MANAGEMENT IMPLEMENTATION PLAN FOR THE IEO EVALUATION OF THE IMF'S EXCEPTIONAL ACCESS POLICY

October 3, 2025

EXECUTIVE SUMMARY

This Management Implementation Plan (MIP) follows the Independent Evaluation Office (IEO)'s report on the IMF's Exceptional Access Policy (EAP). It proposes actions in response to the report's recommendations that were endorsed by the IMF's Executive Board. The Board-endorsed recommendations were to: (i) conduct a dedicated review of the EAP; (ii) emphasize sound program design as a safeguard in exceptional access cases; (iii) address technical gaps in the exceptional access criteria (EAC); (iv) strengthen procedures for risk mitigation and learning; and (v) reinforce the coherence between the EAP and the IMF's enterprise risk management policy.

To address the Board-endorsed recommendations, the MIP proposes to leverage existing and planned workstreams that have been approved by the Board. The short-term actions highlight key principles that will guide the EAP review. These include assessing program design and providing recommendations for enhancing effectiveness, including of exceptional access programs, as part of the ongoing Review of Program Design and Conditionality (ROC); issuing clearer guidance on political assurances, communications, and early and regular informal consultations with Executive Directors in exceptional access cases; improving the staffing process of ex-post evaluations; and clarifying expectations for enterprise risk management. A dedicated review of the EAP, which will cover the remaining recommendations, is planned to be launched after the ROC is concluded.

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INTRODUCTION

1. **The Executive Board welcomed the IEO evaluation of the IMF's Exceptional Access Policy (EAP).**[1] Directors recognized that the Fund has sought to find a generally good balance between rules and flexibility in applying the EAP, while reinforcing transparency and accountability and adopting adequate safeguards. They generally concurred with the thrust of the evaluation that the EAP provided a structured framework for higher scrutiny through the exceptional access criteria (EAC) and enhanced decision-making procedures, while maintaining flexibility through room for judgment in assessing the EAC. They also generally considered that, in the context of the large systemic shocks of the past two decades, the EAP served to provide a valuable framework for handling exceptional access (EA) requests in a structured manner.

2. **This Management Implementation Plan (MIP) seeks to take forward the Board-endorsed recommendations.** It identifies a set of short-term actions that would enhance the effectiveness of the EAP ahead of a dedicated review, and act as interim and complementary steps without front-running the EAP review itself. In doing so, it leverages existing and planned workstreams, particularly the Review of Program Design and Conditionality (ROC). It also defines the scope of the EAP review to address the remaining recommendations. The implementation of the full package will ensure that the EAP remains fit for purpose in an evolving global context.

MANAGEMENT IMPLEMENTATION PLAN

3. **With the EAP being a part of the IMF's broader lending policy framework, several issues raised are not limited to the EAP but are of more general applicability.** For instance, and as discussed in more detail below, program design and conditionality for Upper-Credit Tranche (UCT) quality programs are critical safeguards for all programs, both EA and normal access (NA). Likewise, the need to elaborate on principles to guide the assessment of authorities' political and institutional assurances regarding the implementation of programs are common to EA and NA programs, even if higher access calls for higher safeguards. The role of communications and, specifically, the fact that authorities' communication ultimately speak to ownership are pertinent to all Fund-supported programs.

4. **Consequently, the MIP addresses actions to enhance the effectiveness of the EAP in the short term, to be followed by a dedicated EAP review.**

- *The MIP identifies synergies with existing and planned workstreams that will be leveraged to address the IEO's recommendations.* Such an approach is mindful also of resource constraints. This MIP reviews ongoing efforts and proposes concrete and pragmatic actions to fulfill the recommendations endorsed by the Board. While most of these actions are planned for

[1] The evaluation was discussed by the Board on December 5, 2024. See the Chair's Summing Up.

implementation by the 2026 Annual Meetings, the dedicated review of the EAP will take longer reflecting existing commitments and the need to properly sequence the workstreams.

- *The MIP also delineates the scope of the EAP review.* Careful consideration is needed to analyze some suggestions including, for example, the proposed re-introduction of an exceptional circumstances (EC) clause. With the intention of not frontrunning the EAP review, the MIP elaborates on key questions that the review could address while not taking a stance on the different issues.

5. **The short-term actions highlight key principles that will guide the EAP review.** These include: the critical role of program design to ensure success, adequate and timely information sharing with the Board, the importance of sound communication, addressing the perception of heterogeneity of treatment in the assessment of political assurances, the central role of EPEs as a vehicle to increase accountability and learn lessons, and ensuring coherence across Fund policies.

A. Recommendation 1: Exceptional Access Policy Review[2]

The Fund should conduct a dedicated review of the EAP and schedule subsequent reviews on a regular basis. EAP reviews should take due account of strategic considerations, including the adequacy of existing access limits and the balance between rules and flexibility within the policy.

