

# AN ASSESSMENT OF THE ECF-SUPPORTED PROGRAM WITH THE FUND: MONETARY POLICY PERFORMANCE APRIL 2015 – APRIL 2016

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## **1.1 Introduction and background**

The primary objective of monetary policy in Ghana, as enshrined in the Bank of Ghana Act 2002 (Act612), is the maintenance of stability of the general level of prices. Without prejudice to its primary objective and independently of instructions from Government or any other authority, the Bank of Ghana (BoG) is expected to support the general economic policy of Government and promote economic growth and effective and efficient operation of the banking and credit systems in the country. Upon the enactment by Parliament of the Act, the BoG gained instrument independence – free to choose monetary policy instruments to carry out its mandate.

The Act provides for the Government to obtain some monetary accommodation to finance its activities. It sets a ceiling of 10 per cent of the preceding year's government revenue for net domestic financing (NDF) of the current year's deficit. All too often, however, the BoG has acted as if the ceiling was set for it alone. Indeed there have been instances where BoG financing of the budget has exceeded the ceiling. For example, at end-September 2014 BoG financing of the 2014 budget stood at an estimated 23 percent of 2013 government revenue. As discussed below this behaviour of the BoG is a reflection of 'fiscal dominance of monetary policy'.

In May 2007 after five years of informal Inflation Targeting (IT), the BoG formally adopted IT as its monetary policy framework. Unfortunately, however, the global financial crisis of 2007-2008 imparted large adverse shocks on the economy making successful implementation of IT practically impossible.

Over the years fiscal dominance of monetary policy has been a persistent characteristic of the macroeconomic policy environment. Large fiscal deficits under tight market financing conditions have typically resulted in monetization of the deficit. The monetization, in turn, has undermined the BoG's pursuit of the monetary policy mandate in its statutes. Literally the BoG abandons – voluntarily or otherwise - its primary objective of inflation control to accommodate the financing requirements of the fiscal authority. As a result Ghana has had a tendency of running double-digit inflation.

In order to firmly establish the effectiveness of the IT framework, the Bank of Ghana Act needs to be amended – structural benchmark for December 2015. The required amendment seeks to significantly strengthen the BoG's functional autonomy, governance and ability to respond to banking sector crisis situations. Strengthening governance provisions in the new Act is to ensure the personal autonomy of key management, Board and audit committee members of the bank. The provisions in the new Act are aimed at the elimination of fiscal dominance of monetary policy. In the interim, i.e. until the enactment of the new BoG Act, a memorandum of understanding (MOU) was to be signed between the Ministry of Finance

and the BoG – as prior action - establishing a ceiling for monetary financing of the 2015 budget at 5 percent of the 2014 budget revenue. The MOU “also formalized that from 2016 onwards, a zero financing of government from the BoG would be in effect... **consistent with a modern IT framework**” (IMF Country Report No. 15/103 para. 74 page 65 emphasis added).

## **1.2 Developments over the period**

Under the IT framework, the MPC of the BoG pursues the inflation objective by raising or lowering the monetary policy rate (MPR) which is the BoG policy rate. Between May and November 2015 the policy rate was raised by 5 percentage points to 26 percent. The BoG also used all its available instruments to steer the overnight money market rate, the interbank rate, (IBR), close to the MPR – making the two strongly positively correlated – correlation coefficient of 0.77 (Text Table 1). The linear regression equation fitted for the MPR estimates an average monthly rise of 0.46 percent over the one-year period April 2015-April 2016. Similarly, the linear fit for the IBR estimates an average monthly rise of 0.16 percent over the same one-year period (both estimated coefficients are significant at the 5 percent level, Text Table 2).

