1. Project Data

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Prepared by Katharina Ferl  
Reviewed by Judyth L. Twigg  
ICR Review Coordinator Eduardo Fernandez Maldonado  
Group IEGHC (Unit 2)

2. Project Objectives and Components

a. Objectives

According to the Project Appraisal Document (PAD, p. ii), the objective of the project was “to support the Government of Sindh in strengthening its training programs to improve the skills set and employability of trainees.” The objective as stated in the Financing Agreement of October 21, 2011 (p. 5) differed only in terms of stating “project implementing entity” rather than “government of Sindh.” This validation will use the objective as stated in the Financing Agreement.
Outcome targets were revised upward twice. A split rating is therefore not warranted.

b. Were the project objectives/key associated outcome targets revised during implementation? Yes

Did the Board approve the revised objectives/key associated outcome targets? Yes

Date of Board Approval
23-Dec-2014

c. Will a split evaluation be undertaken? No

d. Components

The project included three components:

**Component 1: Improving and Expanding Short-Term Training (appraisal estimate US$18.75 million, actual US$13.50 million):** This component was to finance the expansion of the existing Benazir Bhutto Shaheed Youth Development Project (BBSYDP) that had already been in place for two years and had trained 79,000 unemployed youth. Specifically, this component was to finance the contracts for delivering training to approximately 45,000 additional trainees over a two- to three-year period. Competitively selected Training Service Providers (TSPs) were to be funded through performance-based contracts to deliver trainings in industry-demanded skills in the public and private sector. Target beneficiaries included semiliterate youth between the ages of 18 and 35 years with 10 years of schooling or less, with a specific emphasis on youth from rural Sindh. According to the PAD (p. 22), trainees were to be selected using a transparent public process that was to be announced via print and internet media as specified in set guidelines. Specific efforts were to be planned to target information campaigns to youth in low-income households to raise their awareness of this opportunity. Prospective trainees were to fill out a simple registration form including information on the course(s) of interest, personal details, and family details.

The applicants were to be invited to appear for an entry test (conducted by an independent testing service, the National Testing Service (NTS)). The names of all selected trainees were to be made public on the program's webpage. Trainees who had benefitted from earlier training rounds were ineligible for a second training opportunity. This criterion for eligibility was to be checked at two levels, before the testing and a second time before placement, to ensure that only fresh applicants were to benefit from the training. The component was to finance stipends, conditional on 85% attendance, for a monthly amount of PKR 2,500 (US$29), and a mobility allowance of PKR 4,000 (US$47) if the trainee's home was more than 75 kilometers away from the training location.
Component 2: Establish Market-Driven Institutional Training Programs (appraisal estimate US$5.0 million, actual US$5.0 million): This component was to finance the piloting of a sector program to establish market-driven institutional training programs in Sindh Technical Education and Vocational Training Authority (STEVTA)-administered institutions to better meet the skill demands of employers. The program aimed to establish 70 programs responsive to labor markets. This target was based on estimated average costs for upgrading or establishing a new program and was to vary with the cost requirements submitted by training institutions. The 70 programs were expected to be implemented in at least 35 institutions and at most 70 institutions, out of the 454 STEVTA institutions in Sindh. The pilot was thus to benefit 8-15 percent of institutions in the province. The main selection criteria were to be: (i) the potential to cater to local market demand, including explicit buy-in from local employers; (ii) quality of upgrade proposal; and (iii) the poverty level of the district. This program was to disburse based upon progress as measured by four Disbursement Linked Indicators (DLIs: implementation of reforms, approved curricula and standards, renovated and equipped facilities, and enrolled students), all verified on a sample basis by an independent third party.

Component 3: Capacity Building of Sindh Technical Education and Vocational Training Authority (appraisal estimate US$1.25 million, actual US$1.60 million): This component was to finance the provision of technical assistance to strengthen STEVTA to implement Component 2, establish better information systems and policies, improve the capacity to manage its institutions, and enhance monitoring and evaluation (M&E) and dissemination of results of the programs. The M&E activities were to include tracer studies, a net impact study of training programs, and employer surveys. The component was also to finance capacity development of staff as well as strategic policy improvements in the technical and vocational education and training (TVET) system in the province, such as developing standards and assessments and undertaking strategic studies. This component was also to provide technical assistance, training, operational costs for project implementation, and limited equipment and supplies.

