ASSESSING THE EXPECTED IMPACT OF ALBANIA'S PROPOSED PUBLIC SECTOR ACCOUNTING LAW: A TRIANGULATED FRAMEWORK AND GOVERNMENT EVALUATION TOOL

LINDITA GJIKA ÇEPANI

Faculty of Economics, University of Tirana, Tirana, Albania
E-mail: linditagjika@feut.edu.al

Abstract - Albania is developing a new legal framework for public-sector accounting as part of a wider public financial management reform designed to strengthen financial reporting, transparency, accountability, and progressive conformity with International Public Sector Accounting Standards (IPSAS). This paper has two related objectives: to assess the expected impacts of the proposed Public Sector Accounting Law and to develop an effective framework that the Government of Albania, particularly the Ministry of Finance, could use to monitor and evaluate those impacts during implementation. The study applies document analysis and comparative evidence analysis across the 2026 Regulatory Impact Assessment, explanatory report, and draft law. It also explores Albania's Public Financial Management Strategy 2023-2030; PEFA diagnostic evidence; World Bank/PULSAR materials; and the IPSASB Conceptual Framework. The evidence is studied in reference to legal coherence, reporting quality, transparency and accountability, standardisation and IPSAS alignment, accrual accounting and consolidation, internal control, decision usefulness and implementation capacity. The results show a positive expected direction, particularly for legal coherence, comparability, transparency, consolidation, and clearer institutional responsibilities, while highlighting dependencies related to secondary legislation, professional capacity, information systems, and data quality. Based on these conclusions, the paper proposes an assessment framework that combines a structured survey of accounting and finance staff with administrative indicators, reporting outcomes and audit evidence. The framework is designed for baseline, transition, and follow-up assessment and supports evidence-based adjustments to training, guidance, systems, and implementation sequencing.

Keywords - Financial Reporting, Government Evaluation, Impact Assessment, Institutional Capacity, Legal Reform, Public Sector Accounting, Source Triangulation

I. BACKGROUND, MOTIVATION AND OBJECTIVE

Albania's public-sector accounting reform has reached a major institutional stage with the preparation of a dedicated law on public-sector accounting. The 2026 Regulatory Impact Assessment (RIA) presents the reform as a response to a segmented regulatory environment in which accounting requirements have largely been governed through secondary legislation and technical instructions rather than through a single, stable legal framework [1]. The RIA identifies consequences including differences in interpretation, unclear responsibilities, weaknesses in consolidation, insufficient transparency plus limited use of accounting information in financial management and decision making. The draft law aims to establish a unified reliable and transparent accounting system for public-sector entities and to regulate the preparation, presentation, publication and consolidation of financial statements. It introduces or reinforces accrual-oriented accounting concepts, double-entry recording, clearer recognition and measurement principles, financial-statement publication, consolidation based on control, and defined responsibilities for reporting entities, authorising officers and implementing officers [2], [3]. These provisions place accounting reform within a wider system of public financial management rather than treating it as an isolated technical process.

The reform is also embedded in Albania's Public Financial Management Strategy 2023-2030. Pillar 4 sets a 2030 goal of preparing and publishing consolidated financial statements in compliance with IPSAS following rollout across central government. Measures include expanding AGFIS access, developing the legal and regulatory framework, improving system functionality, institutionalising capacity development for accountants, and finalising asset-registration reforms [4]. The strategy therefore links the legal framework, information systems and human capacity as mutually dependent reform components. This paper has two linked objectives. First, it assesses the expected impacts of the proposed Public Sector Accounting Law by triangulating legal, strategic, diagnostic, and international sources. Second, it translates the resulting impact domains into a practical government evaluation framework that the Ministry of Finance could use at baseline, during the transition and after implementation to estimate whether the expected benefits are being realised and to identify where additional implementation support is required.

II. REFORM CONTEXT AND ANALYTICAL FRAMEWORK

A. Problems addressed by the reform

The policy documents identify a key problem: the absence of a dedicated public-sector accounting law

creates a weak legal hierarchy and disperses key requirements across multiple instructions and administrative practices [1], [3]. This disaggregation matters because accounting rules determine not only recording methods but also responsibilities, reporting boundaries, consolidation, publication and the evidence base used by managers, auditors and oversight institutions.

