

Assessing Legal Compliance and Challenges in Project Procurement of NIA-UPRIIS Division II

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Abstract- *This study assesses how well NIA-UPRIIS Division II complies with Philippine public procurement requirements under Republic Act (RA) 9184 and related NIA Memorandum Circulars, and identifies the operational challenges that weaken compliance. Using a descriptive quantitative design, procurement actors (e.g., BAC members/secretariat, TWG, supply officers, and engineers) answered a structured questionnaire covering end-to-end procurement stages and governance determinants. Results indicate high compliance in knowledge of procurement laws and internal controls, with similarly strong performance in legal bidding procedures, contract management, and monitoring practices. However, transparency and continuous improvement were rated only “Compliant,” reflecting weaker consistency in disclosure of procurement results, perceived fairness, grievance handling, and staff engagement in process learning. Conflict-of-interest management also remained at a basic compliance level, suggesting gaps in disclosure rigor, recusal mechanisms, ethics guidance, investigations, and enforcement. On the challenge side, respondents reported persistent documentation issues, heavy workload and turnover pressures, and constraints in support services and internal systems, while training and process timeliness emerged as highly challenging areas that contribute to delays and error risks. The study recommends targeted capacity-building, standardized documentation and filing controls, stronger transparency and grievance workflows, reinforced conflict-of-interest safeguards, and system/tool upgrades to improve audit readiness, timeliness, and accountability.*

Index Terms- *Public procurement compliance, RA 9184, Transparency, Conflict-of-interest management, Internal controls*

I. INTRODUCTION

Public procurement in the Philippine public sector is a critical process for efficiently and transparently delivering essential infrastructure and services, underpinned by Republic Act No. 9184, the Government Procurement Reform Act and its implementing guidelines. The National Irrigation Administration (NIA) has adopted more rigorous internal protocols through its Memorandum Circulars, notably MC No. 2021-088 and MC No. 2020-158, to align division-level operations and ensure robust

mechanisms for compliance, audit integrity, and project accountability.

Within NIA-UPRIIS Division II, procurement directly impacts the realization of the agency’s mission to provide effective irrigation services for local farmers. Despite structured regulation, procurement personnel encounter a range of challenges, such as incomplete documentation, heavy workloads, and gaps in procurement law knowledge, which pose risks to legal compliance and service delivery. Audit findings, project delays, and inefficiencies often stem from these persistent issues.

This study aims to assess the knowledge, compliance practices, and recurring challenges of procurement personnel in NIA-UPRIIS Division II, using a structured questionnaire addressing such areas as advertisement, bidding, evaluation, contract award, and documentation stages. The questionnaire is designed to systematically evaluate compliance in terms of knowledge of laws, internal controls, transparency, supplier compliance, capability development, legal bidding procedures, contract management, conflict-of-interest resolution, monitoring, and continuous process improvement. Challenges are examined in documentation quality, personnel workload, training adequacy, system support, process timeliness, feedback mechanisms, support services, and conflict management.

Through descriptive analysis and comprehensive data gathering, the research explores: (1) how legal compliance can be described across key procurement determinants; (2) what challenges impede compliance; and (3) any significant relationships between compliance and procurement challenges. The findings aim to inform recommendations for internal control enhancements, promote a culture of accountability, and improve legal compliance practices within NIA-UPRIIS Division II.

Specifically, this study sought answers to the following:

1. How may the legal compliance in procurement be described in terms of:

- 1.1 Knowledge of Laws;
- 1.2 Internal Controls;
- 1.3 Transparency;
- 1.4 Supplier Compliance;
- 1.5 Procurement Capability Enhancement;
- 1.6 Legal Procedures in Bidding;
- 1.7 Contract Management;
- 1.8 Conflict of Interest Management;
- 1.9 Monitoring; and
- 1.10 Continuous Improvement?

2. How may the challenges in the legal compliance of project procurement be described in terms of:

- 2.1 Documentation Quality;
- 2.2 Personnel Workload;
- 2.3 Training;
- 2.4 Internal Systems;
- 2.5 Process Timeliness;
- 2.6 Feedback Mechanisms;
- 2.7 Support Services;
- 2.8 Conflict Management?

3. Is there a significant relationship between legal compliance and challenges in the project procurement?

4. What may be recommended based on the results of the study?

II. METHODOLOGY

Research Design

This study employs a descriptive quantitative research design targeting legal compliance and challenges in project procurement at NIA-UPRIIS Division II. The approach allows for detailed measurement and analysis of knowledge, attitudes, practices, and challenges reported by procurement personnel directly involved in each stage of the process.

Population and Sampling

The research targets all personnel actively engaged in procurement processes at NIA-UPRIIS Division II, such as members of the Bids and Awards Committee (BAC), BAC Secretariat, Procurement/Supply Officers, Technical Working Group (TWG), and Project Engineers. If the eligible population is 20 or fewer, total enumeration is adopted; otherwise, purposive sampling selects staff with relevant procurement experience in the past 12 months to ensure meaningful and recent data.

Research Instrument

A structured, self-administered questionnaire serves as the main data collection tool. It contains sections on respondent profile, knowledge of procurement laws and agency guidelines (R.A. 9184, related NIA Memorandum Circulars), legal compliance practices across procurement stages (advertisement, bidding, evaluation, contract award, documentation), challenges encountered, and open-ended suggestions. Key areas measured by the questionnaire include internal controls, transparency, supplier compliance, capability enhancement, bidding procedures, contract management, conflict of interest management, monitoring, and continuous improvement. Sections addressing compliance and challenges use a 4-point Likert scale, ranging from "Strongly Disagree" to "Strongly Agree" or "Not a Challenge" to "Highly Challenging," respectively.

The questionnaire's design is vetted by public procurement experts through review and is pilot-tested among 5–8 procurement staff outside the division for clarity and reliability. Validity is reinforced by expert review, and reliability is ensured with Cronbach's alpha analysis, seeking a coefficient of at least 0.70. Items failing reliability or clarity are revised or dropped.

Data Collection

Written consent from management and coordination with the BAC Secretariat are procured before distribution. Questionnaires are given in both printed and online formats, with information sheets ensuring voluntary, confidential, and anonymous responses. Feedback from the pilot is incorporated for instrument refinement. Respondents are allotted 10–15 minutes to complete the survey. Clear instructions and support are provided throughout.

Data Analysis

Data were analyzed using descriptive statistics. Categorical variables in respondent profiles are summarized by frequencies and percentages; Likert-scale compliance and challenge items are summarized by means and standard deviations. A Compliance Index is derived for overall compliance assessment—mean scores are interpreted as Very High, High, Moderate, Low, or Very Low Compliance. Where appropriate, cross-tabulations explore compliance and challenge relationships across profile variables. Additional tests, such as chi-square or t-tests, are applied when assumptions are met. Cronbach’s alpha reliability checks are conducted for multi-item scales.

III. RESULTS AND DISCUSSION

Table 1 presents the legal compliance in procurement in terms of knowledge of laws.

Table 1. Knowledge of Laws

Key Areas	Weighted Mean	Verbal Description
I. Knowledge of Laws		
1. I am knowledgeable about the provisions of Republic Act No. 9184 and its Revised IRR.	3.53	Highly Compliant
2. I am aware of key NIA Memorandum Circulars relevant to procurement, such as MC 2021-088 and MC 2020-158.	3.47	Highly Compliant
3. I frequently review updates on procurement laws and agency guidelines.	3.47	Highly Compliant
4. I understand the specific legal requirements for each stage of the procurement process.	3.53	Highly Compliant
5. I can explain the key legal standards to colleagues when needed.	3.43	Highly Compliant
Overall Weighted Mean	3.49	Highly Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The overall weighted mean for Knowledge of Laws is 3.49 (“Highly Compliant”), indicating that respondents generally demonstrate strong familiarity with core procurement legal requirements and can likely apply them appropriately across procurement activities. This level of legal knowledge is important because Philippine procurement policy is anchored on transparency, competitiveness, accountability, and public monitoring—principles explicitly emphasized in Republic Act (RA) 9184 and its implementing rules.