Executive Board Response

6. **Directors agreed with Recommendation 1 to conduct a dedicated review of the EAP**. A few directors emphasized that this review should not discard upfront any of the recommendations of the IEO. Directors also agreed that subsequent reviews should be scheduled on a regular basis to ensure the policy remains fit for purpose in an evolving global context. They generally agreed that the reviews should take due account of strategic considerations, including access limits and the balance between rules and flexibility within the policy. Directors also noted the benefits of including Poverty Reduction and Growth Trust (PRGT) exceptional access and high combined PRGT and GRA credit (HCC) exposure cases in the review's scope. They emphasized the need for flexibility in the timing and format of reviews, especially given the likely resource intensiveness of the next comprehensive review. They looked forward to additional discussion on how best to fit the next review in the Board's work program. Most Directors were open to careful consideration in the next EAP review of the possibility to reintroduce an EC clause for rare and well-justified cases when strategic or political considerations may call for decisions on EA program that fail to meet the EAC. At the same time, many Directors expressed reservations about this proposal. They stressed the need to take into account risks that the EC could stigmatize programs where applied and raised concerns about evenhandedness and transparency in the Fund's lending policies.

[2] See Annex II on the specific steps identified by the IEO.

Implementation

7. **The Fund will conduct a dedicated review of the Exceptional Access Policy.** The IEO recommended that staff review the EAP to ensure its relevance and effectiveness in meeting the policy's objectives in a changing global environment. As highlighted in the IEO report, the EAP is interwoven with several other IMF policies and guidance that govern program design and conditionality, financing assurances, and risk management. The scope of the EAP review will be broader than the IEO's evaluation, encompassing also exceptional access arrangements under the PRGT and HCC frameworks in light of the 2024 PRGT Review.

8. **The EAP Review will be undertaken after the ROC.** The ROC aims to ensure that program design and conditionality—across EA and NA programs—are well suited to help the Fund's members resolve their balance of payments challenges and restore medium-term external viability. In doing so, the ROC will seek to learn from successful program engagements and to highlight the contributions of timely and sustained policy actions. These lessons will also apply to the EAP review, providing a roadmap for enhancements in program design. The timing of the EAP review will require careful sequencing to leverage insights from the ROC and related work.

9. **Subsequent EAP reviews are expected to occur regularly, with flexibility as circumstances warrant.** A dedicated review of the EAP was conducted in 2004, and significant changes to the EAP policy were adopted in 2009, 2010, and 2016 based on in-depth staff papers. Regular reviews would typically be expected to occur every seven years, albeit with flexibility to move them forward or backward as may be required.

B. Recommendation 2: Program Design in Exceptional Access Cases

The Fund should clarify the fundamental role of sound program design in providing higher safeguards in EA cases relative to NA. Program staff reports should provide justification for the policy choices and trade-offs embedded in program design and how they support reasonably strong prospects for program success, including the authorities' political and institutional capacity to implement the program. Related risks should be clearly disclosed to the Board.

Executive Board Response

10. **Directors broadly agreed with Recommendation 2 to clarify the fundamental role of sound program design in providing higher safeguards in EA cases relative to NA programs.** Directors strongly agreed on the importance of sound program design and strengthening justification for policy choices and trade-offs. In that regard, they saw merit in the evaluation's recommendation to strengthen the justification of program design and its consistency with reasonably strong prospects of program success (EAC4) and adequate safeguards in EA cases. They emphasized that all EA and NA programs should remain subject to a single, common Upper Credit Tranche (UCT) quality standard. Directors also generally agreed that additional rigor in assessments should not come at the expense of practical applicability across heterogeneous situations, given differing forms of institutional and political capacity and commitment. Directors agreed to build on

ongoing staff efforts to provide clearer guidance for assessing political assurances in the run up to elections for Fund-supported programs in order to enhance the assessment of institutional capacity, including leveraging advice in the Operational Guidance Note (OGN) on Program Design and Conditionality. Directors agreed on the importance of disclosing risks to the Board and of guidance on public communications in EA cases.

Implementation

11. The ROC will provide an in-depth assessment of IMF-supported program design and recommendations for enhancing effectiveness, including of EA cases. IMF-supported programs are designed to help members address balance of payments problems and achieve medium-term external viability, thus providing adequate safeguards for the use of Fund resources. This is referred to as the UCT standard and it applies to all IMF-supported programs with access above 25 percent of a member's quota, including those with exceptional access. The discussions on the ROC will offer an opportunity to Executive Directors to weigh-in on aspects that pertain to the design of EA programs. Upon completing the ROC, staff will revise the OGN, to reflect operational guidance that will also apply to EA cases.

12. As an interim step, staff will prepare additional guidance on EA notes. The guidance will formalize the current practice of longer-than-required circulation period to the Board and clarify the expectation that EA notes be circulated generally one week but no less than two days in advance to give Executive Directors' offices time to discuss critical issues with their capitals. The updated guidance will also encourage teams to provide a more candid assessment of the rationale for seeking exceptional access and on the role of key elements, such as phasing and pace of adjustment, to ensure reasonably strong prospects of program success and adequate safeguards. This clarification would be reflected in the next update of the Compendium of Executive Board Work Procedures, and the updated guidance more generally would be reflected in the OGN.

13. Staff will also develop clearer guidance on the modalities for assessing political assurances in IMF-supported programs, including for EA cases. Assessing political assurances in the run-up to elections is an important part of the broader assessment of political and institutional capacity to deliver on IMF-supported program commitments (EAC4). This guidance to staff will expand on Annex M of the OGN and apply to all UFR cases. This guidance will be circulated to staff via a memo from Management and integrated into subsequent updates of the OGN.

14. For each new EA case, a robust communications plan will be prepared in line with current best practices. The area department and the communications department will discuss the communications strategy at an early stage during the preparation of the EA note, maintaining due confidentiality. The effectiveness of the communications plan will ultimately hinge on the authorities' ownership of the IMF-supported program and the extent to which there is close coordination between the Fund and the authorities on communications.