Independent diagnostic evidence confirms that several of the targeted weaknesses are significant. The Albania 2024 PEFA assessment reports incompleteness regarding financial reporting and monitoring, including the absence of consolidated annual financial statements for central government and limited consolidated in-year reporting. PEFA also identifies limited coverage of information systems and notes that national accounting standards are still being aligned with IPSAS [5]. The results are important for comparative evidence analysis because they provide evidence independent of the documents advocating the reform.

The international benchmark also supports the reform's direction. The IPSASB Conceptual Framework identifies accountability and decision taking as central objectives of public-sector general-purpose financial reporting. It emphasises qualitative characteristics such as relevance, faithful representation, understandability, timeliness, comparability and verifiability [9]. Comparative research likewise shows that IPSAS have become an important international reference point for public-sector accounting reform, although the depth and pace of adoption vary across jurisdictions [13], [14]. The draft Albanian law incorporates essentially the same information-quality logic, suggesting alignment not only in individual accounting rules but also in reporting objectives.

B. Professional capacity and institutional learning

A key hypothesis of this paper is that legal reform can only generate accounting improvements through organisational and professional implementation. The RIA acknowledges unequal capacity across institutions, training and methodological needs, the need to adapt financial information systems, the risk of compliance in form only, and possible delays in secondary legislation [1]. Evidence from other public-sector accrual reforms similarly shows that staff training and technical competence are important implementation conditions [17]. The World Bank's Albania public-sector accounting education pathway identifies the need for updated curricula, professional competence development, human resources for IPSAS training, information technology, and stronger stakeholder cooperation [7].

This makes professional education an implementation mechanism rather than a secondary benefit. Public-sector accountants must understand new recognition and measurement requirements, documentation and audit-trail expectations, reporting boundaries, consolidation procedures and institutional responsibilities. In turn, managers and authorising officers need to understand how to use better accounting information for accountability plus decision-making. PULSAR's regional work emphasises that public-sector accounting reform requires both technical reporting development and sustained education and professional capacity building [8], [10].

III. METHODOLOGY: STRUCTURED DOCUMENT ANALYSIS AND SOURCE TRIANGULATION

A. Research design

The study employs structured qualitative document analysis. Document analysis is an established qualitative method in which documentary evidence is systematically selected, appraised, coded and synthesised; it also seeks concordance across sources produced for different purposes [11]. This approach is appropriate for ex-ante assessment of a legal reform because it enables the proposed mechanisms and expected effects of the law to be examined against current diagnostic evidence, strategic implementation plans and international reporting principles.

Triangulation was designed to test the expected impact of the proposed law from multiple source perspectives. The analysis uses four evidence groups: (1) policy-intention and legal-design documents; (2) national strategic implementation documents; (3) external diagnostic and reform-support sources; and (4) an international benchmark. Expected impacts were treated as more strongly supported where the same causal direction was visible across multiple evidence groups. Statements concerning the content, objectives, intended impacts and implementation requirements of the proposed reform are attributed to their originating documents; the paper's contribution is the cross-source synthesis, comparative assessment and development of the government evaluation framework.

Evidence group	Principal sources	Role in analysis
Policy/legal design	RIA, explanatory report, draft law [1]-[3]	Identifies problems, legal mechanisms, intended benefits and risks
National strategy	PFM Strategy 2023-2030 [4]	Tests consistency with wider PFM objectives, AGFIS, assets and capacity plans
Independent diagnostic	PEFA Albania 2024 [5]	Provides external evidence on current reporting, consolidation and IT weaknesses
Reform implementation	World Bank/PULSAR Albania and regional material [6]-[8], [10]	Provides implementation lessons, education needs and transition context
Normative benchmark	IPSASB Conceptual Framework [9]	Benchmarks reporting objectives and qualitative characteristics
Methodological basis	Bowen (2009) [11]	Supports systematic document analysis

TABLE I. EVIDENCE GROUPS USED FOR SOURCE TRIANGULATION
Source: Evidence groups classified for this study; the underlying policy, legal, diagnostic and benchmark material is cited in [1]-[11].

B. Coding and impact mapping

The documents were reviewed against a coding framework derived initially from the RIA's impact categories and then improved through comparison with the draft law, PEFA findings, the PFM Strategy and international sources. The factors that were anlysed were: legal and regulatory coherence, quality and dependability of financial reporting, transparency and accountability, standardisation and IPSAS alignment, accrual accounting and consolidation, internal control and institutional responsibilities, usefulness for management and decision taking, and implementation capacity.