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

**Project Cost:** The project was estimated to cost US$26 million. Actual cost was US$18.64 million. The project experienced cost savings due to delivery of training in small rural towns as opposed to the larger cities of Sindh (during the first three years of implementation), lower than estimated costs of service delivery due to use of a competitive funding mechanism and involvement of the private sector, and the implementation of a placement algorithm to ensure that the distance between the trainee’s home and training location was reduced, all resulting in a 30 percent reduction in funds required.

**Financing:** This International Development Agency Credit was approved in the amount of US$21 million. US$18.64 million was disbursed, and $0.77 million remained undisbursed.

**Borrower Contribution:** The government was originally to contribute US$5.0 million. The project team later added that, according to the Interim Unaudited Financial Report of September 30, 2018, the
government’s contribution for Component 1 was US$2.5 million (using the May 31, 2018 exchange rate as in the ICR) and for Component 2 was US$1.25 million.

**Dates:** The project was restructured four times: i) on December 15, 2014; ii) on December 29, 2015; iii) on December 16, 2016; and iv) on December 22, 2017. The first project restructuring was to increase the target value for the number of youth who receive short term training under the project in the extension period, and to reallocate funds from the "unallocated" category to support enhanced technical assistance for training programs upgraded under Component 2. Both the 2014 and 2015 restructurings increased the outcome targets for number of youth completing short-term training, as the previous targets had been met in each case. All the restructurings extended the closing date to allow for the completion of project activities, which experienced delays due to slow transfer of funds from the Government of Sindh to the two implementing agencies.

### 3. Relevance of Objectives

**Rationale**

The government of Pakistan implemented an ambitious reform program in the mid-2000s resulting in a reduction of the fiscal and the external current account deficit and an increase of gross domestic product with reduced inflation. In 2008-2009, however, the country experienced a dramatic fallback during the most serious economic crisis in the country’s history, followed by a modest economic recovery. The country’s macroeconomic stability continued to be fragile. One of the key constraints to economic growth and competitiveness was a lack of skilled labor and human capital. According to the PAD (p. 1), at the time of appraisal only a quarter of the youth cohort graduated from secondary education, and only four percent entered the higher education system. Also, less than one percent of the population in the age range 10 years and above ever received technical education and vocational training. In addition, the quality of education was weak at all levels, dropout rates were high, and learning achievements were low and varied. The TVET sector in Sindh, one of the four provinces in Pakistan, faced a number of challenges including poor relevance of training, few training opportunities, and low public investment. Also, the infrastructure of public institutions was outdated, and the administration of public institutions was generally poor and had few quality assurance mechanisms, occupational standards, or certifications in place.

The project supported the government’s BBSYDP that had been initiated to skill unemployed youth for employment. The program financed training through contracts with private and public training providers. According to the ICR (p. 17), the project also supported the National Vocational and Technical Training Commission’s National Skill Strategy (2009-1013), which aimed to improve trainings through the delivery of competency-based trainings. At the time of appraisal, the project’s objective was in line with the Bank’s Country Partnership Strategy (FY10-13), which included a pillar to improve human development and social protection. The project supported several pillars of the Bank’s Country Partnership Strategy (FY15-20) at closing, including pillar 2 on “private sector development,” in particular its outcome area “improving
youth skills for business,” and pillar 3 on “inclusion” by including female and poor beneficiaries in skills training programs.

Rating
High

4. Achievement of Objectives (Efficacy)

Objective 1

Objective
To support the implementing entity in strengthening its training programs to improve the skills set of trainees and employability of trainees

Rationale
The project’s theory of changed linked the provision of market-driven short-term training, equitable access to such training, and upgrading competitively selected trades and capacity building for teachers and institutes with improved skills and employability, which ultimately would result in increased competitiveness of local companies and economic growth for the country.