15. Actions to strengthen Exceptional Access Criteria 4 (EAC4) will be informed by the findings of the EAP Review. The suggestion in the IEO evaluation to refocus EAC4 and prioritize it within the list of criteria will need to be discussed in the review, as the criteria do not currently follow a hierarchical structure. Even so, the EAP review will consider ways to enhance effectiveness and leverage the recommendations of the ROC to improve the prospects of program success (which underpins EAC4).

C. Recommendation 3: Exceptional Access Criteria

To address technical gaps in the EACs, facilitate better alignment with the policy's objectives, and enhance evenhandedness the Fund should (i) increase the level of scrutiny for access decisions; (ii) clarify expectations when debt is in the "gray zone," revisit its terminology to strengthen signaling, and clarify the distinct roles of the different types of debt and creditors for debt sustainability; and (iii) develop consistent analytical guidance to assess market access prospects.

Executive Board Response

16. Directors generally agreed with Recommendation 3 to address technical gaps in the EAC to facilitate better alignment with the EAP's objectives and further ensure evenhandedness. They agreed that a review of the EAP should assess options to increase the effectiveness of the EAC. Directors broadly supported the IEO's recommendation to increase the level of scrutiny of access decisions (EAC1) for cases with debt in the gray zone—when debt is sustainable but not with high probability. Most Directors also agreed on the need to clarify expectations when debt is in the gray zone, revisit its terminology to strengthen signaling, and clarify the distinct roles of different types of debt and creditors (EAC2). However, some Directors also called for thorough reflection to assess whether tightening EAC2 could raise the prospects of deeper debt restructurings, in turn diminishing prospects for fulfilling EAC3. Directors generally concurred that more consistent forward-looking guidance should be developed to support assessments of market access prospects (EAC3). At the same time, some Directors cautioned on the need to consider the usefulness and resource implications of developing additional analytical frameworks to achieve these aims, given the inherent limitations of any framework that seeks to reliably gauge market access prospects and the role of judgment in Fund lending decisions.

Implementation

17. The effectiveness of Exceptional Access Criteria will be evaluated during the EAP Review. As discussed in more detail in the following section, a thorough review of the existing framework including the list of criteria, their application, and assessment will be conducted during the forthcoming EAP review.

18. The assessment of the effectiveness of the framework should consider not only the EA cases that proceeded but also those that did not go forward because the EAC were not met. A counterfactual analysis may not be feasible. However, staff notes that the EAC framework has served as a useful guardrail in cases where higher safeguards were not met.

D. Recommendation 4: Exceptional Access Policy Procedures and Ex-Post Evaluations

The Fund should strengthen the application of the EAP's enhanced procedures and adopt measures to better leverage EPEs for risk mitigation, accountability, and learning.

Executive Board Response

19. Directors supported Recommendation 4 to strengthen the application of the EAP's enhanced procedures and adopt measures to better leverage Ex-Post Evaluations (EPEs) for risk mitigation, accountability, and learning. Enhanced procedures include early and regular informal consultation with Directors, while preserving management and staff's flexibility in program discussions and respecting authorities' prerogatives. Directors agreed to strengthen EPEs by implementing procedures that facilitate more systematic follow up while enhancing transparency of the process and ensuring adequate independence of EPE leaders and teams, including by having a roster of EPE leads and the formation of an interdepartmental review group.

Implementation

20. Management and staff welcome the recognition that the EAP procedures have provided a higher level of engagement in EA programs than in NA programs. As a short-term action, staff will aim to enhance information sharing with the Board while recognizing that consultations with the Board occur while negotiations are ongoing. As a result, it may not always be feasible to disclose certain confidential details of a program including access levels at that stage. In the medium term, and in line with the implementation of Recommendation 5, staff will seek to ensure that the EAP procedures allow for appropriate risk-based decision-making by the Board within the Fund's established risk tolerance in lending.

21. Management will issue guidance on early and regular informal consultation with the Executive Board in Exceptional Access cases. The guidance will clarify expectations for early and regular consultation while also retaining needed flexibility for Management and staff in determining the format, timing, and content of those consultations. The guidance will initially be circulated as a Memorandum from Management to staff, and subsequently codified in the OGN.

22. The Guidance Note (GN) on EPEs will be revised to ensure more systematic follow-up of EPEs. In the short term, the revised GN will clarify the expectations for stand-alone Board meetings for EPEs and for EA Notes associated with a successor EA program request to discuss how the prior EPE has informed program design. The GN will also clarify the expectation that the EPE articulates the role of program design and idiosyncratic events in program performance. Following the completion of the EAP Review, the GN on EPEs would be updated and subsequently integrated into the OGN on Program Design and Conditionality.

23. Management will issue guidance on the staffing and review process of EPE. Staff will create an interdepartmental roster of staff qualified to serve as EPE leads and senior reviewers.

Revisions to the EPE GN will clarify the composition of the rosters, and the selection process for and responsibilities of EPE leads and senior reviewers, with the latter assuming joint sign-off responsibility with SPR and the area department in the review process for EPEs. To ensure adequate independence of EPE leaders and reviewers, the selection process is expected to combine mechanically drawing multiple candidates from the roster with selection by the Review Committee and/or the Senior Review Committee.[3]

E. Recommendation 5: Enterprise Risk Management

The Fund should establish greater coherence between the EAP and the IMF's ERM policy. It should seek to ensure a common institutional understanding of how the EAP serves to mitigate enterprise risks consistently with the Fund's risk tolerance in lending.