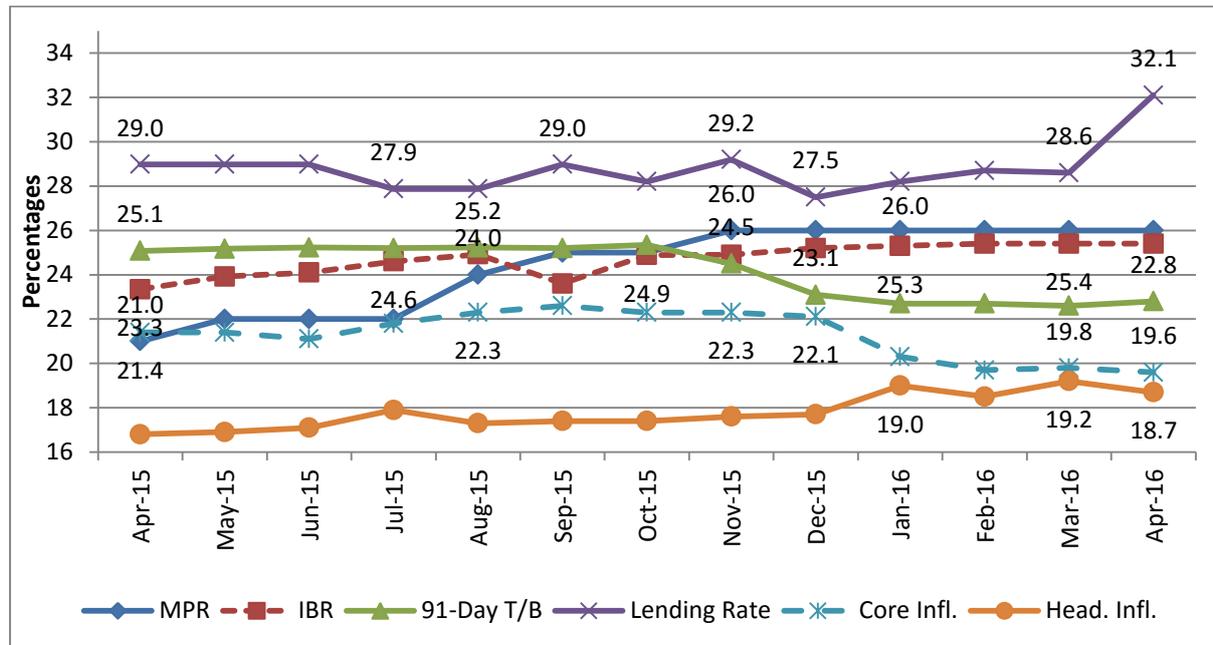
The monetary policy transmission mechanism includes the domestic bond and credit markets as well. In an effective IT framework, upon the raising of the policy rate, interest rates in money, bond, and credit markets would all rise in tandem. The elevated cost of funds in these markets is expected to impart downward pressure on borrowing quantities and through that to moderate domestic aggregate demand. Some moderation in credit growth has been reported over the period. This, however, has been more because of lending restraint by banks on account of the rising stock of non-performing loans (NPLs) and the implications of that on their balance sheets.

Under the program the BoG has ceased to be the manager of the domestic bond market and now only acts as an agent of the fiscal authority. As a result of this change, the room to factor monetary policy considerations into the operations of the domestic debt market has been much reduced if not totally eliminated. Chart 1 captures developments in the money, debt, and credit markets over the one-year period April 2015 to April 2016.

From the launch of the program in April 2015 to the end of the third quarter, the 91-day Treasury bill (T bill) rate hovered around 25 percent. In support of the program, the World Bank agreed a program with US\$150 million and a policy based guarantee (PBG) for up to US\$1.0 billion for the swap of previously contracted expensive loans with less expensive ones. After receipt of the proceeds of the PBG-backed US\$1.0 billion Eurobond, however, the fiscal authority intensified its liability management activities on the domestic debt market. As a result, the 91-day T bill rate trended down sharply making the T bill rate strongly negatively correlated with both the monetary policy and interbank rates – correlation coefficients of negative 0.72 and 0.75 respectively (Text Table 1). The fitted

linear regression estimates the trajectory as falling at an average monthly rate of 0.27 percent (statistically significant at the 5 percent level, Text Table 2). This is not consistent with a well-functioning monetary policy transmission mechanism in an effective IT framework.