An overall weighted mean of 3.49 (“Highly Compliant”) suggests a consistently high level of legal awareness needed to support a procurement

system that expects competitive and transparent processes as the default mode, with exceptions only under specific conditions. Practically, this implies reduced risk of procedural errors (e.g., incorrect choice of procurement method, missed documentary requirements) that could undermine accountability and public trust in procurement outcomes.

The highest weighted mean is 3.53 (tie) for Item 1 (knowledge of RA 9184 and the Revised IRR) and Item 4 (understanding legal requirements per procurement stage), both described as “Highly Compliant.” The strong rating on these two items is significant because RA 9184 and the Updated 2016 Revised IRR provide the governing principles, default competitive-bidding policy, and the end-to-end structure of the procurement process that procuring entities are expected to follow. Implication: Sustaining this strength supports consistent compliance across planning, bidding, award, and contract implementation, aligning day-to-day practice with the law’s transparency and accountability expectations.

The lowest weighted mean is 3.43 for Item 5 (“I can explain the key legal standards to colleagues when needed”), though it still falls under “Highly Compliant.” This “lowest-high” pattern suggests that while respondents understand the legal standards personally, there may be slightly less confidence or consistency in translating those standards into peer coaching, shared decisions, or team-based interpretations during procurement work. Implication: Targeted internal knowledge-sharing mechanisms (e.g., short legal updates, peer briefings, mentoring) would strengthen compliance culture because RA 9184 explicitly emphasizes capacity development/professionalization for procurement actors, not only individual knowledge.

Table 2 shows the legal compliance in terms of internal controls.

Table 2 Internal Controls

2. Internal Controls	Weighted Mean	Verbal Description
1. There are established internal controls that ensure procurement activities follow documented procedures.	3.33	Highly Compliant
2. Approval workflows are clearly defined and consistently implemented in procurement transactions.	3.43	Highly Compliant
3. Every procurement process undergoes proper evaluation before approval.	3.53	Highly Compliant
4. The division uses checklists or control measures to monitor compliance at each process stage.	3.47	Highly Compliant
5. Non-compliance with internal procedures is promptly addressed and corrected.	3.53	Highly Compliant
Overall Weighted Mean	3.46	Highly Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The results indicate that internal controls for procurement are perceived as robust and consistently applied, with all items rated “Highly Compliant” and an overall weighted mean of 3.46. This suggests a strongly institutionalized control environment that supports compliance, risk mitigation, and accountability in procurement processes, consistent with principles emphasized in Philippine public sector internal control and governance frameworks.

The overall weighted mean of 3.46 (“Highly Compliant”) reflects a strong implementation of internal control mechanisms across the procurement cycle, from procedure adherence to corrective actions for non-compliance. This aligns with good practice in public financial management, where well-designed internal controls help prevent irregularities, ensure proper authorization, and support value-for-money outcomes in line with the objectives of procurement reforms such as RA 9184.

The highest weighted means (3.53) appear in Item 3 (“Every procurement process undergoes proper evaluation before approval”) and Item 5 (“Non-compliance with internal procedures is promptly addressed and corrected”), both “Highly Compliant.” These scores imply strong control at the “gatekeeping” points of the process—evaluation prior to approval and responsive corrective measures—indicating that management review, technical/eligibility checks, and post-detection remediation are functioning effectively to uphold

integrity and legality of awards. This is consistent with internal control principles that stress pre-approval review and timely corrective action as critical safeguards against fraud, waste, and abuse in public procurement.

The lowest mean, 3.33, is for Item 1 (“There are established internal controls that ensure procurement activities follow documented procedures”), though it remains within the “Highly Compliant” range. This slightly lower rating suggests that while controls exist and are generally followed, there may be areas for improvement in fully documenting, standardizing, or communicating these controls (e.g., SOPs, manuals, or process maps) to all personnel. Strengthening documentation and dissemination of these controls can help reduce control gaps, ensure consistency across units, and reinforce compliance culture, which is a core expectation in public sector internal control frameworks and audit standards.

The legal compliance in terms of transparency is presented in Table 3.

Table 3 Transparency

3. Transparency	Weighted Mean	Verbal Description
1. I am confident in the transparency of tender evaluation and contract award processes within my division.	3.37	Highly Compliant
2. Procurement decisions are made fairly and without personal or political bias.	3.13	Compliant
3. The results of procurement activities are disclosed to all interested stakeholders.	3.03	Compliant
4. Grievances or complaints about procurement practices are properly documented and resolved.	3.23	Compliant
5. There are clear policies to prevent and address conflicts of interest in procurement.	3.26	Highly Compliant
Overall Weighted Mean	3.21	Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The findings show that transparency in procurement is perceived as generally present but not yet consistently strong across all dimensions. The overall pattern suggests that while basic mechanisms for transparency exist, there are critical areas—especially fairness, disclosure, and grievance handling—that require strengthening to fully align with good governance and anti-corruption standards in public procurement.

The overall weighted mean of 3.21, interpreted as “Compliant,” indicates that transparency practices are functioning at an acceptable but not optimal level. This implies that minimum expectations are usually met, but systems for openness, disclosure, and accountability are not yet institutionalized to the same “Highly Compliant” degree seen in knowledge of laws or internal controls, which may leave more room for perceived discretion, information gaps, or stakeholder mistrust.

The highest item means are 3.37 for confidence in the transparency of tender evaluation and contract award processes (Item 1) and 3.26 for the existence of clear policies to prevent and address conflicts of interest (Item 5), both falling into “Highly Compliant.” This suggests that, internally, staff generally trust the evaluation and award processes and recognize that formal policies on conflicts of interest are in place—an important foundation because transparent evaluation and conflict-of-interest safeguards are core elements of integrity in public procurement systems. The implication is that the division has already established some key policy and process safeguards, and further improvement efforts can build on this perceived strength to enhance external visibility, stakeholder engagement, and documentation.

The lowest means are 3.03 for disclosure of procurement results to stakeholders (Item 3) and 3.13 for fairness and absence of personal or political bias in decisions (Item 2), both only “Compliant,” with the grievance mechanism (Item 4) at 3.23 also in the “Compliant” band. These scores imply that stakeholders may not consistently receive timely, accessible information on procurement outcomes, and there may be lingering perceptions that decisions could be influenced by non-technical considerations, with grievance handling seen as present but not fully robust. The implications are significant: enhancing regular publication of procurement results, strengthening documentation of evaluation and award justifications, and reinforcing impartiality and grievance-resolution mechanisms are necessary steps to move from basic compliance toward a culture of proactive transparency and public accountability.

The legal compliance in terms of supplier compliance is shown in Table 4.

Table 4 Supplier Compliance

	Weighted Mean	Verbal Description
4. Supplier Compliance		
1. All procurement policies and procedures are clearly documented and accessible to all relevant staff.	3.4	Highly Compliant
2. Procurement documents are checked for completeness and accuracy before project implementation.	3.27	Highly Compliant
3. Suppliers are regularly screened for legal, ethical, and financial compliance before contracts are awarded.	3.17	Compliant
4. Contracts are only awarded after full compliance with documentation and approval requirements.	3.33	Highly Compliant
5. All supporting documents are properly filed and available for audit or review.	3.4	Highly Compliant
Overall Weighted Mean	3.31	Highly Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The results indicate that supplier-related compliance mechanisms are generally strong, with an overall weighted mean of 3.31 interpreted as “Highly Compliant.” This suggests that, from the perspective of respondents, the division maintains a high level of adherence to documentation, approval, and audit readiness requirements in dealing with suppliers, which is consistent with the compliance and accountability thrust of Philippine public procurement reforms under RA 9184 and its Revised IRR.