For each domain, the analysis distinguished three elements: the existing problem, the reform mechanism, and the expected outcome. Implementation dependencies were coded separately. This distinction matters because an expected positive impact can be conceptually well supported while still depending on capacity. For example, consolidation may clearly improve the completeness of the public-sector financial picture. Still, the benefit depends on reporting boundaries, standardised data, system functionality and the ability of controlled entities to submit reliable information on time.

C. From impact assessment to a government evaluation framework

Following the analysis, the identified impact domains were translated into a proposed government monitoring and assessment framework. One component is a structured five-point Likert questionnaire for accounting and finance staff, with statements linked directly to legal coherence, reporting quality, transparency, standardisation, accrual accounting, consolidation, internal control, decision usefulness and implementation capacity. Professional-profile questions allow results to be compared across central government, local government and other reporting entities.

The proposed framework merges the survey component with administrative, reporting and audit indicators and is organised around three stages: baseline/readiness, transition monitoring and follow-up assessment. Repeated measurement would allow the Ministry of Finance to examine whether legal transparency, reporting quality, transparency and decision usefulness improve over time, while also tracking implementation conditions such as training, workload, information-system readiness, reporting timeliness, consolidation coverage, audit findings and requests for interpretation.

IV. TRIANGULATED EXPECTED IMPACTS

A. Legal coherence and regulatory stability

The strongest expected impact is related to legal coherence. The RIA and the explanatory report both describe the current framework as fragmented and dependent on multiple secondary instruments [1], [3]. The draft law responds by placing core principles, responsibilities and reporting obligations in the law itself [2]. The PFM Strategy separately identifies development of the legal and regulatory framework for accounting reform as a formal measure [4]. These sources agree that the reform will improve regulatory clarity and reduce uncertainty, even though secondary legislation will remain necessary for detailed application.

B. Reporting quality, comparability and verifiability

A second strong expected impact is improved quality and comparability of financial information. The draft law embeds qualitative characteristics aligned with IPSASB concepts and requires complete, accurate and updated accounting records [2], [9]. The RIA explicitly anticipates higher quality, comparability

and consistency of financial statements [1]. PEFA's finding that annual reporting remains incomplete strengthens the relevance of this reform objective [5]. Comparative European research also links accrual reform to demands for more transparent and accountable reporting while showing that implementation differs considerably across jurisdictions [15]. The expected direction is therefore positive, although actual improvement will depend on the quality of opening balances, asset registers, accounting policies and source data.

C. Transparency and accountability

The proposed publication of approved annual financial statements, together with relevant audit reports, creates a direct transparency mechanism [2], [3]. Clearer responsibilities for authorising and implementing officers also strengthen personal and institutional accountability. These mechanisms are consistent with IPSASB's emphasis on accountability to service recipients and resource providers [9] and with the broader PFM Strategy objective of more transparent and accountable public finance [4]. The expected impact is beneficial and relatively direct because publication and responsibility requirements can be observed and monitored after enactment.

D. Accrual accounting, assets and consolidation

The transition toward accrual-based accounting is expected to expand the financial picture beyond cash movements by recognising transactions and events when they occur and by improving the identification and measurement of assets and liabilities [2]. This broader information base is consistent with the accountability and financial-management purposes discussed in the public-sector accounting literature [19]. It can provide more complete information on financial position and obligations. However, the impact is more implementation-sensitive than legal coherence. Reliable accrual reporting requires inventory, valuation, opening balances, consistent policies, appropriately configured systems and trained personnel.

Consolidation is particularly important because PEFA identifies the absence of consolidated annual central-government financial statements as a major weakness [5]. The draft law defines control, reporting groups, consolidation responsibilities and deadlines [2]. Recent PULSAR work has also focused on consolidation and whole-of-government reporting as a continuing reform challenge in the region [12]. Evidence from Portugal and Spain likewise illustrates both the benefits and the practical difficulties of IPSAS-based consolidated financial statements [16]. The likely benefit is a more complete and comparable view of public finances, but the transition risk is significant because consolidation depends on uniform reporting across entities with different capacities.