Executive Board Response

24. Directors concurred with Recommendation 5 that the Fund should establish greater coherence between the EAP and the Fund's Enterprise Risk Management (ERM) framework, ensuring common institutional understanding of how the EAP mitigates enterprise risks consistently with the Fund's risk tolerance in lending. Directors recognized the importance of timely risk disclosures to the Board and continued progress to enhance risk analysis in program documents, including further leveraging recently introduced Enterprise Risk Assessments. Mindful that primary responsibility remains with area departments in close consultation with review departments, a number of Directors considered that the Office of Risk Management could gradually be given greater responsibility over financial risk supplements in EA program documents.

Implementation

25. The EAP and ERM are designed with different, albeit complementary, objectives in mind. The EAP specifies clearly-defined criteria to strengthen safeguards in cases of higher access, ensure uniformity of treatment of members, and help shape expectations of members and the markets.[4] The ERM looks at a broad range of factors to inform overall risk management and leverages a common taxonomy and risk ratings scale to facilitate enterprise-wide assessments.[5]

26. The EAP review will clarify the role, if any, of risks beyond financial ones in informing EA decisions.[6] The Articles of Agreement require that the Fund adopts policies on the use of its

[3] The selected candidate would be offered the assignment but would not be obliged to accept it. When the selected candidate is unavailable, the assignment would be offered to another candidate among those drawn.

[4] See the 2002 Summing Up on EAP (BUFF/02/159) and the Board papers on Access Policy in Capital Account Crises (2002) and "Access Policy in Capital Account Crises—Modifications to the Supplemental Reserve Facility (SRF) and Follow-up Issues Related to Exceptional Access Policy" (2003).

[5] See Enterprise Risk Management Policy, Framework, Road Map and Risk Tolerance (SM/22/206), Rev, 1, e.g., Executive Summary, paragraph 26.

[6] Whether potential modifications to the ERM policy are also warranted to ensure coherence could be considered in a future regular review of the ERM policy.

general resources that will (1) "assist members to solve their balance of payments problems in a manner consistent with the provisions of the Articles of Agreement" and (2) "establish adequate safeguards for the temporary use of Fund resources"[7]. As stated in the Fund's ERM policy, for lending, the Articles set a floor on risk tolerance as all GRA lending is subject to requirements of adequate safeguards.[8] In line with these requirements, Fund decisions give primacy to safeguarding Fund resources. At the same time, the IEO evaluation proposed the reinstatement of the EC clause in rare, well-justified cases, where strategic or political considerations may call for decisions on EA on programs that do not meet all of the EAC. Other alternatives could also be considered as outlined in the next section. The EAP review will analyze the IEO's proposal, and any associated risks, and assess whether the EAP and the ERM policy are coherent on key aspects, and whether enhancements to the EAP policy are warranted.

27. Meanwhile, the ERM operational guidance note clarifies the requirements for inclusion of enterprise risk assessments in country operational papers, including in documents on EA financing. The operational guidance note recognizes that responsibility for risk assessments and treatments is owned by first line departments and provides guidance for the inclusion of enterprise risk assessments (ERA) as an annex to EA notes prepared for informal Board consideration. An ERA is expected in UFR cases raising major or critical enterprise risks and updates at least annually and earlier if warranted by major changes in the risk assessment. These annexes would serve as the basis for the ERA accompanying the final staff report. Early engagement with SPR in UFR cases (and ORM in major or critical cases for support on the application of ERM) ahead of the formal review process would facilitate prioritization and the discussion can focus on the identification of risks, risk ratings, and likely impact. Any unresolved differences of view regarding challenges to the final assessment (including DRSA ratings, where a DRSA is judged relevant) would be handled as part of the normal review process.

PRELIMINARY SCOPE OF THE EAP REVIEW

28. The key objective of the review will be to ensure that the EAP provides the Fund with appropriate safeguards against additional risks inherent in programs with higher access to Fund resources. The EAP provides a decision-making process based on a rigorous examination of risks to the proposed program. However, much has happened in the global economy since the last modification to the policy in 2016. These changes warrant a thorough analysis of which elements of the EAP remain valuable and which ones should be changed to ensure the policy remains fit for purpose. This section outlines some broad, preliminary questions that could guide the review.

[7] Article V, Section 3(a).

[8] See SM/22/206, Revision 1, Fn. 8.

Focus

29. The review will cover the experience under the EA GRA and PRGT frameworks, and under the PS-HCC framework. While the IEO evaluation focused only on the GRA framework, ongoing PRGT and blended EA arrangements and the recent Review of the PRGT Facilities and Financing warrant a closer look at all EA and HCC cases. The review would also look into assessing additional policy dimensions, including the coherence across the three frameworks (PRGT EA, GRA EA, and HCC) and the measurement of market access within each.

The EAC Framework

30. Trade-offs between rules and flexibility. There is a broad understanding that the current framework based on objective criteria was an improvement over the previous practice based on discretion. Building on this consensus, the review will investigate the following proposals.

- *Possible reintroduction of an EC clause.* The review will analyze the merits and drawbacks of reinstating the EC clause, which the IEO evaluation recommended to consider in rare and well-justified cases when not all EAC criteria are met. At the same time, Management cautioned that its use could stigmatize countries for which the clause is applied, undermining the catalytic role and success of the program.