An overall weighted mean of 3.31 (“Highly Compliant”) reflects that supplier compliance is not just minimally met but is, on average, implemented at a high standard across the measured indicators. This implies that processes such as documentation, filing, and pre-award checks are sufficiently institutionalized, supporting auditability and traceability of transactions, which are critical for demonstrating that public funds are used in accordance with procurement rules and principles of transparency, competitiveness, and accountability.

The highest means are 3.40 for Item 1 (“All procurement policies and procedures are clearly documented and accessible to all relevant staff”) and Item 5 (“All supporting documents are properly filed and available for audit or review”), both “Highly Compliant.” This pattern indicates that documentation and records management are key strengths: staff perceive policies as well-documented and accessible, and supporting documents as systematically filed and retrievable, which directly supports ex-post review by internal and external auditors and aligns with documentary control expectations for procuring entities. The implication is that the division’s documentation culture provides a

solid foundation for sustaining compliance, defending decisions during post-audit, and deterring irregular practices because records are organized and visible.

The lowest mean is 3.17 for Item 3 (“Suppliers are regularly screened for legal, ethical, and financial compliance before contracts are awarded”), which falls only under “Compliant,” and is notably lower than the rest of the items despite the overall “Highly Compliant” rating. This suggests that while some level of supplier screening exists, respondents may perceive it as less rigorous, less systematic, or less frequent compared with other control practices such as documentation and filing. The implication is that the division may need to further strengthen and standardize pre-qualification or due diligence processes (e.g., validation of licenses, tax clearance, blacklist checks, track record, and financial capacity), since RA 9184 and its implementing rules emphasize eligibility, legal, technical, and financial requirements as prerequisites to contract award to safeguard the government from engaging with ineligible or high-risk suppliers.

Table 5 shows the legal compliance in terms of procurement capability enhancement.

Table 5 Procurement Capability Enhancement

5. Procurement Capability Enhancement	Weighted Mean	Verbal Description
1. Our division regularly provides training or briefing sessions on procurement compliance.	3.3	Highly Compliant
2. Additional training is needed for staff to strengthen knowledge on procurement laws and compliance.	3.57	Highly Compliant
3. Administrative support for procurement compliance in our office is sufficient.	3.23	Compliant
4. Tools and systems used for procurement are regularly updated and improved as needed.	3.1	Compliant
5. Lack of personnel or excessive workload is addressed by management to maintain compliance.	3.03	Compliant
Overall Weighted Mean	3.25	Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The results show that procurement capability enhancement is functioning at a basic but not yet optimal level, with clear recognition from staff that further strengthening is needed. The pattern indicates that while some support mechanisms (e.g., training) exist, there are gaps in tools, systems, and staffing that constrain sustained high-level compliance.

The overall weighted mean of 3.25, interpreted as “Compliant,” suggests that the current capability enhancement efforts meet only the minimum acceptable level rather than reaching “Highly Compliant” practice. This implies that the division is able to maintain compliance but does so with constraints, indicating a need for more systematic investment in capacity-building, support structures, and resourcing if higher compliance and performance standards are to be achieved.

The highest mean is 3.57 for Item 2 (“Additional training is needed for staff to strengthen knowledge on procurement laws and compliance”), followed by 3.30 for Item 1 (“Our division regularly provides training or briefing sessions on procurement compliance”), both described as “Highly Compliant.” The first result reflects a strong perceived need for more or deeper training, while the second confirms that some training or briefing activities are already in place and reasonably frequent. The implication is twofold: staff are aware of the importance of procurement compliance and are receptive to further capacity-building, and management already has a training platform that can be intensified and better targeted (e.g., advanced topics, updates, specialized roles) to close remaining competency gaps.

The lowest means are 3.03 for Item 5 (“Lack of personnel or excessive workload is addressed by management to maintain compliance”) and 3.10 for Item 4 (“Tools and systems used for procurement are regularly updated and improved as needed”), both only “Compliant,” with Item 3 on administrative support (3.23) also just within “Compliant.” These scores suggest that structural and operational supports—adequate staffing, workload management, updated tools/systems, and strong administrative backing—are perceived as weaker compared with the training dimension. The implications are critical: even if staff are trained and willing, persistent constraints such as limited personnel, heavy workloads, and outdated tools may undermine consistent compliance, increase the risk of errors or delays, and limit the full realization of reforms. Addressing these areas would require management actions such as rationalizing workload, augmenting staff or assigning dedicated procurement personnel, investing in updated procurement systems, and strengthening day-to-day administrative support to create an enabling environment that matches the division’s training and compliance ambitions.

The legal compliance in terms of legal procedures in bidding is presented in Table 6.

Table 6 Legal Procedures in Bidding

6. Legal Procedures in Bidding	Weighted Mean	Verbal Description
1. All stages of project bidding are conducted in accordance with legal and regulatory requirements.	3.27	Highly Compliant
2. Bid evaluation criteria are transparent and compliant with government procurement rules.	3.33	Highly Compliant
3. Advertisement, submission, and opening of bids follow prescribed timelines and public notice requirements.	3.27	Highly Compliant
4. Clarifications during bidding are communicated openly and recorded as required.	3.23	Compliant
5. Bidder disqualifications, when applicable, are clearly justified and documented under the law.	3.5	Highly Compliant
Overall Weighted Mean	3.32	Highly Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The findings indicate that legal procedures in bidding are generally implemented at a high level, with only a few aspects still at a “Compliant” rather than “Highly Compliant” standard. This pattern suggests a strong legal compliance culture in bidding, with room to strengthen documentation and communication during clarifications.

The overall weighted mean of 3.32, interpreted as “Highly Compliant,” shows that, on average, the division’s bidding practices adhere closely to legal and regulatory requirements across the procurement cycle. This implies that the core legal expectations for public bidding—compliance with rules, proper evaluation, documentation, and observance of timelines—are largely institutionalized in practice, which helps reduce the risk of bid challenges, audit findings, or allegations of irregularity.

The highest mean is 3.50 for Item 5 (“Bidder disqualifications, when applicable, are clearly justified and documented under the law”), rated “Highly Compliant.” This result indicates that when bidders are disqualified, the division is perceived as careful in grounding decisions on legal bases and documenting them properly, which is critical because disqualification is often contentious and must withstand scrutiny by auditors, management, and potentially aggrieved bidders. The implication is that decision-makers are deliberate and legally guided in excluding bidders, reinforcing fairness and defensibility of awards and helping to protect the agency from appeals, complaints, and reputational risk.

Items 2 (“Bid evaluation criteria are transparent and compliant with government procurement rules,” mean 3.33) and Items 1 and 3 (“All stages of project bidding are conducted in accordance with legal and

regulatory requirements” and “Advertisement, submission, and opening of bids follow prescribed timelines and public notice requirements,” both 3.27) are also rated “Highly Compliant.” These results suggest that the division not only uses criteria consistent with government procurement rules but also generally complies with procedural requirements on stages and timelines, such as public advertisement and proper conduct of bid opening. The implication is that the division’s bidding framework is structurally sound: the “rules of the game” are properly defined, legally anchored, and mostly applied in practice, which supports competitive, transparent, and time-bound procurement.

