1. Project Data

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<th>Project ID</th>
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Prepared by Dale M. Hill
Reviewed by Judyth L. Twigg
ICR Review Coordinator Joy Behrens
Group IEGHC (Unit 2)

2. Project Objectives and Components

a. Objectives

The original Project Development Objective (PDO) was to enhance the operation and management of a nationwide, effective and transparent safety net (SN) system for the poor within the territory of the Recipient (Financing Agreement, dated July 3, 2009, Schedule 1).

The revised PDO was to support the expansion and strengthen the administration and performance of the country’s safety net with particular focus on the Benazir Income Support Program (BISP) as the national safety net platform. (Financing Agreement for Additional Financing, dated March 12, 2012, Schedule 1).

The PDO and some outcome targets were revised at a Level 1 Restructuring, March 26, 2012, and a split...
rating will be performed. At that point, 27.8% of Bank financing had been disbursed (ICR, p. viii).

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
26-Mar-2012

c. Will a split evaluation be undertaken?
Yes

d. Components

The original project was a technical assistance (TA) project, taken to the Board within two months of a complementary Development Policy Credit (DPC). The Government of Pakistan (GoP) counterpart funds were to finance most unconditional cash transfers (UCTs) to beneficiaries, with the DPC providing additional budget support, while focusing policy changes on: (i) improving BISP’s targeting efficiency; (ii) setting up an institutional framework for cash transfer implementation; and (iii) enhancing fiscal sustainability and the fiduciary environment for the BISP.

Additional Financing (AF) (approved by the Board March 26, 2012) comprised: USD 50 million transferred from the second tranche of the DPC (not released for macroeconomic reasons), USD 100 million in new International Development Association (IDA) financing, and a potential USD 59 million from the United Kingdom’s Department for International Development (DfID) -- a trust fund (TF) administered by the Bank. The Board’s approval of the AF was part of a Level 1 restructuring that also changed the project's title, results framework (RF), and closing date. Some subcomponents were also slightly revised, and new subcomponents added, as described below.

Part 1: Establishment of a National Targeting System (appraised at USD 34.6 million, with added USD 31.5 million IDA financing and potential USD 59 million DfID cofinancing, or a total appraised value of USD 125.1 million; actual USD 152.5 million). This component was to establish a national targeting system to identify SN beneficiaries through: a) finalizing an ongoing poverty score card (PSC) targeting process using the National Socio-Economic Registry (NSER) (piloting having begun in March 2009 supported by a prior DfID TF; b) expanding an ongoing national targeting survey begun in 2011; c) developing processes and systems for handling appeals; and d) maintaining an updated database. After restructuring, this component's name was changed to "Establishment of a National Targeting System and Expanding Coverage of the Basic SN Systems," and a second subcomponent was added to provide the UCTs to about six million beneficiaries selected through the PSC mechanism previously tested, with tranches released in response to disbursement linked indicators (DLIs).

Part 2: Strengthening SN Operations (appraised at: USD 12.9 million, with added USD 97.5 million IDA
financing and potential USD 37 million DFID cofinancing, or a total appraised value of USD 147.4 million; actual USD 62.88 million) The original components supported BISP operation of an SN program at central, regional, and local levels through: a) a public communication strategy for potential beneficiaries plus training of officials of BISP, partner organizations, and data processing agencies; b) improving the SN beneficiary selection and enrollment process through application of a proxy means test; c) strengthening payment and reconciliation mechanisms; d) establishing field offices; e) implementing grievance redressal, monitoring, and supervision mechanisms; and f) establishing other social accountability mechanisms. After restructuring, this component added conditional cash transfers (CCTs) under the Waseela-e-Taleem (WeT) program, also administered by BISP, which promoted primary education among BISP beneficiaries with children of eligible age. Complementary adjustments included more institution building for BISP and its partners, expansion of the public communication campaign, updating grievance mechanisms, strengthening management information systems (MISs) and monitoring and access protocols, and adding social mobilization activities for female WeT beneficiaries.