Outputs

Outputs under Component 1:

- TSPs were selected competitively and funded through performance-based contracts to deliver trainings in industry-demanded skills in the public and private sector. 1,437 private sector TSPs participated in the project, offering skills training on 354 types of trades. To promote participation of youth who otherwise would not have had access to training, the project supported stipends conditional on 85 percent attendance for a monthly amount of PKR 2,500 (US$29). If a participant lived further away than 75 kilometers, they were eligible for a rural mobility allowance of PKR 4,000 (US$47). In order to include women, the program offered trades at locations close to the beneficiaries’ homes (also in rural areas) and trades that were likely to attract more females, including agro-horticultural trades, arts and crafts, health and medical services, office management, beautician, textile, garment, and embroidery and tailoring.

Outputs under Component 2:

- 70 programs (from 47 STEVTA institutes) offered labor market-driven training programs monitored by four DLIs: (a) refurbished faculties, (b) updated curricula with curriculum-compliant equipment, (c) placement of teachers and faculty trainings according to the updated curricula, and (d) enrollment with at least 80
percent of the seating capacity. The curriculum and training facilities were updated in each of these programs, achieving the target. For 66, curriculum-compliant equipment was procured and installed, not quite reaching the target of 70. Through the support of Institutional Management Committees (IMCs) in all 70 programs, 58 enrolled their first classes at 80% of capacity, not achieving the target of 70. 378 girls were enrolled in these programs, representing 27% of all participants.

- The number of training programs in institutions having an active IMC with at least a third of the members from the private sector increased from 10 in 2011 to 70 in 2018, achieving the target of 70 training programs.
- 17 STEVTA board meetings were held publicly, surpassing the target of four meetings.
- In 2018, the project carried out a tracer study of STEVTA institutes delivering market-driven training programs.

### Outcomes

1. 106,209 unemployed youth participated in project-sponsored training programs under five rounds of BBSYDP, and 83,639 of those graduated with support from stipends under the project, surpassing the original target of 45,000 youth and the revised target of 82,000 youth.
2. The share of female participants in youth development programs increased from 20% in 2011 to 53% in 2018, surpassing the target of 28%. The share of rural participants in youth development programs decreased from 70% in 2011 to 69% in 2018, almost achieving the target of staying constant at 70%.
3. The BBSYDP had trained 79,000 unemployed youth using government resources before the project started, and a government-funded training program continued during the project period in parallel with project activities.
4. The percentage of trainees of the BBSYDP who were externally certified increased from 20% in 2011 to 75.1% in 2018, surpassing the target of 30%.
5. Information provided by the project team in response to the draft of this ICR Review indicates that the employment rate of BBYSDP trainees increased from 28% percent in 2010 to 40.8% in 2018. The project established a baseline through a tracer study of BBYSPD’s trainees in 2010 whereas the end line was collected through third party validation exercises. In comments, the project team stated that the end line reported represents the average employment rate for trainees of the five BBSYDP training rounds sponsored by the project. The employment rate associated with the BBYSDP sponsored by the project is higher than the employment rate for similar short-term training programs in Bangladesh, India, and Pakistan (also provided in the team’s response).
6. The third-party validation for the fifth round also showed that the BBSYDP supported by the project performed better than similar Government of Sindh programs. Comparison showed The ICR reported that 96% of the BBSYDP training service providers (TSPs) delivered the curriculum as agreed in program guidelines, compared with 31% of TSPs in similar Government of Sindh programs; 76% of BBSYDP trainees achieved certification by external bodies, compared with 3% for Government of Sindh program trainees; and 92% of BBSYDP trainees received employment facilitation compared with 17% for Government of Sindh program trainees. (Information on achievements of Government of Sindh programs was provided in the GP’s response to the draft ICR Review.)
7. 57% of all graduates of the 70 new labor market-driven programs at STEVTA institutes interviewed in a 2018 tracer study had found some form of employment (full-time household work, full-time formal
employment, part-time employment, or self-employment). According to the ICR (p. 40), this is a higher than the average placement rate in the context of government-run training institutes.

- A 2018 third-party validation report covered visits to 35 STEVTA institutes and 51 STEVTA programs in five regions of Sindh. It found that 30 of the 35 institutes visited achieved all four DLIs. It also found that 86% of graduates felt that the STEVTA curriculum was up to date, and 65% felt that the courses had a high level of relevance in today's job market. Most employed graduates said they had to resort to using informal modes of placement support, with only 3% finding a job using their school/institute. Only 5% of all the employed graduates were self-employed, indicating a possible lack of support for entrepreneurs (evident from the fact that only 4% borrowed initial funding from banks or microcredit institutes). 47% of all respondents felt that STEVTA offered little to no soft skills training.