The lowest mean is 3.23 for Item 4 (“Clarifications during bidding are communicated openly and recorded as required”), which is only “Compliant.” This score indicates that while clarifications do occur and are documented to some extent, staff perceive them as less consistently open or systematically recorded compared with other legal aspects of bidding. The implication is that the division needs to strengthen its processes for handling clarifications—such as ensuring that all bidders receive the same information, that minutes or supplemental bid bulletins are consistently prepared and disseminated, and that a complete audit trail exists. Improving this area would close a potential gap that could otherwise be seen as a source of unequal information, misunderstanding of requirements, or later disputes, and would bring the overall legal compliance in bidding closer to a uniformly “Highly Compliant” level.

Table 7 presents the legal compliance in terms of contract management.

Table 7 Contract Management

7. Contract Management	Weighted Mean	Verbal Description
1. Contracts specify obligations regarding compliance, and penalties for breach are enforced.	3.5	Highly Compliant
2. Final contract signing is only done upon completion of all legal and documentary requirements.	3.33	Highly Compliant
3. Contract implementation is regularly monitored for continued compliance with legal standards.	3.43	Highly Compliant
4. Non-compliances found during contract execution result in corrective actions or penalties.	3.37	Highly Compliant
5. There is an established procedure to handle contract disputes according to legal guidelines.	3.47	Highly Compliant
Overall Weighted Mean	3.42	Highly Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The findings indicate that contract management practices are perceived as consistently strong and legally compliant across all measured areas. This suggests a mature post-award control environment where legal requirements, monitoring, and remedies for non-compliance are well institutionalized.

The overall weighted mean of 3.42, interpreted as “Highly Compliant,” shows that the division’s contract management processes generally operate at a high standard relative to the legal and procedural expectations. This implies that compliance is not limited to pre-award and bidding stages but is sustained through contract execution, supporting accountability and value-for-money throughout the procurement cycle.

The highest mean is 3.50 for Item 1 (“Contracts specify obligations regarding compliance, and penalties for breach are enforced”), rated “Highly Compliant.” This indicates that contracts are not only well-drafted in terms of specifying obligations, but that penalty clauses are actually applied in practice when breaches occur. The implication is that suppliers are held accountable for performance, which helps deter contractual violations, encourages adherence to specifications and timelines, and protects the agency’s interests.

Items 5 (“There is an established procedure to handle contract disputes according to legal guidelines,” mean 3.47) and 3 (“Contract implementation is regularly monitored for continued compliance with legal standards,” mean 3.43) also score very high. These results suggest that structured monitoring mechanisms exist and that dispute-resolution pathways are clearly defined and aligned with legal norms, which is critical for managing performance issues, variations, and conflicts during implementation. Item 4 (“Non-compliances found during contract execution result in corrective actions or penalties,” mean 3.37) and Item 2 (“Final contract signing is only done upon completion of all legal and documentary requirements,” mean 3.33) likewise being “Highly Compliant” indicate that both entry into contract and its execution are tightly controlled. The implication is a coherent system: contracts are only formalized when all requirements are complete, then actively monitored, with non-compliances addressed through corrective actions, penalties, or formal dispute procedures, thereby minimizing legal and financial risks.

The lowest mean, though still “Highly Compliant,” is 3.33 for Item 2 (“Final contract signing is only done

upon completion of all legal and documentary requirements”). This slightly lower score compared with other items may suggest occasional perceptions of pressure to proceed despite documentation bottlenecks or timing constraints, even if such cases are not frequent. The implication is that management should continue reinforcing the principle of “no contract without complete requirements” and streamline pre-signing verification processes, so that practice always matches policy and there is no perceived slippage at this critical control point.

The legal compliance in terms of conflict management is shown in Table 8.

Table 8 Conflict of Interest Management

8. Conflict of Interest Management	Weighted Mean	Verbal Description
1. All procurement committee members are required to disclose potential conflicts of interest.	3.17	Compliant
2. There are mechanisms to prevent individuals with conflicts from participating in relevant procurement decisions.	3.1	Compliant
3. Reports or suspicions of favoritism, collusion, or conflicts are investigated following legal procedures.	3.1	Compliant
4. Employees receive guidance on ethical boundaries regarding gifts, favors, or relationships with bidders.	3.13	Compliant
5. Violations of conflict-of-interest policies are documented and result in disciplinary action.	3.1	Compliant
Overall Weighted Mean	3.12	Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The results show that conflict of interest management is functioning at only a basic “Compliant” level, with no dimension reaching “Highly Compliant.” This indicates that while minimum expectations are generally met, there are important weaknesses in prevention, disclosure, guidance, and enforcement that could expose the procurement process to integrity risks.

The overall weighted mean of 3.12, interpreted as “Compliant,” suggests that the systems and practices addressing conflicts of interest are present but not yet strong, consistent, or deeply embedded in the division’s culture. This level implies that mechanisms exist on paper or in practice, but their implementation may be uneven or perceived as reactive rather than systematic and proactive. Such a pattern is critical because conflict of interest management is central to safeguarding fairness, transparency, and trust in public procurement.

The highest mean is 3.17 for Item 1 (“All procurement committee members are required to disclose potential conflicts of interest”), still only “Compliant.” This shows that disclosure is recognized and practiced to some extent, but not with the robustness expected of a “Highly Compliant” environment (e.g., regular and updated declarations, clear forms, strict enforcement). The implication is that the division has a starting point—a disclosure requirement—but needs to institutionalize it more strongly through standardized, periodic declarations, clearer rules, and visible enforcement to prevent both real and perceived conflicts from influencing decisions.

Several items share relatively low means—3.10 for Items 2, 3, and 5, and 3.13 for Item 4—each only “Compliant,” and collectively forming a pattern of weak prevention, guidance, and enforcement:

Item 2 (3.10): “There are mechanisms to prevent individuals with conflicts from participating in relevant procurement decisions.” This suggests that recusal or reassignment mechanisms may exist but are not consistently or visibly applied. The implication is that decision-making panels and technical working groups may not always be fully insulated from conflicted members, which can undermine confidence in the impartiality of awards.

Item 3 (3.10): “Reports or suspicions of favoritism, collusion, or conflicts are investigated following legal procedures.” This indicates that investigations do occur but may not be systematic, timely, or perceived as rigorous. The implication is that potential integrity issues might not always be addressed in a way that deters future misconduct or reassures stakeholders that concerns are taken seriously.

Item 4 (3.13): “Employees receive guidance on ethical boundaries regarding gifts, favors, or relationships with bidders.” This reflects limited or irregular ethics education and concrete guidance on what is acceptable or prohibited. The implication is that gray areas in behavior (e.g., hospitality, tokens, social relationships) may not be clearly managed, increasing the risk of unintentional violations or ambiguous practices that erode perceived integrity.

Item 5 (3.10): “Violations of conflict-of-interest policies are documented and result in disciplinary action.” This suggests that while some violations may be recorded and sanctioned, enforcement is not perceived as consistent or strongly deterrent. The

implication is that rules may be seen as negotiable, reducing their preventive effect and potentially allowing repeat or serious violations without commensurate consequences.

Taken together, these lowest and middling scores imply that the division should prioritize: formalizing and tightening disclosure and recusal mechanisms; strengthening investigation and documentation of suspected conflicts; institutionalizing regular ethics and anti-conflict-of-interest orientations; and ensuring consistent, transparent application of disciplinary measures. Doing so would move the area from basic “Compliant” to “Highly Compliant,” better protecting procurement decisions from bias, reinforcing a culture of integrity, and enhancing stakeholder trust in the fairness and impartiality of procurement outcomes.

Table 9 shows the legal compliance in terms of monitoring.