- *Assessment of EAC3 and EAC4.* The assessment of the third and fourth criteria is binary, unlike the probabilistic approach of EAC2. Alternative ways to assess the criteria could be explored as part of the review, while considering safeguards and coherence issues. For instance, as a preliminary idea, the review could analyze the merits and drawbacks of shifting from a binary assessment to a graduated approach that could potentially provide the Board with a finer assessment of the prospects and risks associated with the program..

- *Level of safeguards for different access levels.* The EAP also does not consider any limit to the level of access, beyond the normal access limits. The review could further explore the notion that more access should entail higher safeguards, possibly considering further gradation to balance rules and flexibility while guarding against increasing the complexity of the EAP framework. This may or may not need to be in the form of numerical thresholds.

31. Effectiveness of EAC. The review will assess how the rationale and effectiveness of the EAC align with the overarching EAP objectives. It will aim to identify the strengths and limitations of the EAC and examine options for enhancing their effectiveness, including whether certain criteria should be dropped or replaced, while being mindful of the resource implications.

32. Interactions between the criteria. As raised by the IEO evaluation and Directors during the Board discussion, the interaction between criteria, in particular EAC2 and EAC3, should be analyzed. Tightening EAC2 in some cases could lower the likelihood of fulfillment of EAC3 to the extent that it requires deeper debt restructuring. Conversely, concerns about not fulfilling EAC3 could result in excessive reliance on senior credit and unduly delay necessary debt operations.

33. Debt sustainability. The review will seek to clarify the expectations for countries in the gray zone, including the role of different types of creditors and sources of financing (domestic vs. external) in assessing debt sustainability.

34. Market access. The review will clarify the expectations in terms of market access including the expectation of re-accessing domestic and external markets. Consideration could also be given to using debt management conditionality to underpin market access assumptions. The possibility of analytical tools will also be explored. However, two key considerations may limit the ability to develop analytical frameworks. First, market sentiment can be volatile and difficult to model. Second, the resource cost of developing new tools should be weighed against the possible value that these may yield in improving the decision-making process.

EAP Procedures (Risk Disclosure, Communication)

35. Role of judgment. The review will clarify the room for judgment embedded in the framework to increase transparency and ensure evenhandedness.

36. Enterprise Risk Management (ERM). The review will ensure that the residual risks after the application of the EAP are in line with the risk tolerance of the Fund. It will also assess how the application of ERM tools such as DRSA could enhance the presentation of trade-offs.

ENTERPRISE RISK ASSESSMENT

37. The actions in this MIP will help mitigate risks highlighted by the IEO. Specifically, the IEO evaluation found that the EAP has had mixed success in delivering on its objectives, suggesting only limited mitigation of the strategic, financial, operational, and reputational risks associated with higher access. The evaluation also identified process and human capital risks related to gaps in consultation with the Board ahead of staff level agreement and public communications of proposed access levels; limitations in the timeliness, content, and procedures for the materials provided to the Board for the informal sessions; and the limited use made of EPEs and the problems identified in their staffing and clearance procedures which may have inhibited their independence and scope.

- *A dedicated EAP review would help mitigate strategic, financial and business and reputational risks* by enhancing the effectiveness and transparency of the EAC, and thereby the EAP's ability to provide safeguards for higher access. Reviewing the EAP regularly would help ensure that the policy remains relevant and is applied in a uniform manner, helping mitigate strategic, financial and reputational risks in the future.

- *Strategic, financial and business and reputational risks would also be alleviated* by the following actions proposed in this MIP: (i) developing clearer guidance on assessing authorities' political assurances in the run-up to elections , (ii) better leveraging EPEs and strengthening EAP procedures by providing further clarity and transparency in documents and program design, and (iii) preparing communications plans for EA cases early.

- *Ensuring coherence between EAP provisions and the ERM policy would* promote the effectiveness of both policies.

38. There are also operational, reputational, and business risks associated with the actions set out in the MIP:

- Implementing the Board-endorsed recommendations would require managing budget and human capital risks (see below in the *Resource Implications* section).

- Policy changes that would be considered in the EAP review—most notably related to reintroducing the use of the EC clause—could give rise to enterprise risks related to evenhandedness, proliferation of EA cases, adequate safeguards, and reputation. Disclosure of these risks to the Board and development of mitigation strategies would be important.

- Clarifying the role of sound program design in providing higher safeguards in EA cases relative to NA programs may increase incentives for optimistic forecasts and assessments, which would need to be managed.

- Clarifying expectations regarding early and regular informal consultations with Directors in EA cases would necessitate careful management of potential leaks of confidential information, which could give rise to significant reputational, business, and operational risks.

39. Residual risks associated with the EAP and EA programs will remain. EA programs will continue to pose financial risks to the adequacy and liquidity of the Fund's resources. There will always be a level of judgment involved in decisions related to EA programs, including judgments related to the EAC. These judgments and resultant decisions will continue to carry strategic and reputational risks, including with respect to the Fund's credibility and the uniformity of treatment of its members. These risks would be mitigated to be within the Board's approved risk tolerance—but not fully eliminated—by the actions set out in the MIP.

RESOURCE IMPLICATIONS

40. The near-term resource costs are expected to be manageable and could be absorbed into existing budgetary envelopes. The approximate costing of these actions is 0.5 FTEs.