**Chart 1: Monetary policy performance under the ECF backed program**



Source: BoG and CEPA Staff Estimates

On credit markets the average bank lending rate has trended weakly upwards. CEPA considers two key determinants of average bank lending rates. The first, the 91-day T-bill rate – proxy for the opportunity cost of bank lending to the private sector - trended downwards in line with the liability management objectives of the fiscal authority. Chief among these is securing of financing for the budget at minimum cost.

The second key determinant, the IBR – proxy for cost of funds to banks - trended upwards steered by the BoG to remain close to the MPR. The combined impact of the conflicting forces – declining T bill rate and rising IBR rate has been the weakly upward trend of the average bank lending rate. Text Table 1 shows the average bank lending rate weakly negatively correlated with the T bill rate – correlation coefficient of negative 0.22. The table also shows the average bank lending rate weakly positively correlated with the IBR – correlation coefficient of 0.03. The fitted linear regression estimates the average bank lending rate to have risen at an average monthly rate of 0.09 percent – not statistically significant. Thus the bank rate rose in spite of the downward pressure from a declining T bill rate – proxy for opportunity cost of bank lending to the private sector and rose with the rising IBR – proxy for cost of funds to banks.

**Table 1: Correlation Matrix Apr-15 - Apr-16**

	<i>MPR</i>	<i>IBR</i>	<i>91-Day T/B</i>	<i>Lending Rate</i>	<i>Core Infl.</i>	<i>Head. Infl.</i>
MPR	1					
IBR	0.77	1				
91-Day T/B	-0.72	-0.75	1			
Lending Rate	0.12	0.03	-0.22	1		
Core Infl.	-0.26	-0.48	0.76	-0.47	1	
Head. Infl.	0.70	0.79	-0.87	0.19	-0.73	1

Source: BoG and CEPA Staff Estimates

**Table 2: Regression Output for Monetary Variables with Time (Apr 2015-Apr 2016)**

Independent Variable	Dependent Variable				
	MPR	IBR	91-Day T-bill	Lending Rate	Head Infl.
<b>Intercept</b>	21.192 (44.444)*	23.578 (103.604)*	26.107 (71.730)*	28.16 (42.534)*	16.546 (71.161)*
<b>Time</b>	0.456 (7.591)*	0.159 (5.542)*	-0.27 (-5.881)*	0.089 (-1.065)	0.18 (6.152)*
<b>R Square</b>	0.84	0.736	0.759	0.094	0.775
<b>Adjusted R Square</b>	0.825	0.712	0.737	0.011	0.754

T-Statistics in parenthesis ( )

Significant at 0.05 \*

Effective IT also requires that raising policy rates leads to expectations of increased portfolio capital inflows as non-resident portfolio investors seek to take advantage of new high-yielding, longer-dated maturities on the domestic debt market. The expected portfolio capital inflows would thus help stabilize the currency in foreign exchange markets. Nominal exchange rate stability could imply real appreciation of the cedi. In turn, real appreciation could lead to increased supply of goods and services (from the tradable sector i.e. imports and exportables) on domestic markets. Together with moderated domestic aggregate demand, the improved supply on the domestic market may be expected to help bring inflation under control. Unfortunately the liability management objectives of the fiscal authority have been in the way and in the process rendered monetary policy ineffective thus far.

### 1.3 Headline Inflation and its Components

CEPA considers headline inflation in three components namely: food inflation, CEPA core inflation and year/year changes in administered prices.

The data for the period from the beginning of the program in April 2015 to June 2016 shows headline inflation on a rising trajectory (Chart 2). A linear regression fitted to the data estimated the time coefficient at 0.16 (statistically significant at the 5 percent level). In other words headline inflation has risen at an average monthly rate of 0.155 percent over the period (Text Table 3).