Rationale

Overall, the project met its target with respect to the number of unemployed youths who graduated from the BBYSDP program. The information provided (in the ICR and later) indicates that the BDYSP program increased graduates’ employment rates over time and that it performed better than other similar short-term training programs in South Asia. Though with minor shortcomings, the project also met its targets with respect to developing longer term market-driven programs in STEVTA institutes. Given these achievements, overall efficacy is rated substantial.

Overall Efficacy Rating
Substantial

5. Efficiency

Economic Efficiency

The PAD (p. 12) and the ICR (p. 14) conducted a benefit-cost analysis based on the two main components of the project. The PAD identified the project's benefits as an increase in the probability of trainees finding employment and an increase in their salaries after they have received training. For Component 1, the net present value (NPV) of investing in short-term training of 45,000 youth at an average cost of $410/trainee was estimated at US$27.34 million, with an internal rate of return (IRR) of 21% for the base case if the probability of finding employment three months after completing training remained at 28% (BBSYDP Tracer Study).
Finding for FY2010). If the probability of employment were to increase to 40% as targeted by the project, the NPV was as high as US$73.9 million, with an IRR of 36.7%. For Component 2, a sensitivity analysis was conducted for cost-benefit calculations, where the probability of employment within six months was varied under low and high scenarios. Based on the analysis, re-designed one-year programs had an IRR of 26.9% and a per-trainee NPV of US$1,703 under the low case scenario, with an increase in the IRR to 34.4% and the per-trainee NPV to US$2,560 under the high case, indicating a strong economic rationale for project implementation.

The ICR used the same assumptions as the PAD, with a discount rate of 12% and a wage premium of 6.4% for skilled and 5.6% for unskilled labor. Life time earnings of an individual were assumed to be over a 40-year time span. For Component 1, the ICR found an IRR of 91% and a NPV of US$537 million. Both estimates were higher than at appraisal due to a higher number of project beneficiaries and higher probability of employment. For Component 2, the ICR found an IRR of 27-34% and a per-trainee NPV of US$ 5,866 - 8,088 under the low and high scenarios.

**Operational Efficiency**

The BBSYDP implemented a placement algorithm to ensure that the distance between the trainee’s home and training location was reduced. This resulted in a 30% reduction in funds required for training. However, there were moderate implementation shortcomings. Due to intermittent and inadequate release of funds to the implementing agency from the Government of Sindh, the project’s closing date had to be extended four times resulting in a total extension of 41 months. Also, according to the ICR (p. 20), the agreed 80–20 counterpart financing ratio was not fully maintained during implementation because counterpart financing was not available on time. During the last month of project implementation, the project lacked counterpart funding and the project could not disburse. In addition, ineligible expenditure was declared in September 2017 based on a government audit and an additional detailed financial management audit that identified failure to follow operational procedures for distributing stipends to beneficiaries. Due to these financing and fiduciary issues, the project could not be scaled up further. These shortcomings are indicative of inefficient use of project resources. The project’s overall efficiency rating is therefore Modest.

**Efficiency Rating**

Modest

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

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<th>*Coverage/Scope (%)</th>
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ICR Estimate

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* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

Relevance of objectives was High given the project’s alignment with country context, government strategy, and the Bank’s most recent Country Partnership Strategy. Efficacy is rated Substantial. Efficiency is rated Modest due to several shortcomings in implementation efficiency. The overall outcome rating is therefore Moderately Satisfactory.

a. Outcome Rating
   Moderately Satisfactory

7. Risk to Development Outcome

Some of the capacity development that took place under the project is likely to be sustained. STEVTA was able to (re)design and operationalize existing or new training programs in selected reformed training institutions, strengthen its governance structure, and improve its institutional capacity by establishing better information systems and policies. In addition, active IMCs were enhanced by at least a third of their members from the private sector, ensuring a more dynamic market-driven training program. According to the ICR (p. 22), however, Pakistan’s weak economic outlook and decreasing competitiveness may undermine the relevance, quality, and effectiveness of trainings due to weak labor market absorption and tight budget constraints for spending on human development. The IMCs have been allocating funds for teachers to be placed in the 70 new training programs, but these funds are tenuous as they are based on grants from STEVTA, the private sector, and revenue-sharing with the programs themselves. In the longer term, teachers will have to be formally hired by the government, challenging in an already fiscally constrained environment.