- *Mindful of the tight budgetary situation, the MIP strives to leverage existing and planned workstreams.* As a result, a number of the proposed actions and commitments are already incorporated into current work plans and budgets (e.g., the ROC). Nevertheless, some of the actions which would be taken up as part of planned and ongoing work streams would require work beyond what had been previously envisioned by staff and management.

- *Some of the other proposed actions and commitments to a large extent reflect the alignment of the EAP with current practice* (e.g., early and regular consultation with Directors, stand-alone Board meetings for EPEs, communication strategies for EA cases) and should be relatively low cost. On

EPEs, staff will devise the interdepartmental rosters in a manner that minimizes the resource costs associated with their formation and maintenance and seek to keep the selection processes streamlined while leveraging existing structures.

41. The dedicated review of the EAP and subsequent reviews on a regular basis would need to be adequately resourced, implying additional costs on a forward-looking basis. Given the budgetary situation, these resource implications would need to be factored into work prioritization. The estimated costing of the EAP review stands at approximately 6 FTEs.

Annex I. IEO Evaluation of the IMF's Exceptional Access Policy: Recommendations, Board Responses, and Proposed Follow-Up

IEO Recommendation	Executive Directors' Responses	Follow-Up Plan	Accountability
Recommendation 1. Exceptional Access Policy Review: The Fund should conduct a dedicated review of the EAP and schedule subsequent reviews on a regular basis. EAP reviews should take due account of strategic considerations, including the adequacy of existing access limits and the balance between rules and flexibility within the policy.	Directors agreed with Recommendation 1 to conduct a dedicated review of the EAP. A few directors emphasized that this review should not discard upfront any of the recommendations of the IEO. Directors also agreed that subsequent reviews should be scheduled on a regular basis to ensure the policy remains fit for purpose in an evolving global context. They generally agreed that the reviews should take due account of strategic considerations, including access limits and the balance between rules and flexibility within the policy. Directors also noted the benefits of including PRGT exceptional access and high combined PRGT and GRA credit exposure cases in the review's scope. They emphasized the need for flexibility in the timing and format of reviews, especially given the likely resource intensiveness of the next comprehensive review. They looked forward to additional discussion on how best to fit the next review in the Board's work program. Most Directors were open to careful consideration in the next EAP review of the possibility to reintroduce an Exceptional Circumstances (EC)	**EAP Review.** After completion of the ongoing Review of Program Design and Conditionality (ROC), staff proposes to conduct a dedicated Review of the Exceptional Access Policy, with the precise timing duly balanced with any potential projects that could emerge as part of the conclusion of the ROC. The EAP review will seek to ensure that the policy remains fit for purpose in an evolving global context. It will include PRGT and blend EA arrangements that were not covered in the IEO evaluation, taking into consideration the findings of the 2024 PRGT Review. Among other tasks, it will also consider the balance between rules and flexibility within the policy, and whether the reintroduction of the use of exceptional circumstances (EC) clause could be warranted, as well as the associated risks. Subsequent reviews will take place after intervals of at least 7 years, with flexibility to conduct reviews earlier or later if circumstances warrant. (Timeline: CY 2027)	**SPR-FIN-LEG** (in collaboration with other departments)

IEO Recommendation	Executive Directors' Responses	Follow-Up Plan	Accountability
	clause for rare and well-justified cases when strategic or political considerations may call for decisions on EA program that fail to meet the EAC. At the same time, many Directors expressed reservations about this proposal. They stressed the need to take into account risks that the EC could stigmatize programs where applied and raised concerns about evenhandedness and transparency in the Fund's lending policies.		
Recommendation 2. Program Design: The Fund should clarify the fundamental role of sound program design in providing higher safeguards in EA cases relative to NA. Program staff reports should provide justification for the policy choices and trade-offs embedded in program design and how they support reasonably strong prospects for program success, including the authorities' political and institutional capacity to implement the program. Related risks should be clearly disclosed to the Board.	Directors broadly agreed with Recommendation 2 to clarify the fundamental role of sound program design in providing higher safeguards in EA cases relative to NA programs. Directors strongly agreed on the importance of sound program design and strengthening justification for policy choices and trade-offs. In that regard, they saw merit in the evaluation's recommendation to strengthen the justification of program design and its consistency with reasonably strong prospects of program success (EAC4) and adequate safeguards in EA cases. They emphasized that all EA and NA programs should remain subject to a single, common Upper Credit Tranche quality standard. Directors also generally agreed that additional rigor in assessments should not come at the expense of practical	**Role of program design.** The ROC will provide an in-depth assessment of IMF-supported program design and recommendations for enhancing effectiveness, including of exceptional access programs. Following the completion of the ROC, the operational guidance note (OGN) on program design and conditionality will be revised, with general guidance that applies also to EA cases. (Timeline: CY 2026) **EAC4.** Further reflections on the consistency of the program design with EAC4 will be made in the context of the EAP Review. **Staff guidance on EA notes** will, in the meantime, formalize the expectation that EA notes be circulated no less than two days in advance to the Board, and encourage teams to provide a	**SPR (in collaboration with LEG)**