E. Internal control and institutional responsibilities

The proposed law links accounting with internal control through documentation requirements, segregation of duties and clearer allocation of responsibility. Reporting entities are responsible for keeping accounts, preparing accurate and timely statements, cooperating with consolidation and preserving documentation; implementing officers have explicit responsibilities for accounting, documentation, audit trail and internal-control procedures [2]. The RIA expects these measures to improve financial control and reduce errors and inappropriate treatments [1]. Because these requirements formalise responsibility within existing PFM structures, the expected impact is favourable but dependent on effective enforcement and organisational practice.

F. Decision-making

Better accounting information is expected to support budgeting, financial management and strategic management. The IPSASB framework clearly connects general-purpose financial reporting to accountability and decision making [9]. At the same time, the RIA identifies limited integration of accounting information with budgeting and managerial processes as an existing weakness [1]. Research on IPSAS implementation in the Iberian Peninsula also shows that the use and usefulness of accounting information depend partly on how users perceive and apply the reform [18]. The causal link is reasonable but less automatic than publication or legal clarification: better information simply improves decisions if managers and institutions actively use it. Consequently, decision usefulness is assessed as a positive impact that depends on actual use.

G. Professional capacity and implementation readiness

The RIA expects clearer rules to reduce professional uncertainty and strengthen the status of finance and accounting structures. Still, it also identifies training, methodological updating and system adaptation as implementation obstacles [1]. Albania's PULSAR education pathway points to professional competence, training resources, information technology and curriculum development as continuing needs [7].

This is the principal conditional factor in the impact assessment. If capacity development is delayed, the law could improve formal compliance without generating equivalent gains in data quality or managerial use. Conversely, if training, technical assistance, systems and secondary legislation are sequenced with the legal transition, the reform is capable of creating a sustainable professional infrastructure for public-sector accounting. The human-capital component therefore should be

monitored as closely as technical compliance.

Domain	Problem	Reform mechanism	Expected impact	Assessment
Legal/regulatory coherence	Fragmented rules and interpretation	Dedicated statutory framework; unified principles	clearer rules, lower interpretive uncertainty	High
Reporting quality	Incomplete/uneven reporting	quality characteristics; standardised rules	greater accuracy, comparability, verifiability	High, capacity-dependent
Transparency/accountability	Uneven publication and responsibility	publication, audit links, defined responsibilities	greater public access and accountability	High
IPSAS alignment	Partial approximation	progressive IPSAS-based framework	greater standardisation and international comparability	High, gradual
Accrual/assets	limited completeness of financial position	accrual recognition; asset/liability measurement	more complete financial position	Medium-high; data intensive
Consolidation	no consolidated annual CG statements in PEFA	control-based consolidation and deadlines	more complete whole-of-government view	High need; implementation-sensitive
Internal control	risk of unclear or overlapping roles	segregation, documentation, audit trail	stronger control and traceability	High
Decision usefulness	accounting not fully used managerially	higher-quality information and reporting	better budgeting and management information	Medium-high; use-dependent
Professional capacity	uneven skills and systems	training, guidance, IT adaptation	stronger professional capacity and sustainable implementation	Critical enabling condition

TABLE II. TRIANGULATED EX-ANTE IMPACT MATRIX
Source: Triangulated synthesis of evidence from [1]-[10]. The final assessment column represents this study's cross-source evaluation of each impact's expected direction and implementation dependence.

V. PROPOSED GOVERNMENT IMPACT-ASSESSMENT FRAMEWORK

A. Purpose and components

The proposed framework aims to convert the expected impacts identified into measurable variables that can be followed throughout implementation. It combines four complementary actions: (1) a structured survey of accounting and finance staff; (2) administrative and compliance indicators; (3) financial-reporting outputs; and (4) audit and quality-review evidence. The purpose is to provide the Ministry of Finance with a practical tool to estimate the expected benefits of the law. The central impact proposition to be assessed is that the legal initiative on public-sector accounting improves the legal structure and the quality of public-sector financial reporting. A second evaluation question concerns implementation conditions: whether professional training, methodological support, information systems, data quality and institutional capacity influence the extent to which the expected impacts are achieved. This distinction permits the government to separate weaknesses in policy design from implementation challenges.

B. Administration of the survey component and integrated analysis

The Ministry of Finance could administer the survey component electronically to accounting and finance

staff across central government, local government, special funds and other reporting entities. Conducting the survey before the main implementation stages would provide a baseline for comparing results later.