The data also showed that food inflation has followed a rising trajectory (Chart 2). A linear fitted regression estimated the slope at 0.099 percent (statistically significant at the 5 percent level). In other words, food inflation has risen at an average monthly rate of 0.099 percent over the period (Text Table 3).

Finally computed data for CEPA core inflation – defined to exclude food inflation as well as all administered prices, utility tariffs set by the Public Utilities Regulatory Commission (PURC) as well as transport charges set by the Ghana Private Road Transport Union (GPRTU). The BoG core inflation is different. It includes food inflation as well as transport fares set by the GPRTU. The computed CEPA core inflation has trended broadly downwards (Chart 2). The linear regression fit estimates the trend coefficient at negative 0.17 (statistically significant at the 5 percent level). In other words, CEPA core inflation has been falling at an average monthly rate of 0.17 percent over the period under consideration (Text Table 3).

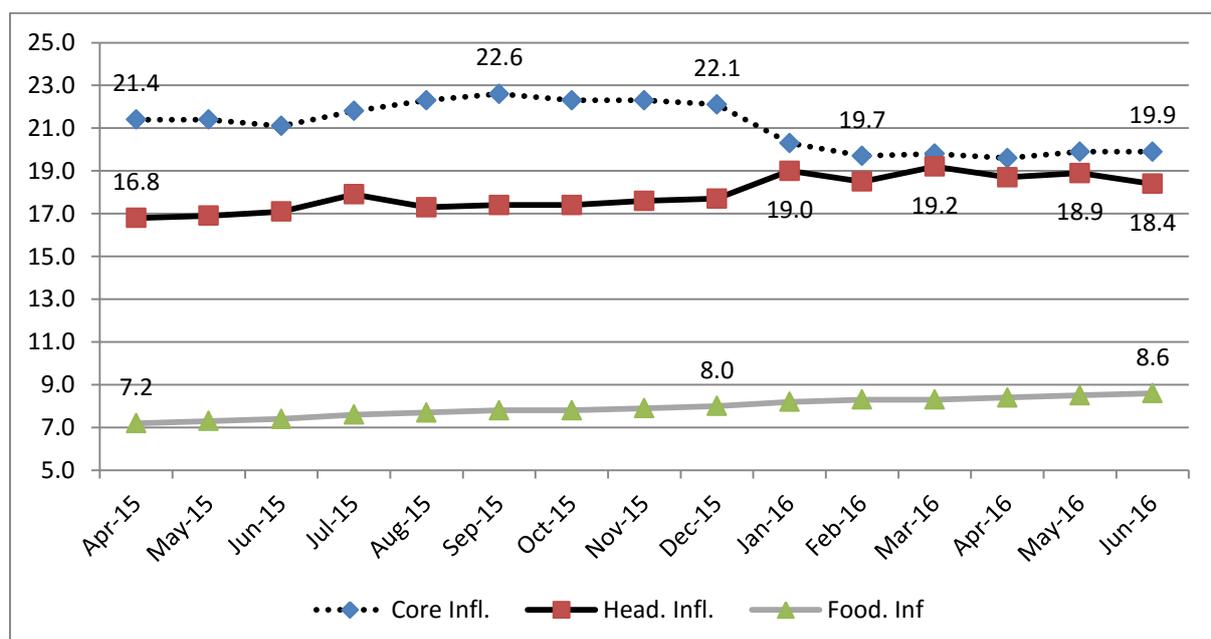
**Table 3: Regression Output for Headline Infl. and its Components (Apr 2015-June 2016)**

Independent Variable	Dependent Variable		
	Head line	Food	Core
<b>Intercept</b>	16.677 (74.173)*	7.145 (261.932)*	22.460 (48.124)*
<b>Time</b>	0.155 (6.282)*	0.099 (32.856)*	-0.170 (-3.311)*
<b>R Square</b>	0.752	0.988	0.457
<b>Adjusted R Square</b>	0.733	0.987	0.416