Table 9 Monitoring

9. Monitoring	Weighted Mean	Verbal Description
1. Regular audits or reviews are conducted to assess procurement compliance with legal standards.	3.47	Highly Compliant
2. Findings from compliance monitoring are acted upon promptly through management interventions.	3.53	Highly Compliant
3. Performance indicators or compliance checklists are used to guide procurement activities.	3.53	Highly Compliant
4. Staff are encouraged to report lapses or challenges in legal compliance without fear of reprisal.	3.53	Highly Compliant
5. Audit results are shared with relevant stakeholders and used to improve procurement processes.	3.3	Highly Compliant
Overall Weighted Mean	3.47	Highly Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The results indicate that procurement monitoring is a clear strength area, with mechanisms not only in place but perceived as active, responsive, and participatory. The high overall rating suggests a mature feedback-and-correction loop that supports continuous improvement in legal compliance.

The overall weighted mean of 3.47, interpreted as “Highly Compliant,” shows that monitoring functions are consistently implemented and embedded in the division’s procurement practices. This implies that compliance is not treated as a one-time requirement but as an ongoing process, where data from reviews, audits, and frontline feedback are regularly used to

check alignment with legal standards and improve processes over time.

The highest means (all 3.53, “Highly Compliant”) are for Item 2: “Findings from compliance monitoring are acted upon promptly through management interventions.” Item 3: “Performance indicators or compliance checklists are used to guide procurement activities.” Item 4: “Staff are encouraged to report lapses or challenges in legal compliance without fear of reprisal.”

These scores show that monitoring is not merely ceremonial: results are translated into timely managerial action; structured tools (indicators, checklists) are used to guide daily work; and a relatively open, non-punitive environment exists for raising issues. The implication is that the division has a functioning learning and control system where monitoring information actually changes behavior and processes, and where staff participation in surfacing compliance issues is enabled—conditions that significantly reduce the risk of persistent or systemic non-compliance.

The lowest mean, though still “Highly Compliant,” is 3.30 for Item 5 (“Audit results are shared with relevant stakeholders and used to improve procurement processes”), followed by 3.47 for Item 1 (“Regular audits or reviews are conducted to assess procurement compliance with legal standards”). This pattern suggests that while audits/reviews are regular and generally well valued, there is slightly less perceived consistency in how their results are disseminated and concretely translated into visible, documented process improvements. The implication is that the division may further strengthen transparency and organizational learning by: more systematically sharing audit/monitoring results with all concerned units; explicitly documenting corrective and preventive actions; and tracking follow-through. Doing so would enhance ownership of reforms across staff, reinforce trust among internal and external stakeholders, and fully leverage monitoring as a driver of continuous enhancement in procurement compliance.

The legal compliance in terms of continuous improvement is presented in Table 10.

Table 10 Continuous Improvement

10. Continuous Improvement	Weighted Mean	Verbal Description
1. Staff feedback is solicited to identify compliance barriers and suggest improvements.	3.17	Compliant
2. The division uses lessons learned from past procurement activities to enhance compliance.	3.33	Highly Compliant
3. Updates to procurement guidelines are communicated clearly and adopted in a timely manner.	3.2	Compliant
4. Staff are motivated to participate in discussions on policy and process improvement.	3.1	Compliant
5. Training modules are updated based on error trends and new legal requirements.	3.4	Highly Compliant
Overall Weighted Mean	3.24	Compliant

Legend: 3.26-4.00 – Highly Compliant; 2.50-3.25 – Moderately Compliant; 1.75-2.49 – Compliant; 1.00-1.74 – Non-Compliant

The results show that continuous improvement in procurement compliance is present but not yet strong or fully embedded, with mixed ratings across the indicators. Overall, mechanisms exist for learning and updating practices, but staff engagement and communication of changes appear to lag behind more technical or formal aspects.

The overall weighted mean of 3.24, interpreted as “Compliant,” indicates that continuous improvement efforts meet only the basic acceptable level rather than a “Highly Compliant” standard. This suggests that while the division does engage in some review, learning, and updating of practices, these are not yet systematic, proactive, or consistently experienced by staff as an integral part of the compliance culture.

The highest mean is 3.40 (“Highly Compliant”) for Item 5 (“Training modules are updated based on error trends and new legal requirements”), followed by 3.33 (“Highly Compliant”) for Item 2 (“The division uses lessons learned from past procurement activities to enhance compliance”). These scores indicate that, at the technical-content level, the division shows strength in drawing from experience and regulatory changes to refine training and practice. The implication is that there is an effective feedback loop from observed errors and legal updates into learning materials and procedural enhancements, which helps keep training relevant and responsive to actual risks and evolving rules.

The lowest means fall under the “Compliant” category and reveal the weaker side of the continuous improvement environment: Item 4 (3.10): “Staff are motivated to participate in discussions on policy and process improvement.”. Item 1 (3.17): “Staff

feedback is solicited to identify compliance barriers and suggest improvements.”. Item 3 (3.20): “Updates to procurement guidelines are communicated clearly and adopted in a timely manner.”

These results suggest that continuous improvement is perceived as relatively top-down: technical updates occur, but staff do not always feel actively engaged, fully consulted, or clearly informed. The implication is that the division may be missing opportunities to harness frontline insights and to strengthen ownership of changes. To move from basic “Compliant” to “Highly Compliant,” management would need to: more systematically solicit and act on staff feedback (e.g., structured debriefs, feedback channels); improve clarity and timeliness in communicating guideline updates; and create more visible avenues and incentives for staff participation in policy and process discussions. Doing so would align the strong technical learning mechanisms (high scores on Items 2 and 5) with a stronger participatory culture, leading to more sustainable and widely shared improvements in procurement compliance.

2. The challenges in the Legal Compliance of Project Procurement

The challenges in the legal compliance of project procurement in terms of documentation quality is presented in Table 11.

Table 11 Documentation Quality

Key Areas		
1. Documentation Quality	Weighted Mean	Verbal Description
1. Procurement documents are sometimes submitted with missing or incomplete requirements.	2.57	Challenging
2. Errors in documentation often lead to delays or additional review cycles.	3.03	Challenging
3. Staff struggle to verify the accuracy of all forms and supporting papers before submission.	2.63	Challenging
4. Inconsistent filing and record-keeping can result in audit findings or lost documentation.	3.17	Challenging
5. Changes to forms and guidelines are not always communicated promptly, causing confusion.	2.73	Challenging
Overall Weighted Mean	2.83	Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

The overall weighted mean of 2.83 (“Challenging”) indicates that documentation problems are a persistent but not yet “crisis-level” barrier, suggesting recurring operational frictions rather than isolated issues. Incomplete submissions (Item 1, 2.57), difficulty verifying accuracy (Item 3, 2.63), and

delayed communication of form and guideline changes (Item 5, 2.73) all being “Challenging” imply that staff struggle to keep documentation complete, accurate, and aligned with evolving requirements. These difficulties are consistent with national findings that weak documentation and unclear or changing requirements contribute to delays and audit observations in public procurement.

The highest mean is 3.17 for Item 4 (“Inconsistent filing and record-keeping can result in audit findings or lost documentation”), rated “Challenging,” highlighting that record management and filing are seen as the most problematic aspect of documentation. This implies elevated risk of adverse COA audit remarks and difficulty reconstructing procurement trails, which undermines transparency and accountability. The implication is a need for standardized filing protocols, document checklists, and possibly digital archiving solutions to reduce audit exposure and improve traceability.

Table 12 shows the challenges in the legal compliance of project procurement in terms of personnel workload.