Part 3: Enhancing the Management, Accountability and Evaluation of an SN Program (appraised at: USD 14.22 million, with added USD 21 million IDA financing and potential USD 9 million DFID cofinancing, or a total appraised value of USD 40.8 million; actual USD 22.27 million). This component's original activities included: a) designing and operating an SN MIS at national, regional, and district levels, including for the public domain; b) providing TA and training to BISP's staff and stakeholders on coordination, monitoring and evaluation (M&E), and control mechanisms; c) designing, implementing, and supervising pilot programs for developing "graduation strategies" and human development service links); d) developing process and impact evaluations, including beneficiary assessments; e) carrying out operational inspections, e.g. audits and spot-checks; and f) providing training on SN programs to auditors. After restructuring, the MIS system design was extended also to the tehsil level.

Part 4: Developing the Social Protection Policy (appraised at USD 1.7million; actual USD 0.38 million). This component sought to design an institutional and legal framework for executing the National Social Protection Strategy (NSPS) through TA for: a) definition of institutional roles of entities involved in the NSPS; b) designing and building a streamlined M&E system for the NSPS and related SN programs; and c) building capacity among key stakeholders on SN issues. Restructuring added no more funds, but more emphasis to development of SN policy, not only strategy.

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

Project Cost. For the original project, total cost was estimated at USD 60 million. An AF of USD 255 million (USD 150 million from IDA [USD 100 million new and USD 50 million redirected from cancellation of the second tranche of the DPC, and potential DFID cofinancing of USD 105 million] was approved at restructuring, as noted. The Restructuring Paper lists revised total costs as USD 2255 million, implying GoP counterpart funding of USD 2 billion. The ICR's Annex 1 covered only IDA actual costs (USD 139.94 million) and did not provide GoP or DFID actual costs. The difference from the planned IDA financing was due to exchange rate fluctuations; in fact, the entire AF amount in SDRs was consumed. Actual expenditures significantly deviated from the appraisal estimates (after AF) for the first and second components. The ICR (p. 28) noted but did not fully explain these differences.
Financing: As noted above, initial financing was through a USD 60 million IDA Credit, with an additional USD 205 million AF was approved, a combination of transferred and new IDA funds and DfID TF funding. As mentioned above, GoP was to provide USD 2 billion. The ICR (p. vii) gave the actual disbursement for the project as USD 190.4 million. However, there were changes in the SDR/USD rate, and in SDR terms, all funds were used. The ICR’s Annex 1 did not provide information on actual GoP funding (against the expected USD 2 billion); but page 10 stated that GoP contributed USD 4 billion over the life of the project. The ICR did not explain the discrepancy between the planned GoP contribution of USD 2 billion and actual of USD $4 billion.

Borrower Contribution: In the original project, GoP was to contribute funds for all cash transfers plus essential staff at national and sub-national levels. Actual GoP financing was USD 4 billion against a planned USD 2 billion.

Dates: The project was approved on June 18, 2009 and became effective on August 4, 2009. The AF was approved on March 26, 2012, accompanied by a Level 1 restructuring that changed the instrument of the credit from TA to an investment operation, the title, PDO, and RF, and the closing date, which was extended from July 31, 2013 to June 30, 2016. The restructuring also amended allocations of financing among components and used DLIs to release disbursement of a large portion of the program expenditures (cash transfers).

A Level 2 restructuring on January 9, 2013 corrected discrepancies in the project documents. A mid-term review was undertaken on October 20, 2014. At a third restructuring on May 8, 2015, some results indicators changed. At a fourth restructuring on February 9, 2016, the closing date was extended six months to December 31, 2016, and at a fifth restructuring on November 14, 2016, the closing date was again extended six months to June 30, 2017 (the project's final closing date). The purpose of these last two extensions (the latter of which required Board approval) was: a) updating the NSER; b) institutionalizing parts of implementation of the WeT education program; and c) finalizing impact evaluations.