T-Statistics in parenthesis ( )

Significant at 0.05 \*

**Chart 2: Headline Inflation and its components**



The position of the IMF is that for the IT to be fully effective, the exchange rate must be flexible (IMF Country Report No. 07/210, June 2007, page 11 paragraph 21 and 22). The findings of a recent IMF Working Paper on the empirical evidence, however, are pertinent. To paraphrase it somewhat:

Management of the exchange rate greatly enhances the efficiency of IT. In a flexible exchange rate system, IT incurs a high risk of indeterminacy where macroeconomic fluctuations can be driven by self-fulfilling expectations. Moreover, small inflation shocks may escalate into much larger increases in inflation ex-post. Both of these problems disappear when **the central bank leans heavily against the wind in a managed float**. The fact, however, is that to be sustainable, such leaning requires adequately large international reserve buffers. Indeed the study notes that central banks that have followed this approach without adequate international reserve buffers, have seen the exchange rate regime collapse under speculative attacks. For the avoidance of doubt, it must be stressed that Ghana's gross international reserves are low – below the minimum of 4 months cover of imports (and still declining). This minimum needed for external sustainability has been independently determined by staffs of the BoG and the IMF.

Leaning against the wind of real depreciation pressure is therefore not being advocated here. It is simply not a policy option. The implications are nonetheless important. The cedi continues to be relatively stable to slightly depreciating in nominal terms. This has resulted in real exchange rate appreciation. From late June the rate of nominal depreciation has picked up. Real appreciation continues but at a reduced pace. This can impact adversely on core inflation.

The paper notes that the dominant view on exchange rate management is that the central bank should stay out of the forex market. Indeed, some even assert that a flexible, market-determined exchange rate is a precondition for successful adoption of IT.

It goes on: policymakers evidently disagree. Most emerging market and low-income countries subscribe to some sort of IT. Few, if any, however, allow the exchange rate to float freely. Despite the strictures of theory, interventions are frequent and large. The universal preference is to carefully manage the path of the exchange rate.

Opponents to IT argue that, among other things, IT implies high exchange rate volatility. They contend that the elevation of price stability to the status of primary goal of the central bank implies benign neglect of the exchange rate with potentially negative repercussions on exchange rate volatility and economic growth.

The study acknowledges that sometimes “benign neglect of the exchange rate” helps dampen inflationary shocks. The latest Regional Economic Outlook for SSA (REO April 2016 page 1) considers that SSA is not immune to the multiple transitions afoot in the global economy – ongoing transition in China, the region's major trade partner and increasingly

also a source of foreign direct investment and other financial flows and whose own current account balance has recently turned negative; substantial tightening of global financial conditions for most of the region’s frontier markets reflecting, in part, the inception of a gradual tightening of monetary policy in the US and a broader episode of financial volatility amid concerns about growth prospects in emerging markets. Furthermore, the prospects are an extended period of sharply lower commodity prices. Accordingly for a country like Ghana, outside any monetary union *exchange rate flexibility coupled with supportive policies should be the first line of defence.*

In developing countries, however, all too often, benign neglect of the exchange rate allows the initial shock to escalate through depreciation of the real exchange rate into a much larger shock resulting in a wide miss of the inflation target. (IMF Working Paper WP/16/55 March 2016 Marco, Airando et al “Inflation Targeting and Exchange Rate Management in Less Developed Countries”)

#### **1.4 Contributions to headline Inflation of the Components**

Crude estimates of contributions of the components to headline inflation (using base year weights) are estimated for each month of the second quarter of 2016. The results show that on account of the persistent rise in food inflation, its contribution to headline inflation has also risen over the period (Text Tables 4A, 4B, and 4C).