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	applicability across heterogeneous situations, given differing forms of institutional and political capacity and commitment. Directors agreed to build on ongoing staff efforts to provide clearer guidance for assessing political assurances in the run up to elections for Fund-supported programs in order to enhance the assessment of institutional capacity, including leveraging advice in the Operational Guidance Note on Program Design and Conditionality. Directors agreed on the importance of disclosing risks to the Board and of guidance on public communications in EA cases.	candid assessment of the rationale for seeking exceptional access, including on the role of key elements of the program such as phasing and pace of adjustment in ensuring reasonably strong prospects of program success and adequate safeguards. (Timeline: 2026:Q1) **Management guidance on political assurances.** Staff will develop clearer guidance for assessing authorities' political assurances in the run-up to elections to deliver on UFR programs and program ownership which will be circulated to staff via a memo from Management. (Timeline: 2026:Q1) **Communications strategies for EA cases.** Recognizing the criticality of communications for EA programs, [beginning in July 2025], there will be an expectation that Area departments and COM staff will jointly prepare a communications plan for each new EA case. (Timeline: 2026:Q1)	 **SPR and LEG** **COM**
Recommendation 3. Exceptional Access Criteria 1–3: To address technical gaps in the EACs, facilitate better alignment with the policy's objectives, and enhance evenhandedness the Fund should (i) increase the level of	Directors generally agreed with Recommendation 3 to address technical gaps in the EAC to facilitate better alignment with the EAP's objectives and further ensure evenhandedness. They agreed that a review of the EAP should assess options to increase the effectiveness of the EAC. Directors broadly supported the	**EAC1-3.** The EAP review will evaluate the rationale and effectiveness of the EAC to ensure they align with the EAP's objectives and maintain evenhandedness. The review will analyze the strengths and limitations of the current EAC and consider ways to enhance their effectiveness without imposing	**SPR-FIN-LEG-MCM**

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scrutiny for access decisions; (ii) clarify expectations when debt is in the "gray zone," revisit its terminology to strengthen signaling, and clarify the distinct roles of the different types of debt and creditors for debt sustainability; and (iii) develop consistent analytical guidance to assess market access prospects.	IEO's recommendation to increase the level of scrutiny of access decisions (EAC1) for cases with debt in the gray zone—when debt is sustainable but not with high probability. Most Directors also agreed on the need to clarify expectations when debt is in the gray zone, revisit its terminology to strengthen signaling, and clarify the distinct roles of different types of debt and creditors (EAC2). However, some Directors also called for thorough reflection to assess whether tightening EAC2 could raise the prospects of deeper debt restructurings, in turn diminishing prospects for fulfilling EAC3. Directors generally concurred that more consistent forward-looking guidance should be developed to support assessments of market access prospects (EAC3). At the same time, some Directors cautioned on the need to consider the usefulness and resource implications of developing additional analytical frameworks to achieve these aims, given the inherent limitations of any framework that seeks to reliably gauge market access prospects and the role of judgment in Fund lending decisions.	significant strains on resources, while examining the interactions between the criteria and the role of judgment in decision making. (Timeline: CY2027)	
Recommendation 4. Exceptional Access Policy Procedures and Ex Post Evaluations: The Fund	Directors supported Recommendation 4 to strengthen the application of the EAP's enhanced procedures and adopt	**Staff guidance on early and regular informal consultation with Directors.** Staff guidance will be issued to clarify expectations	**SPR**

IEO Recommendation	Executive Directors' Responses	Follow-Up Plan	Accountability
should strengthen the application of the EAP's enhanced procedures and adopt measures to better leverage EPEs for risk mitigation, accountability, and learning.	measures to better leverage EPEs for risk mitigation, accountability, and learning. Enhanced procedures include early and regular informal consultation with Directors, while preserving management and staff's flexibility in program discussions and respecting authorities' prerogatives. Directors agreed to strengthen EPEs by implementing procedures that facilitate more systematic follow up while enhancing transparency of the process and ensuring adequate independence of EPE leaders and teams, including by having a roster of EPE leads and the formation of an interdepartmental review group.	regarding early and regular informal consultations with Directors in EA cases, while allowing Management and staff to retain flexibility in the format, timing, and content of informal Board consultations. This will subsequently be codified in the updated OGN. (Timeline: 2026:Q1) **Formation of interdepartmental rosters.** Management will direct departments to create interdepartmental rosters of EPE leads and senior reviewers. (Timeline: 2026:Q1) **Revision of the EPE GN.** The EPE GN will be revised to clarify the composition of these interdepartmental rosters, and the selection process for and responsibilities of EPE leads and senior reviewers, with the latter assuming joint sign-off responsibility with SPR and the area department in the departmental review process for EPEs. (Timeline: 2026:Q1) The revised EPE GN will also articulate procedures to ensure more systematic follow-up of EPEs, including by clarifying the expectations for stand-alone Board meetings for EPEs, for EA Notes associated with a successor EA program request to discuss how the prior EPE has informed	 **SPR-HRD-other departments** **SPR**