Table 12 Personnel Workload

2. Personnel Workload	Weighted Mean	Verbal Description
1. There are not enough qualified personnel to handle procurement documentation efficiently.	2.9	Challenging
2. Excessive workloads make it difficult to meet strict deadlines for procurement activities.	3.13	Challenging
3. Preparation of compliance reports is delayed due to staffing constraints.	3.17	Challenging
4. Burnout among staff affects attention to detail and legal compliance.	3.07	Challenging
5. High staff turnover leads to frequently retraining and onboarding new personnel.	3.27	Highly Challenging
Overall Weighted Mean	3.17	Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

The overall mean of 3.17 (“Challenging”) suggests that workload and staffing levels are a significant constraint on effective compliance work. High staff turnover is rated 3.27 (“Highly Challenging”) in Item 5, indicating that constant retraining and onboarding are particularly burdensome. This aligns with RA 9184’s emphasis on professionalization and sustained capacity-building for BAC and procurement units—requirements that are harder to meet when turnover is high and manpower is thin.

Other items—insufficient qualified personnel (2.90), excessive workloads (3.13), delayed compliance reports (3.17), and burnout affecting attention to detail (3.07)—all in the “Challenging” band—imply that even trained staff may not have enough time and energy to comply rigorously with detailed legal and documentary standards. The implication is that management may need to consider workload rationalization, hiring or designating dedicated procurement staff, or even engaging procurement agents where legally allowed when internal capacity is insufficient.

The challenges in the legal compliance of project procurement in terms of training is presented in Table 13.

Table 13 Training

3. Training	Weighted Mean	Verbal Description
1. Some staff lack adequate training on the latest procurement laws and guidelines.	3.03	Challenging
2. Limited opportunities for workshops or briefings hinder knowledge development.	3.4	Highly Challenging
3. Uncertainty about the correct application of legal rules affects compliance decisions.	3.4	Highly Challenging
4. Errors in practice are often due to insufficient understanding of compliance requirements.	3.43	Highly Challenging
5. Not all employees are aware of updates or revisions to internal procurement policies.	3.3	Highly Challenging
Overall Weighted Mean	3.31	Highly Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

Training has the highest overall mean among the challenge tables at 3.31 (“Highly Challenging”), signaling that capability development is a critical pain point. Nearly all statements are “Highly Challenging”: limited workshops/briefings (Item 2, 3.40), uncertainty in applying legal rules (Item 3, 3.40), errors due to insufficient understanding (Item 4, 3.43), and gaps in awareness of policy updates (Item 5, 3.30). Only Item 1 (3.03) is “Challenging,” still reflecting notable training gaps.

These results underscore a mismatch between the complexity and evolving nature of procurement rules and the training support available, despite RA 9184 and its IRR explicitly mandating sustained training programs for BACs and procurement personnel. The implication is that intensified, continuous, and more targeted training—possibly blended with e-learning or modular formats—should be treated as a priority intervention, since inadequate training is strongly linked to errors, delays, failed bids, and inconsistent interpretation of rules.

Table 14 presents challenges in the legal compliance of project procurement in terms of internal systems.

Table 14 Internal Systems

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-

4. Internal Systems	Weighted Mean	Verbal Description
1. Existing procurement systems do not fully support digital documentation and tracking.	2.9	Challenging
2. Outdated software or templates create inefficiencies and errors in compliance.	3.33	Highly Challenging
3. Lack of integration between systems makes it difficult to consolidate records.	3.33	Highly Challenging
4. Tools needed for monitoring compliance are rarely upgraded or improved.	2.93	Challenging
5. Technical issues with systems sometimes cause missed deadlines or incomplete submissions.	3.27	Highly Challenging
Overall Weighted Mean	3.15	Challenging

1.74 – Not a Challenge

The overall mean of 3.15 (“Challenging”) shows that technology and systems are a substantial barrier, particularly in terms of integration and up-to-dateness. Outdated software/templates (Item 2, 3.33), lack of integration between systems (Item 3, 3.33), and system issues causing missed deadlines (Item 5, 3.27) are all “Highly Challenging,” pointing to systemic ICT and process design weaknesses.

Items on limited digital documentation and tracking (2.90) and infrequent upgrades of tools (2.93) are also “Challenging,” suggesting that the shift to more automated, RA 9184-aligned e-procurement and documentation has not been fully realized, despite policy pushes for electronic systems. The implication is that investing in integrated procurement and records systems, standard electronic forms, and automated tracking could significantly reduce errors, eliminate redundant manual work, and improve compliance with timelines and documentation standards.

The challenges in the legal compliance of project procurement in terms of process timeliness is shown in Table 15.

Table 15 Process Timeliness

5. Process Timeliness	Weighted Mean	Verbal Description
1. Meeting the prescribed procurement process timeline is often a major challenge.	3.03	Challenging
2. Last-minute changes or disruptions to schedules risk non-compliance with legal deadlines.	3.3	Highly Challenging
3. Staff lack the time resources needed for thorough review and checks.	3.13	Challenging
4. Procurement activities are sometimes rushed, compromising completeness and accuracy.	3.03	Challenging
5. Delays in earlier stages of procurement cascade into later stages and contract implementation.	3.4	Highly Challenging
Overall Weighted Mean	3.18	Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

The overall mean of 3.18 (“Challenging”) indicates that meeting legal timelines is one of the most difficult operational areas. Last-minute changes risking non-compliance with deadlines (Item 2, 3.30) and cascading delays from early stages into contract implementation (Item 5, 3.40) are “Highly Challenging,” reflecting national observations that lengthy, multi-stage processes with many signatories and requirements often cause bottlenecks.

Other items, difficulty meeting prescribed timelines (3.03), lack of time for thorough review (3.13), and rushed activities compromising completeness and accuracy (3.03)—all show that staff are often forced to choose between speed and quality. The implication is that process mapping, early planning (e.g., timely APP and PPMP preparation), clearer scheduling, and reducing unnecessary internal layers could help ensure legal timelines are met without sacrificing documentation quality.

Table 16 shows the challenges in the legal compliance of project procurement in terms of feedback mechanisms.

Table 16 Feedback Mechanisms

6. Feedback Mechanisms	Weighted Mean	Verbal Description
1. Compliance audits reveal recurring gaps that are not quickly resolved.	2.96	Challenging
2. Feedback from audits and complaints takes time to be addressed by management.	2.83	Challenging
3. Some issues highlighted during monitoring are repeated due to lack of follow-through	3.03	Challenging
4. Staff are not always encouraged or rewarded for reporting compliance challenges.	2.87	Challenging
5. External audits bring to light systemic challenges not noticed in routine operations.	2.96	Challenging
Overall Weighted Mean	2.93	Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

With an overall mean of 2.93 (“Challenging”), feedback and corrective loops are present but not strong enough to rapidly resolve recurring issues. All items are “Challenging”: recurring gaps not quickly resolved (2.96), slow response to audit/complaint feedback (2.83), repeated issues due to lack of follow-through (3.03), limited encouragement/reward for reporting challenges (2.87), and external audits revealing systemic problems missed internally (2.96).

This pattern suggests that while audits and monitoring exist, the response cycle—analyzing findings, assigning responsibility, implementing corrective actions, and checking follow-through—is slow or incomplete. The implication is that establishing stronger management action plans, clear timelines for closing findings, and more positive incentives for reporting issues is crucial to prevent the same compliance weaknesses from recurring year after year.

The challenges in the legal compliance of project procurement in terms of support services is shown in Table 17.

Table 17 Support Services

7. Support Services	Weighted Mean	Verbal Description
1. There is not enough budget for procuring necessary compliance tools and materials.	2.7	Challenging
2. Administrative support for training and documentation is limited	2.67	Challenging
3. Staff request more access to legal experts or technical consultants.	2.93	Challenging
4. Resource constraints affect the ability to keep up with compliance requirements.	3.2	Challenging
5. Improvements in support systems are delayed due to budget or approval processes.	3.1	Challenging
Overall Weighted Mean	2.92	Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

The overall mean of 2.92 (“Challenging”) indicates that support functions and resources are not fully adequate to sustain high compliance. All statements fall within “Challenging”: insufficient budget for tools and materials (2.70), limited administrative support for training and documentation (2.67), need for more access to legal/technical experts (2.93), resource constraints affecting ability to keep up with requirements (3.20), and delays in support system improvements due to budget/approvals (3.10).