8. Assessment of Bank Performance

a. Quality-at-Entry

According to the ICR (p. 21), project design reflected experience from the implementation of earlier TVET projects and took lessons learned from completed trainings by the BBSYDP into account. These earlier programs were reviewed in terms of participation, gender, trade specialization, job placement rate, quality of training facilities, training quality, training mechanisms, management information system, etc., through a
tracer study (PAD, p. 68). Public-private competitive selection, preference for quality-focused training, emphasis on job placement, and emphasis on in-demand specializations were among the areas where earlier lessons were considered.

The project was in line with the government’s federal and provincial agenda. Furthermore, the project used existing institutional structures of the BBSYDP and STEVTA for project implementation. The Bank team identified relevant risk factors. The following risks were rated as medium: i) reduction in government ownership due to change in political leadership; ii) insufficient staffing and lack of long-term education goals in the implementing agency; iii) unfamiliarity with competitive selection processes and results-based contracts for public sector institutions and the competitive fund mechanism proposed under Component 2; and iv) reduced demand for skilled labor as a consequence of low economic growth. The Bank’s mitigation measures for these identified risks were adequate. The ICR (p. 17) stated that the implementing agency was set up with adequate staff and monitoring and reporting systems to allow for timely start of project implementation.

However, the ICR (p. 22) stated that the project’s allocation of only 20% of project fund to the RBF-financed Component 2 was insufficient given unfamiliarity with the financing mechanism, resulting in continuous delays.

Quality-at-Entry Rating
Moderately Satisfactory

b. Quality of supervision

According to the ICR (p. 21), the Bank conducted regular supervision missions and site visits. Findings and challenges were reported to the government and to Bank management. The ICR further stated that Implementation Status Reports were generally of good quality. The Bank team also raised shortcomings in fiduciary procedures for electronic payment of stipends, and ineligible expenditures were returned by the government. Even though the frequency of supervision missions was increased to address implementation bottlenecks due to delayed counterpart financing during the last two years of project implementation, the Bank was not able to solve these issues, and the project’s closing date had to be extended four times. Furthermore, the project experienced shortcomings with respect to M&E implementation (See Section 9a).

Quality of Supervision Rating
Moderately Satisfactory

Overall Bank Performance Rating
Moderately Satisfactory
9. M&E Design, Implementation, & Utilization

a. M&E Design

The objective of the project was clearly specified. The theory of change was sound and reflected appropriately in the results framework. The intermediate results indicators were adequate to measure the contribution of project activities towards achieving the project’s objective.

Baselines and targets were specified where appropriate. The M&E design included a set of four DLIs measuring “implementation of governance reform,” “development of market driven curriculum,” “adequately equipping reformed programs,” and “commencement of training.”

The project focused on strengthening and supplementing the existing M&E systems used by SVEVTA and BBSYDP. The ICR (p. 18) stated that several key staff were hired to manage data collection and monitor and report results.

b. M&E Implementation

According to the ICR (p. 18), data on key indicators were produced on a regular and timely basis. Target values for the number of persons trained were increased at both the 2014 and 2015 restructurings to take into account achievement of previous targets. Third-party validations were conducted for STEVTA and the BBSYDP. The BBSYDP developed a web-based management information system to collect data from these validations. Selected training institutions were required to submit detailed inception reports including information on their trainees, course content, and activity plans. All training institutions submitted reports on progress of activities on a weekly basis and consolidated reports on a monthly basis to the BBSYDP. All private sector training institutions were visited at least once a month by a BBSYDP program officer or district program coordinators. A course completion report was submitted by the training institutions to report on the completion rate of trainees. The ICR (p. 19) stated that BBSYDP did not conduct an independent tracer study to better understand the successes and challenges in increasing employability but instead relied on third-party validation reports on employment outcomes. Also, the PAD (p. 47), in the M&E section, noted that the project would carry out a net impact study within the duration of the project, which would have compared BBSYDP participants with non-participants. The ICR did not report results of this study, and did not state whether this study was conducted. The project team’s comments on the ICR Review draft indicated that, in lieu of the impact study, the project measured employment outcomes through third party validations exercises. These third-party validations, however, did not include information that would enable comparison of experiences of project participants with experiences of other similar people who did not participate in the project. The project team later provided additional information comparing the performance of the BBSYDP program with similar South Asia programs and Government of Sindh programs. The ICR (p. 19) mentioned that the intermediate results indicator “stakeholder ratings of STEVTA” was not tracked; this would have been a critical indicator for measuring TVET outcomes on the labor market, including employer satisfaction with STEVTA sponsored training programs. Overall, however, these are considered moderate shortcomings.
c. M&E Utilization

