272 · BOARD COMPENSATION
Request S2407-5435 — Board of Directors remuneration and pension arrangements

BANK RESPONSE
Two links provided: the Board of Directors webpage listing current Executive Directors, and the policies page for regulations relating to EDs and Alternates. No salary figures, pension terms, or total compensation costs disclosed. Case closed.

CASE AI9271 · DOING BUSINESS INVESTIGATION
Request S2407-5434 — Phase 2 of the Doing Business investigation

BANK RESPONSE
Four links to Phase 1 documents already in the public domain. A suggestion to email doingbusiness@worldbank.org. No information on Phase 2 provided. Case closed.

IV. THE ARCHITECTURE OF OPACITY

None of the individual omissions described above is accidental. Each represents a decision point at which an institution that genuinely prioritised external accountability would have chosen differently. Taken together, they constitute an information architecture whose cumulative effect is to make independent cost-effectiveness analysis extraordinarily difficult.

A useful test of functional transparency is this: if Bank staff can answer a portfolio question in one minute using internal systems, while an external researcher requires days of manual reconstruction to answer the same question, the institution has not achieved meaningful transparency. It has achieved legal compliance. The two are not the same. Transparency should be judged by the ease with which an independent researcher can answer legitimate questions — not simply by whether individual documents can eventually be found somewhere on a website.

> *The ISR refusal is the clearest illustration. The Bank did not say the information was confidential. It did not say disclosure would harm member countries. It said that consolidating its own supervision records for an external user would require creating information that does not exist. This position is difficult to reconcile with the Bank's operational systems, where ISRs are routinely used to monitor active portfolios.*

The IEG ratings dataset is real and useful. It is also carefully bounded. It tells a researcher whether a closed project was rated Satisfactory. It does not tell them what the project cost to prepare, what it cost to supervise, what the Bank's internal systems say about projects still disbursing, what the institution spent on knowledge work that produced no evaluable output, what the governing Board costs its member countries in total compensation, or what an investigation into data manipulation actually found.

The gap between what is disclosed and what would be needed for genuine accountability is not a data management problem. It is a governance problem.

The World Bank is the largest single source of development finance for low-income countries. Its accountability architecture — inspection panels, IEG, the Access to Information Policy — is structured to give the appearance of transparency while preserving management's ability to control what the public can see and analyse.

The issue is therefore not whether the information exists. It plainly does. The issue is whether the institution has designed its public information architecture to permit meaningful external scrutiny. The documentary evidence assembled here suggests that it has not.

MDB Reform Advisory *publishes empirical analysis of World Bank Group, IFC, MIGA, IMF, and regional MDB governance and accountability. All papers are available at* mdbreform.com*. Contact:* pbrar@mdbreform.com

Sources: IEG ICRR/PPAR Ratings Dataset (June 24, 2026); World Bank Access to Information correspondence (June–August 2024); IBRD By-Laws (as amended through May 17, 2021); IBRD Board of Governors Resolution No. 704 (August 2024); World Bank Staff Rules 06.20; World Bank Access to Information Policy Directive/Procedure.