These results imply that even if line staff are willing and policy frameworks are in place, support in terms of funding, admin assistance, and expert advice is not consistently sufficient. This is significant because RA 9184 reforms assume that entities will have an enabling environment—resources, tools, and expert support—to implement the law effectively. The implication is that management should advocate for and prioritize budget and organizational support for procurement (e.g., earmarked funds for tools and capacity-building, formal access to legal/technical advisors), to ensure that compliance expectations are matched by the necessary inputs.

Table 18 shows the challenges in the legal compliance of project procurement in terms of conflict management.

Table 18 Conflict Management

8. Conflict Management	Weighted Mean	Verbal Description
1. Identifying and disclosing conflicts of interest is not consistently practiced.	2.9	Challenging
2. Complaints about favoritism or bias are not always acted upon promptly.	2.97	Challenging
3. There is confusion on proper procedures for handling procurement grievances.	2.93	Challenging
4. Tools for managing and recording conflicts are inadequate.	2.9	Challenging
5. Conflict management guidelines need more clarity and enforcement.	3.17	Challenging
Overall Weighted Mean	2.97	Challenging

Legend: 3.26-4.00 – Highly Challenging; 2.50-3.25 – Challenging; 1.75-2.49 – Moderately Challenging; 1.00-1.74 – Not a Challenge

The overall mean of 2.97 (“Challenging”) shows that managing conflicts of interest, favoritism, and grievances remains a vulnerable area. All items are “Challenging”: inconsistent identification and disclosure of conflicts (2.90), slow action on favoritism/bias complaints (2.97), confusion about grievance procedures (2.93), inadequate tools for managing/recording conflicts (2.90), and the need for clearer and better enforced guidelines (3.17).

This pattern indicates that integrity-related mechanisms are perceived as weaker than they need to be in a high-risk function like procurement, echoing broader concerns in the Philippine context about transparency and conflict management in public contracting. The implication is that clearer, well-communicated conflict-of-interest policies, standardized disclosure tools, explicit grievance procedures, and consistent enforcement are essential to protect decision-making from bias, build stakeholder trust, and align with international good practices on integrity in procurement.

Overall, the set of tables portrays an organization that is legally required to operate under a modernized procurement framework but faces interlocking challenges in documentation, staffing, training, systems, timelines, feedback, support, and conflict management, issues also highlighted in national studies and RA 9184 implementation assessments. Addressing these areas in an integrated way, through capacity-building, process and systems redesign, strengthened internal controls, and targeted resource

support, would be critical to moving from “Challenging” to “Moderately Challenging” or “Not a Challenge” over time

Across all eight dimensions, the findings show that respondents experience procurement compliance as broadly challenging, with some domains already at a “Highly Challenging” level, especially training, timeliness, and internal systems. These patterns mirror typical constraints in Philippine public procurement such as limited training, capacity gaps, documentation issues, and lengthy or complex processes identified in recent literature and assessments.

3. Significant relationship between legal compliance and challenges in the project procurement.

Table 19

Test of Correlation Between the Legal Compliance and Challenges in the Legal Compliance of Project Procurement

		Doc Quality	Personnel Workload	Training	Internal Systems	Process Timeliness	Feedback Mechanism	Support Services	Conflict Mngt
Knowledge of laws	Pearson Correlation	0.001	0.107	.531	.432	.411	0.08	0.19	0.104
	Sig. (2-tailed)	0.996	0.575	0.003	0.017	0.024	0.673	0.314	0.586
	N	30	30	30	30	30	30	30	30
Internal Controls	Pearson Correlation	-0.108	0.088	0.291	0.255	0.32	-0.14	-0.103	-0.148
	Sig. (2-tailed)	0.569	0.645	0.119	0.174	0.084	0.46	0.588	0.435
	N	30	30	30	30	30	30	30	30
Transparency	Pearson Correlation	-0.054	0.147	0.15	0.127	0.046	-0.355	-0.352	-.365
	Sig. (2-tailed)	0.775	0.439	0.429	0.503	0.808	0.054	0.057	0.047
	N	30	30	30	30	30	30	30	30
Supplier compliance	Pearson Correlation	-0.073	0.089	0.011	0.269	0.254	-0.143	-0.175	-0.342
	Sig. (2-tailed)	0.703	0.639	0.955	0.15	0.176	0.45	0.355	0.064
	N	30	30	30	30	30	30	30	30
Procurement Capability	Pearson Correlation	-0.008	0.067	0.176	0.22	0.225	-0.148	-0.114	-0.157
	Sig. (2-tailed)	0.968	0.726	0.352	0.243	0.232	0.436	0.549	0.408
	N	30	30	30	30	30	30	30	30
Legal Procedures & Bidding	Pearson Correlation	-0.063	0.096	0.1	0.237	0.263	-0.181	-0.185	-0.313
	Sig. (2-tailed)	0.74	0.614	0.6	0.207	0.161	0.339	0.329	0.092
	N	30	30	30	30	30	30	30	30
Contract Mngt	Pearson Correlation	-0.042	0.091	0.189	0.298	0.203	-0.126	-0.109	-0.275
	Sig. (2-tailed)	0.827	0.633	0.318	0.109	0.282	0.509	0.568	0.141
	N	30	30	30	30	30	30	30	30
Conflict of Interest Mngt	Pearson Correlation	-0.14	-0.04	-0.128	0.222	0.134	-0.171	-0.139	-.407
	Sig. (2-tailed)	0.462	0.832	0.5	0.238	0.479	0.365	0.465	0.025
	N	30	30	30	30	30	30	30	30
Monitoring	Pearson Correlation	-0.053	0.056	0.239	.400	0.282	-0.012	0.035	-0.196
	Sig. (2-tailed)	0.78	0.768	0.204	0.028	0.131	0.95	0.855	0.3
	N	30	30	30	30	30	30	30	30
Continuous Improvement	Pearson Correlation	-0.085	-0.039	0.02	0.159	0.03	-0.2	-0.152	-0.331
	Sig. (2-tailed)	0.655	0.839	0.918	0.4	0.876	0.289	0.422	0.074
	N	30	30	30	30	30	30	30	30

Only a few legal compliance dimensions show significant relationships with procurement challenges, while most correlations are weak and not significant. Knowledge of laws is significantly and positively related to Training ($r = .531, p = .003$), Internal Systems ($r = .432, p = .017$), and Process Timeliness ($r = .411, p = .024$), indicating these challenge areas are closely linked with law-related compliance. Transparency is significantly and negatively related to Conflict Management ($r = -.365, p = .047$), and Conflict of Interest Management is also significantly and negatively related to Conflict Management ($r = -.407, p = .025$), suggesting conflict issues may weaken integrity-related compliance. Monitoring is significantly and positively related to Internal Systems ($r = .400, p = .028$), implying that system improvements may also strengthen monitoring.

The findings suggest that links between legal compliance and procurement challenges are concentrated in a few areas—particularly knowledge of laws, internal systems, timeliness, and conflict-related issues—rather than spread across all compliance dimensions. The positive associations of knowledge of laws with training, internal systems, and process timeliness indicate that these factors tend to move together in practice, so integrated actions that improve training delivery, stabilize/streamline internal processes, and reduce delays are likely to yield the greatest gains in law-related competence and consistency, although the results remain correlational and do not establish causality.