Survey analysis should report item frequencies, means, and internal consistency (for example, Cronbach's alpha where appropriate) [20] and should be interpreted alongside the other evidence streams in the framework. Repeated rounds could compare changes over time and across institution types. If a stable panel is feasible, longitudinal analysis would track how the same respondents' assessments change; otherwise, repeated cross-sectional rounds can still show whether system-wide perceptions move in the expected direction.

Survey findings should be triangulated with administrative indicators identified or planned in the RIA, including timely adoption of secondary acts, the share of public entities applying the new framework, staff trained, compliance with reporting deadlines, quality-control findings, consolidation progress and requests for interpretation [1]. They should also be compared with reporting outputs and audit evidence. Combining these sources provides a stronger basis for estimating impact than relying on a single indicator or evidence type.

Survey domain	Illustrative content	Use by Ministry of Finance
Professional profile	institution, role, experience, IPSAS training, system use	segment results and identify capacity gaps
Legal coherence	clarity, fragmentation, interpretation, stability	test whether legal uncertainty declines
Reporting quality	accuracy, completeness, timeliness, verifiability, comparability	track perceived improvements in reporting
Transparency/accountability	publication, audit, responsibility, oversight	assess whether accountability mechanisms are visible
Standardisation/IPSAS	uniform practice, chart of accounts, IPSAS alignment	monitor standardisation and reform understanding
Accrual/consolidation	financial position, assets/liabilities, consolidation, deadlines	identify technical transition challenges
Internal control	segregation, errors, role clarity, documentation	assess control and traceability effects
Decision usefulness	budgeting, managerial use, performance assessment	test whether information is used beyond compliance
Implementation conditions	capacity, training, IT, workload, transition, guidance	target support to weaker institutions
Overall impact	legal framework, benefit-cost perception, credibility	provide summary perception indicator

TABLE III. SURVEY COMPONENT OF THE PROPOSED GOVERNMENT IMPACT-ASSESSMENT FRAMEWORK
Source: Proposed survey component developed in this study from the triangulated impact domains.

C. Evaluation cycle and indicators

A practical evaluation design should distinguish readiness, implementation and outcome stages. At the readiness stage, the government should establish the baseline level of familiarity with the law, prior IPSAS training, availability of accounting staff, quality of asset and liability records, current system coverage and perceived clarity of responsibilities. These measures would show where the starting conditions differ across institutions before the new requirements are fully operational.

During implementation, the attention should shift to process indicators. These include completion of training, access to methodological guidance, functionality of accounting systems, timeliness of secondary legislation, completion of opening-balance work, compliance with reporting deadlines and the frequency of requests for clarification. Survey questions on workload, technical support and confidence in applying the rules can identify problems earlier than year-end financial statements or audit reports. This is particularly useful during a phased transition because implementation difficulties may be concentrated in particular types of entities rather than across the whole public sector.

At the outcome stage, the government should examine whether the expected benefits identified by the triangulated assessment are visible in practice. Perception measures can assess whether staff experience greater legal clarity, standardisation,

comparability, transparency and decision usefulness. These should be compared with objective evidence such as the share of reporting entities submitting complete statements on time, consolidation coverage, recurring accounting errors, audit qualifications or findings, corrections required by the Ministry of Finance, and publication of financial statements within required deadlines.

The framework should include a clear way to use the results for improvement. If the survey, administrative data, financial reports and audit findings all show the same problem, there is stronger evidence that a policy change may be needed. For example, many requests for clarification together with low survey scores on legal clarity may suggest that more guidance or changes to secondary regulations are necessary. On the other hand, a higher workload in the first year of implementation does not necessarily mean that the reform is failing if reporting completeness and data quality are also improving. The results should therefore be interpreted together and in light of the stage of the reform, rather than relying on only one indicator.

Stage	Timing	Illustrative indicators	Decision use
Baseline / readiness	before major implementation	skills, training history, system coverage, asset data, role clarity	identify capacity gaps and target support
Transition monitoring	during phased implementation	training completion, workload, guidance, IT adaptation, deadlines, interpretation requests	detect operational bottlenecks early
Reporting outcomes	after annual reporting cycles	completeness, timeliness, consolidation, publication, quality-control and audit findings	test whether expected reporting benefits are being realised
Learning / adjustment	after each monitoring round	triangulate survey, administrative and audit evidence	revise guidance, training, sequencing or system support

TABLE IV. SUGGESTED EVALUATION CYCLE FOR THE MINISTRY OF FINANCE
Source: Proposed evaluation cycle developed in this study; illustrative indicators are informed by the reform and monitoring evidence in [1], [4]-[8].