Weighted average year-on-year changes in administered prices and monthly contributions are also derived for each month of the second quarter (Text Tables 4A, 4B, and 4C). The significant development is the drop in the monthly contribution to headline inflation of administered prices for June. This is because of the fall in the imputed weighted average change in administered prices in June 2016 over June 2015. Transport charges were raised by the GPRTU in June 2015 but not in June 2016. June is a review month for the GPRTU. The upshot is a lower share of contribution of administered prices to headline inflation from the May value of 37.94 per cent to a June value of 36.07 per cent. The headline inflation fell from 18.9 per cent in May to 18.4 per cent in June – i.e. by 0.5 percentage points. By itself, the fall in change in administered prices lowered headline inflation by 0.6 percentage points – from a contribution of 0.072 percentage points to 0.066 percentage points – a difference of 0.006 percentage points. This was offset by the 0.001 percentage points increase from food inflation given no change in the contribution to inflation from core inflation (Text Tables 4A, 4B, and 4C).

**Text Table: 4A March 2016**

	<b>Weight (Base year)</b>	<b>Rate of Inflation Apr-16</b>	<b>Contribution</b>	<b>Shares of Contribution (%)</b>
<b>Food Inflation</b>	0.439	0.084	0.037	19.72
<b>Core Inflation</b>	0.402	0.196	0.079	42.17
<b>Administered prices</b>	0.159	0.448	0.071	38.11
<b>Headline Inflation</b>	<b>1.00</b>	<b>0.187</b>	<b>0.187</b>	<b>100.00</b>

Text Table: 4B May 2016

	Weight (Base year)	Rate of Inflation May-16	Contribution	Shares of Contribution (%)
Food Inflation	0.439	0.085	0.037	19.74
Core Inflation	0.402	0.199	0.080	42.32
Administered prices	0.159	0.451	0.072	37.94
Headline Inflation	<b>1.00</b>	<b>0.189</b>	<b>0.189</b>	<b>100.00</b>

Text Table: 4C June 2016

	Weight (Base year)	Rate of Inflation Jun-16	Contribution	Shares of Contribution (%)
Food Inflation	0.439	0.086	0.038	20.52
Core Inflation	0.402	0.199	0.080	43.41
Administered prices	0.159	0.417	0.066	36.07
Headline Inflation	<b>1.00</b>	<b>0.184</b>	<b>0.184</b>	<b>100.00</b>

Chart 2 also shows that CEPA core inflation has broadly trended downwards over the period. CEPA analysis suggests that its core is driven by the bilateral (cedi/US\$) real exchange rate (RER). Since July 2015 the RER has generally appreciated and more steeply from early 2016. Given the low international reserve buffers the sustainability of continued RER appreciation has been in doubt. Indeed from late June there has been a slowdown in the rate of RER appreciation. If the trend is not halted, core inflation would join food inflation to drive headline inflation upward neutralizing the positive effect of administered price inflation and in the absence of any further tightening of macroeconomic policies, could keep end-year inflation at about 18.0 percent.

### 1.5 The monetary Policy Consultation Clause (MPCC)

A monetary policy consultation clause (MPCC) has been instituted for the monitoring of the inflation objective. The MPCC consists of a performance criterion on 12-month headline CPI inflation projection for each quarter – the central target rate of inflation from IMF staff ‘inflation model’ - with an inner band set at plus/minus 2 percentage points and an outer band set at plus/minus 3 percentage points.

Text Table 5

	Jan-16	Feb-16	Mar-16	Average	Inner band (upper limit)	Outer band (upper limit)
	%	%	%	%	%	%
Headline Inflation	19.0	18.5	19.2	18.9	19.5	20.5
	Apr-16	May-16	Jun-16	Average	Inner band (upper limit)	Outer band (upper limit)
	%	%	%	%	%	%
Headline Inflation	18.7	18.9	18.4	18.7	18.0	19.0

A deviation from the inner target band would lead to a consultation with Fund staff. A deviation from the outer target band would trigger a formal consultation with the Executive Board.