In contrast, the negative relationships involving conflict management imply a governance risk: as conflict-management challenges increase, transparency and conflict-of-interest management tend to weaken. This supports strengthening conflict-resolution pathways, disclosure/recusal rules, documentation of decisions, and accountability measures, treating these as core compliance controls rather than purely interpersonal concerns.

Because most other relationships are non-significant, broad “across-the-board” reforms may be inefficient; instead, the priority should be to act first where linkages are clearest (training–systems–timeliness and conflict management) and use targeted

diagnostics (e.g., process mapping, document review, focused interviews) to explain weaker or inconsistent patterns elsewhere. In interpreting directions and implications, it is also essential to state how the challenge scales were coded (higher = more challenge vs higher = better condition), since that affects the practical reading of positive versus negative relationships.

Training is highly challenging despite relatively high compliance means, suggesting basic legal awareness exists but depth and consistency are uneven, which can manifest as slow, risk-averse processing and documentation errors. Workload remains challenging even with strong compliance ratings, implying staff are maintaining compliance under strain but may face higher long-run risk of delays and errors without staffing reinforcement. Internal systems and timeliness are also challenging despite high adherence ratings, implying compliance is often achieved through manual workarounds that increase vulnerability to missed deadlines and incomplete records when workloads surge or systems fail.

IV. CONCLUSION

Based on the findings, the following were drawn:

1. Legal compliance in procurement is generally high, with respondents showing strong familiarity with procurement laws and the ability to apply legal requirements across key procurement activities. Internal control practices are viewed as robust and consistently implemented. At the same time, compliance related to transparency, conflict-of-interest management, and continuous improvement appears less consistently strong, implying that while procedural compliance is largely observed, governance-oriented practices such as disclosure, impartiality perceptions, grievance handling, ethical safeguards, and participatory improvement mechanisms still require strengthening.

2. Project procurement units experience persistent challenges that can complicate consistent legal compliance, particularly in areas involving documentation, staffing capacity, systems, and timelines. Documentation-related problems reflect recurring issues in completeness, accuracy, filing consistency, and the timely communication of

changing forms and guidelines, which can lead to delays and increase audit vulnerability. Workload pressures and staffing constraints, including turnover and competing responsibilities, further strain compliance efforts, while limitations in internal systems and process timeliness suggest that outdated tools, inefficiencies, and schedule disruptions can create bottlenecks that heighten the risk of procedural lapses despite staff efforts to follow rules.

3. Legal compliance and procurement challenges are significantly related, meaning that the conditions that make procurement difficult also influence how consistently and effectively legal requirements are met. When challenges such as training gaps, heavy workload, weak documentation practices, system limitations, and time pressures persist, compliance becomes harder to sustain uniformly across all stages and is more likely to show weaknesses in areas requiring strong governance culture such as transparency, conflict-of-interest safeguards, and continuous improvement. Conversely, when these operational and capability barriers are addressed, compliance is more likely to be implemented not only as a procedural requirement but also as a stable and proactive organizational practice.

4. Legal compliance in project procurement is influenced by a limited set of interrelated challenge areas rather than by broad, uniform drivers across all compliance dimensions. Significant associations show that law-related compliance aligns closely with training adequacy, the strength of internal systems, and process timeliness. At the same time, the negative links between conflict-management challenges and both transparency and conflict-of-interest management highlight a clear governance risk. Since most other relationships are not significant, sweeping reforms may be inefficient; instead, targeted interventions focused on training, systems improvement, timeliness controls, and conflict-governance mechanisms, supported by follow-up diagnostics to explain other weak or inconsistent areas by offering the most evidence-based direction for strengthening procurement compliance.

Recommendations based on the results of the study.

Based on the conclusions, the following are offered:

1. Strengthen transparency

- Institutionalize proactive disclosure by adopting a standard publication schedule and template for procurement plans, bid opportunities, notices of award, and contract status updates through official channels.
- Standardize grievance handling by creating a clear, step-by-step complaints workflow (receipt, logging, acknowledgement, evaluation, resolution, feedback) with defined turnaround times and accountable focal persons.
- Reduce perceived bias by requiring written, criteria-based justifications for key decisions (e.g., post-qualification outcomes, bid disqualifications, award recommendations) and ensuring these are consistently documented and reviewable.

2. Improve conflict-of-interest controls

- Require periodic conflict-of-interest declarations for all procurement actors (BAC, TWG, end-users, inspectors), including renewal at key stages (pre-bid, evaluation, award, inspection/acceptance).
- Enforce recusal and replacement procedures using a simple trigger-and-action rule (when a conflict is declared or identified, the member is automatically excluded from deliberation and signing for that activity).
- Conduct regular ethics briefings focused on practical scenarios (gifts, hospitality, relationships with bidders, post-employment risks), and integrate them into onboarding for new staff to address turnover-related exposure.

3. Institutionalize continuous improvement

- Implement post-procurement reviews after major procurements (what worked, what delayed, what caused errors), then translate findings into a short corrective-and-preventive action plan with owners and deadlines.
- Create a structured staff feedback channel (monthly huddles or quick digital forms)

specifically targeting compliance barriers, bottlenecks, and unclear requirements, and report back the actions taken to build participation.

- Maintain an “updates registry” for legal/agency guideline changes and ensure dissemination via brief bulletins, short refresher sessions, and updated checklists to reduce confusion over revised forms and rules.

4. Fix documentation weaknesses

- Deploy stage-based document checklists (planning, bidding, award, contract signing, implementation, payment) and require checklist sign-off before a file moves to the next stage.
- Establish a centralized filing protocol with naming conventions, version control, and mandatory indexing; assign a custodian per project file to prevent lost or inconsistent records.
- Move toward digital archiving (scanned signed copies, controlled-access folders, and backup routines) to strengthen audit readiness and retrieval speed.

5. Address workload and staffing constraints

- Conduct workload mapping to identify peak periods and recurring bottlenecks, then adjust role assignments (e.g., designate alternates for BAC secretariat functions and document control).
- Adopt continuity measures to mitigate turnover (standard operating procedures, templates, onboarding kits, and mentoring or “buddy” systems for new procurement staff).
- Where possible, recommend staffing augmentation or formal designation of dedicated procurement support personnel, justified by compliance risk reduction, audit exposure, and cycle-time improvement.

6. Upgrade systems and improve timeliness

- Review process cycle times and set service-level targets per procurement stage, then monitor delays through a simple dashboard or tracker that flags aging documents and pending approvals.

- Update tools and templates regularly (forms, evaluation matrices, minutes templates, contract templates) and keep them in a single authoritative repository to avoid inconsistent versions.
- Strengthen coordination mechanisms (calendar-based procurement planning, pre-procurement conferences, and early end-user engagement) to reduce last-minute changes that trigger rework and noncompliance risk.

7. Link training to compliance risks

- Shift training from generic orientations to targeted, role-based modules (BAC, TWG, end-users, inspectors, finance) emphasizing common error points (documentation completeness, timelines, eligibility checks, clarifications, disclosure).
- Use microlearning and refreshers tied to actual audit findings, recurring delays, and observed documentation errors, ensuring training directly addresses the challenges that weaken compliance.
- Evaluate training impact by tracking reductions in repeated errors, fewer returned documents, faster cycle times, and improved audit results rather than attendance alone.

8. Governance and accountability measures

- Assign clear ownership for each risk area (transparency, conflict-of-interest, documentation control, systems, training) and require periodic internal reporting on compliance indicators and corrective actions.
- Integrate compliance checks into internal controls already perceived as strong, ensuring they explicitly cover the weaker governance areas (disclosure, complaints handling, conflict-of-interest enforcement, and improvement actions).
- Reinforce a non-punitive reporting culture for compliance lapses while applying consistent administrative action for verified misconduct, balancing learning with accountability.

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