IEO Recommendation	Executive Directors' Responses	Follow-Up Plan	Accountability
		program design, and for the subsequent EPE to assess this.	
Recommendation 5. Enterprise Risk Management: The Fund should establish greater coherence between the EAP and the IMF's ERM policy. It should seek to ensure a common institutional understanding of how the EAP serves to mitigate enterprise risks consistently with the Fund's risk tolerance in lending.	Directors concurred with Recommendation 5 that the Fund should establish greater coherence between the EAP and the Fund's Enterprise Risk Management (ERM) framework, ensuring common institutional understanding of how the EAP mitigates enterprise risks consistently with the Fund's risk tolerance in lending. Directors recognized the importance of timely risk disclosures to the Board and continued progress to enhance risk analysis in program documents, including further leveraging recently introduced Enterprise Risk Assessments. Mindful that primary responsibility remains with area departments in close consultation with review departments, a number of Directors considered that the Office of Risk Management could gradually be given greater responsibility over financial risk supplements in EA program documents.	The **ERM operational guidance note** clarifies the requirements for inclusion of enterprise risk assessments in country operational papers, including in documents on EA financing. (Timeline: 2025:Q2) The **EAP review** will clarify the role, if any, of risks beyond financial ones in informing EA decisions. Potential modifications to the ERM policy, if warranted, could be considered in a future dedicated review of the ERM policy.	**ORM** **SPR-ORM-FIN-LEG**

Annex II. IEO Recommendations

1. ***EAP Review*. The Fund should conduct a dedicated review of the EAP and schedule subsequent reviews on a regular basis. EAP reviews should take due account of strategic considerations, including the adequacy of existing access limits and the balance between rules and flexibility within the policy.**

   - *Regular reviews.* Regular, thorough, and inclusive reviews should be the main vehicle for making changes to the EAP. These reviews could take stock of how the policy is serving the Fund's objectives in a changing global environment and assess performance with respect to the policy's objectives, relevance, and effectiveness.

   - *Adequacy of existing access limits.* EAP reviews should take due account of how effectively existing access limits serve members' BOP needs, the evolving circumstances and needs of the membership, and quota erosion.

   - *Transparent use of flexibility.* The subsequent EAP review could consider if the use of the exceptional circumstances (EC) clause warrants any change to the policy.

2. ***Program design*. The Fund should clarify the fundamental role of sound program design in providing higher safeguards in EA cases relative to normal access (NA). Program staff reports should provide justification for the policy choices and trade-offs embedded in program design and how they support reasonably strong prospects for program success, including the authorities' political and institutional capacity to implement the program. Related risks should be clearly disclosed to the Board.**

   - *Justification of program design.* Program staff reports should clearly articulate the reasons for key policies chosen, how tradeoffs were treated, including the risks of not having an EA program, and the consistency of program design with reasonably strong prospects for program success and adequate safeguards. A clear disclosure of risks to the Board will be important in internal discussions.

   - *Refocusing of EAC4.* An enhanced EAC4 focusing on the key elements that underlie a "reasonably strong" prospect of program success could be moved up in the list of criteria emphasizing the coherence of all program components and the interrelation of the different EACs.

   - *Guidance on political and institutional capacity.* Staff should develop clearer guidance for assessing authorities' political and institutional capacity to deliver on the program and program ownership.

   - *Program duration and phasing.* The duration, phasing and frontloading of programs needs to be calibrated to members' needs and the nature of the BOP problems.

- *Guidance on communications.* Integrating the elements above, and to protect the prospects of program success, the EAP could recognize the criticality of public communications in EA cases.

3. *EACs.* To address technical gaps in the EACs, facilitate better alignment with the policy's objectives, and enhance evenhandedness the Fund should (i) increase the level of scrutiny for access decisions; (ii) clarify expectations when debt is in the "gray zone," revisit its terminology to strengthen signaling, and clarify the distinct roles of the different types of debt and creditors for debt sustainability; and (iii) develop consistent analytical guidance to assess market access prospects.

- *EAC1.* Possible enhancements to staff reports include the following: greater scrutiny of access decisions for cases with debt in the gray zone to reflect how EA may affect the member's future BOP stability and its effects on catalytic financing and repurchase obligations; and a discussion of options for how the member could respond should financing needs turn out to be significantly greater or smaller than envisaged.

- *EAC2 and EAC3.* Measures to improve these criteria could include clarifying expectations that gray zone cases would return to sustainability with high probability by the end of the program in order to ensure adequate incentives for strong program design (and for restructuring where needed); revisiting the terminology and signaling of "debt sustainability with high probability"; and, for EAC3, developing more consistent forward-looking guidance to support assessments of market access prospects.

4. *EAP procedures and Ex-Post Evaluations (EPEs).* The Fund should strengthen the application of the EAP's enhanced procedures and adopt measures to better leverage EPEs for risk mitigation, accountability, and learning.

- *Enhanced decision-making procedures.* Seeking to enhance the information provided to the Board while preserving management's room for maneuver and staff's flexibility in negotiations, and respecting authorities' prerogatives.

- *Ex post evaluations.* EPEs would benefit from more systematic follow-up by staff, fuller focus on their mandates, and greater attention by the Board to enhance their designated role and justify the resources devoted to them. Management and staff should ensure that EPE leaders and teams have adequate independence.

5. *Enterprise Risk Management (ERM).* The Fund should establish greater coherence between the EAP and the IMF's ERM policy. It should seek to ensure a common institutional understanding of how the EAP serves to mitigate enterprise risks consistently with the Fund's risk tolerance in lending.

- *Consistency.* EAP provisions should be consistent with the Fund's ERM and, conversely, the ERM policy should take account of the risks associated with EA and their mitigation by the EAP.

- *Risk analysis in program documents.* EA program proposals should build on recent progress to enhance the presentation of enterprise risks in EA program cases.

- *Office of Risk Management (ORM).* From a risk management perspective, as ORM develops its capacity over time, it could be given greater responsibility for the supplements as the second line of defense.