The results for the first quarter show an average headline inflation rate of 18.9 per cent, well within the inner band. Turning to the second quarter - consultation is relevant for the second and fourth quarters only. The releases of estimates of headline from the Ghana Statistical Service (GSS) are 18.7 percent for April, 18.9 percent for May and 18.4 percent for June. Thus the second quarter average of 18.7 percent is higher than the upper limit of 18.0 percent for the inner band and consultations with staff of the IMF is warranted.

Fund staff's 'inflation forecast' - the central target rate of inflation in the MPCC - suggests that inflation will decline to the upper end of the BoG's inflation target band - i.e. 10 percent - by end-2016 driven by:

- The tight stance of monetary policy,
- On-going fiscal consolidation,
- Elimination of power shortages which will reduce production costs, and
- Benign foreign inflationary factors.

In the event that inflationary pressures do not recede as expected, the BoG has "indicated that it will continue to stand ready to tighten monetary policy further." (IMF Country Report No. 16/16 January 2016 para. 21 page 11). It is worth noting in this context, however, that internal and external shocks are larger and more frequent in Ghana than in developed countries. In practice, therefore, a highly activist policy could prove infeasible. Policymakers cannot be expected to combat inflation shocks with "brutal large increases in the real interest rate" (Marco et al ibid).

CEPA analysis suggests that as has been the case thus far, the problem of the apparent ineffectiveness of monetary policy to bring inflation under control, is not because monetary policy is loose in any sense, nor for that matter fiscal consolidation has been inadequate. Without the effective collaboration of the fiscal authority and the full - including the objective of **lengthening of maturities in the domestic debt market** - and effective implementation of MTDS (2015-2017), further tightening of monetary policy would not succeed in the objective of bringing down inflation. The MTDS (2015-2017) is more comprehensive in its objectives than its predecessor (IMF Country Report No. 16/16 para 38 page 16).

In accordance with Paragraph 4 of Letter of Intent dated March 20, 2015 Ghana shall consult with the Trustee (IMF) on the adoption of any measures that may be appropriate at the initiative of the government or whenever the MD of the Trustee requests such a consultation. (IMF Country Report No. 15/103 para. 8 page 41).

## 1.6 Deepening the Domestic Debt Market and the MTDS

*Deepening the domestic market will be critical to enable the Government to secure a stable source of financing without recourse to monetary financing and to implement its MTDS, thereby reducing debt and fiscal vulnerabilities (ibid. para 4 page 35).*

The credibility of the auction calendar must be reinforced through “a better synchronization with government cash management needs.” To restore credibility of the MTDS, the government will need to **implement the strategy more effectively**. To lengthen the domestic debt maturities and reduce refinancing risk, secondary market trading will be needed. Improved secondary market liquidity will minimize the risk of investor losses when selling the security for cash, and will broaden the universe of investor base willing to purchase longer-dated securities – especially the non-resident portfolio investors (ibid. para 6)

## 1.7 Conclusion

In CEPA’s view, the apparent ineffectiveness of monetary policy in its inflation objective is not because monetary policy is loose. Adequate and effective collaboration of the fiscal authority (and current manager of the domestic debt market) with the monetary authority is critically important for effectiveness of the IT framework. In CEPA’s view, this has thus far not been forthcoming. The fiscal authority appears preoccupied with securing finance for the deficit at the least possible cost. It apparently therefore views the high MPR rate as a nuisance. To be fair the fiscal authority is not alone in its stance on monetary policy which appears widely held in government circles. There is considerable support in the ranks of organized labour, academia and business that easing cost of and access to bank credit would stimulate domestic production and bring inflation down. This popular view, however, has an inadequate appreciation of the prior necessity of macroeconomic stability for private investor confidence. It also takes inadequate note of more critical factors such as foreign exchange and infrastructure such as electricity supply.