The ICR (p. 19) stated that M&E and third-party validation data were used to track progress and identify implementation bottlenecks, allowing for highlighting of issues in a timely manner and using M&E data to inform decision making. Tracer and monitoring studies were conducted on an annual basis. Furthermore, M&E data informed the performance evaluation and ranking of TSPs under Component 1. Weak performing TSPs were informed and given the opportunity to improve. In addition, the Bank team stated (March 21, 2019) that the Bank's fiduciary audit helped addressing the ineligible expenditure issue.

M&E Quality Rating
Substantial

10. Other Issues

a. Safeguards

The project was classified as category C and did not trigger any of the Bank's safeguard policies.

b. Fiduciary Compliance

Procurement:

According to the Bank team, procurement was carried out in accordance with Bank guidelines. The project did not encounter any specific procurement-related delays.

Financial Management:

The project's closing date had to be extended four times due to intermittent and inadequate release of funds to the implementing agency from the Government of Sindh. As mentioned in Section 8a, the project's allocation of only 20% of project fund to the DLI-financed Component 2 was insufficient given unfamiliarity with the financing mechanism, resulting in continuous delays.

According to the ICR (p. 20), in 2017 a government audit and an additional detailed financial management audit found ineligible expenditure due to failure to follow operational procedures for distributing stipends to beneficiaries. The amount was refunded with a value date of May 2018. Furthermore, the agreed 80-20
counterpart financing ratio was not fulfilled as counterpart financing was not available on time, an issue that persisted until project closing and resulted in inability of the project to disburse. Due to these challenges, the financial management rating for the BBSYDP was Moderately Unsatisfactory when the project closed.

According to the Bank team, all audit reports entered in the Bank system appear unmodified. Two audit reports (for FY 2013 and FY 2014) were received after the due date.

c. Unintended impacts (Positive or Negative)

According to the ICR (p. 16), the competency-based testing and assessment programs developed by STEVTA were accredited by the National Vocational and Technical Training Commission as the national standard, benefiting other provinces in the country.

d. Other

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<table>
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<td>Outcome</td>
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<td>Quality of ICR</td>
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<th>12. Lessons</th>
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| The ICR (p. 22-23) provided several lessons learned, adapted here by IEG:  
  • **When implementing a new mechanism such as Results-Based Financing, it is critical to allocate sufficient resources for its implementation.** In this project, only 20 percent of the project funds were allocated to Results-Based Financing despite a lack of experience in working with such a mechanism, resulting in implementation delays due to administrative delays in the allocation of funds and release of funds from the line department to the implementing agencies. |
• Supporting a training scheme that has already been established in the country is beneficial for ensuring country ownership, taking lessons learned into account and building on already existing experience. In Pakistan, the BBSYDP had already been implemented for two years, allowing the project design to consider lessons learned and to build on an already existing training structure.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR was concise and internally consistent, generally following guidelines. It provided an adequate economic analysis. It presented evidence and provided a candid account of implementation challenges and attempts to resolve them. However, some gaps are noted: First, although relevant information that compared the performance of the project-sponsored short-term training (BBSYDP) with other programs existed (it was provided to IEG in response to the draft ICR Review), the ICR omitted to mention it, even though this information would have greatly strengthened the results narrative by providing comparison information that would have helped to make a case for plausible relationships between the project activities and results observed (by comparing results observed among project participants with results observed among other populations for example). Second, the ICR did not include comprehensive information in critical areas such as procurement and financial management. Third, the ICR did not discuss whether the Bank team identified relevant risks and implemented adequate mitigation measures. Finally, the ICR did not include information on the achievement of DLIs.

a. Quality of ICR Rating
   Modest