VI. DISCUSSION

A. Why the expected impact is positive but conditional

Across the source groups, the expected direction of impact is mainly positive [1], [4], [5], [9]. The proposed law addresses weaknesses identified in both national policy documents and independent factors, and its design is broadly consistent with international public-sector reporting objectives. This direction is also consistent with comparative literature on IPSAS and European public-sector accounting reform [13], [14]. The strongest effects should be seen where the legal mechanism is clear: clearer hierarchy of rules, defined responsibilities, standardised reporting obligations and publication requirements. These changes can improve coherence and accountability relatively quickly once the law and implementing acts are operational.

The more technically ambitious effects—accrual reporting, reliable measurement of assets and liabilities, consolidation and better decision use—will take longer. They require data, systems and professional judgement rather than legal wording alone, a point also reflected in research on implementation capacity [17]. The phased transition planned in the draft law [2] is therefore consistent with the evidence emerging from the comparative evidence analysis: implementation needs to be sequenced and supported, not treated as a single compliance date.

B. Education and capacity as reform infrastructure

The review also shows why public-sector accounting education should be treated as part of institutional infrastructure. A move toward accrual and IPSAS-oriented reporting changes what accountants need to know, how they exercise judgement and how their work interacts with budgeting, internal control and audit. Training should therefore move beyond one-off awareness sessions toward structured professional development linked to role-specific competencies.

Albania already has a basis for this approach through PULSAR participation, IPSAS training initiatives and the planned integration of public-sector accounting education [7], [8]. The challenge is embedding this approach in institutions: capacity development must reach local and central entities, be refreshed as secondary regulations develop, and be connected to practical system use. Universities and professional bodies can complement government training by strengthening the pipeline of accountants familiar with public-sector accounting concepts before they enter public employment.

C. Contribution to impact assessment

The paper also makes a practical contribution by identifying expected benefits at the policy-design stage. The proposed framework recognises that no single evidence stream is sufficient.Staff may

perceive reporting quality as improving even when audit findings remain unchanged, while workload may temporarily rise during a necessary transition. For that reason, the survey is one component of a wider government evaluation tool that combines perceptions, administrative indicators, audit evidence and reporting outputs.

VII. CONCLUSIONS

This paper assessed the expected impacts of Albania's proposed Public Sector Accounting Law by document analysis and source triangulation. The evidence base brought together the RIA, explanatory report and draft law with the national PFM Strategy, PEFA diagnostic evidence, World Bank/PULSAR reform and education material, and the IPSASB conceptual framework. The analysis was then translated into a practical government framework to monitor and evaluate the reform during implementation.

The triangulated evidence supports the proposition that the legal initiative is likely to impact Albania's public-sector financial reporting framework positively. The most strongly supported expected benefits are improved legal coherence, reporting comparability and verifiability, transparency and accountability, clearer institutional responsibilities, stronger consolidation and closer consistency with international public-sector accounting principles. The assessment also identifies a critical qualification: benefits relating to accrual accounting, consolidation, asset and liability information and decision usefulness depend heavily on professional capacity, information systems, secondary legislation, data quality and the sequencing of implementation.

The proposed government impact-assessment framework provides a way to test these expectations systematically. A repeated staff questionnaire can measure perceived changes in legal transparency, reporting quality, accountability, professional capacity and implementation conditions. At the same time, administrative indicators, financial-reporting outputs and audit findings provide complementary evidence. Used at baseline, during transition, and after key reporting cycles, the framework could help the Ministry of Finance estimate whether expected impacts are being realised, identify differences across institution types, and adjust training, guidance, systems, or implementation sequencing where necessary.

The principal limitation of the present study is its ex-ante character: the assessment concerns expected effects of a proposed legal reform. The framework is therefore forward-looking as well as analytical. Once implementation milestones are reached, the government can populate the framework with collected survey, administrative, reporting and audit evidence and compare actual outcomes with the expected impact pathways identified in this paper.

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