It is true that in practice, the respective weights given by central banks to stabilizing inflation and stabilizing output are likely to vary over time. It is also true that these weights are also likely to depend on the credibility of the central bank. When a central bank is trying to establish credibility, the bank is likely to put greater on stabilizing inflation than stabilizing growth. (Hammond, Gill “State of the art of inflation targeting – 2012” Bank of England Centre for Central Banking Studies Handbook – No. 29 page 5). Given the low, if any, credibility in the inflation fighting credentials of the BoG, interest rates may indeed have to be kept higher than they otherwise might have been. In the view of CEPA, however, the high and yet apparently ineffective policy rate hikes to deliver on the inflation mandate lies with the inconsistent debt management strategy of the fiscal authority in domestic debt markets.

Deepening the domestic debt market - critical to secure a stable source of financing for the budget and to comply with the conditionality of zero monetary financing from 2016 onwards - is on-going with technical assistance from the IMF but it is clearly behind schedule. Meanwhile the credibility of the MTDS (2015-2017) must be reinforced. To establish its credibility, it must be implemented more effectively. To lengthen domestic debt maturities and reduce refinancing risk, secondary market trading will be needed. Improved secondary market liquidity will minimize the risk of investor losses when selling the security for cash. It will also broaden the universe of investor base – particularly of non-resident portfolio investors – willing to purchase longer-dated securities and thus to increase portfolio capital inflows upon the raising of the MPR. For now the MTDS (2015-2017) is being implemented just as its predecessor and with same inadequate inflows of portfolio capital needed to shore up depleted international reserves and support the IT framework.

The much delayed passage into law by Parliament of the amended Bank of Ghana Act sends disconcerting signals about the commitment of the government to the elimination of the long-standing fiscal dominance of monetary policy in Ghana. Thus far the central bank appears to have held the line. But the early departure of Governor Wampah and the ‘musical chairs’ of the shuffle in its aftermath gives the worrisome impression that Ghana would not be averse to monetary financing. The external headwinds appear stronger than earlier thought. Yields on Ghana’s Eurobonds are at levels significantly above those of its peers. As noted by Bloomberg and Reuters at such levels the market is effectively closed to Ghana. In a week in June Ghana moved from a US\$1.0 billion Eurobond to a syndicated bank loan and back again to a bond issuance with “all options under consideration” as the finance minister Seth Terkper was quoted to have said.

Given the stronger than expected force of the external headwinds; the limited, if any, space for fiscal manoeuvre; and zero monetary financing in 2016; the medium-term inflation target of 8 plus/minus 2 percent and end-year 2016 projection of 10 percent may prove overly ambitious (and inconsistent with current fundamentals). On this point, however, a survey of the 27 full inflation targeters at the start of 2012 noted that the “Balassa-Samuelson effects imply that optimal inflation in emerging and developing countries should be a little higher than in industrialized countries.” In the survey **“only one country had a target above 5 percent namely Ghana with a target of 8.7 percent”** (Hammond, Gill op. cit. page 8 emphasis added). Four years later Ghana’s rate of inflation is about 18 percent with the medium-term of the central bank still set at 8 plus/minus 2 percent.

Though not in any conceivable sense recommending any of them - if anything, it is strongly against them - the latest IMF REO for SSA of April 2016 brings out several ingenious ways in which some central banks in the region have responded to the strong external headwinds in order to accommodate the fiscal authority. It must be underlined that several of the countries involved, have had and currently have relatively low (single-digit) inflation. Consequently these ingenious means of central bank response cannot be used as

necessarily appropriate to Ghana. Nonetheless they represent a pragmatic response especially if they do not lead to any appreciable increase in the rate of inflation in the countries involved

The average rate of inflation for the second quarter of 18.7 percent fell between the upper limits of the inner and outer bands in the MCC process. Consultation with IMF staff (may be even with the Board of Executive Directors) is required. Whatever case for reconsideration of the zero monetary financing of the budget from 2016 onwards, as required under a modern IT framework - is weakened not helped by the procrastination over the enactment of the Bank of Ghana law and the PFM law. Progress on bringing inflation under control is key to the sustainability of the program and continued public support of it. In CEPA's view, the fiscal authority holds that key.