3. Relevance of Objectives & Design

a. Relevance of Objectives

The relevance of the original PDO is rated Substantial, as the goal of supporting Pakistan’s SSN system is fully in line with the current (at closing) Country Partnership Strategy (CPS) for 2015–2019. The PDO were aligned with the achievement of the CPS’s Outcome 3.2: Reduced Vulnerability for Groups at Risk, by supporting: a) improved socioeconomic databases; b) targeted, more efficient and accountable programs to increase income for the poor and vulnerable; c) piloting and expanding coverage of CCTs to promote improved attendance rates for primary education; and d) leveraging other donor financing for the same objectives. A rating of High on the relevance of the original objectives might have been appropriate if the PDO had it been stated in terms of desirable beneficiary outcomes (e.g., livelihood opportunities, health
status, educational achievements, etc.) rather than outputs and intermediate outcomes related to the delivery channels -- e.g. existing government SSN programs. The impact evaluations funded by the project provided the needed data and analysis on outcomes that would have made possible an RF supporting a more outcomes-focused PDO.

At restructuring, some of the changes to the PDO’s wording did not substantially change the above relevance rating: removal of the words "effectiveness" and "transparency" and addition instead of "strengthening of administration and performance" of the SSN system, and specific reference to BISP as the agency applying the poverty scorecard as envisaged in the original TA and DPC credits. However, with the addition of "expansion of the program" to the PDO, appropriate given the AF, the relevance increased to High, as the AF addressed a need created by GoP’s constrained finances and macroeconomic risks. IDA’s involvement leveraged additional donor funds which, together with IDA’s, were able to fill a potential gap in coverage.

### Rating
- Substantial

### Revised Rating
- High

#### b. Relevance of Design

The design of the original TA credit and the parallel DPC were interdependent, even though the TA financed advisory services, studies, staff support, and some facilities, and the DPC provided budgetary support, following achievement of certain milestones. The described components of the TA credit and "policy objectives" of the DPC are similar (given above in Section 2d).

Given the PDO, very much focused on improving the effectiveness of a single government program, the relevance of design is rated High before and after the AF. The choice of components followed logically from the PDO, with support for: a) improvement of an overarching safety net strategy (Component 4); b) the rollout of a national improved targeting system based on the test phase started in March 2009, using improved methodologies (PSC) and data (NSER) (Component 1); c) support of key components necessary for successful implementation of the rollout, such as public information campaigns, beneficiary selection mechanisms, grievance procedures, establishment of field offices, and training of local staff in social accountability mechanisms (Component 2); and d) other institution-building mechanisms necessary for smooth implementation, coordination, transparency, and continuous learning, namely building an MIS that would link national and lower levels, as well as strengthened M&E systems (Component 3).

The revised design after the AF, increased the probability of achieving the PDOs efficiently (through use of DLIs), added additional services to support "graduation strategies" for beneficiaries, and provided additional TA to build on pilots and learning during the first phase.

### Rating

### Revised Rating
4. Achievement of Objectives (Efficacy)

**Objective 1**

**Objective**

Original objective: Enhance the operation and management of a nationwide, EFFECTIVE safety net system for the poor within the territory of the Recipient

**Rationale**

The BISP objectives were "to offer predictable and timely income support to smooth consumption and promote human development outcomes" (PAD, para 26).

**Outputs**

*Establishment of a national targeting system* (mostly attributable to the project, but the targeting design was based on work on the PSC methodology piloted earlier under the DfID TF administered by the WB). Outputs included: a) the Poverty Survey of 2010/11, which involved scientific methods and a door-to-door census to establish the NSER, a database of about 27 million households that is the basis for the BISP targeting system; b) rollout of the national targeting system using a PSC, based on experience from the test phase launched in March 2009; and c) the maintenance of the database. The adoption of a PSC for BISP targeting in 2009 had been a prior action required under the previous Pakistan Poverty Reduction and Economic Support Operation.

This project accomplished the operationalization of the targeting system across all regions, as shown by achievements against April 2009 baseline and project targets: a) the PSC was applied to 27.46 million people, far exceeding the target of 10 million; b) 75% of disbursed BISP cash transfers were received by beneficiaries in quintiles 1 and 2, against a baseline of 46% and target of 70%; and c) 99.4% of districts were covered by targeting, against a baseline of 5% and target of 70%.

*Strengthening SN Operations (beyond the targeting process)* (all attributable to the project). Outputs included: a) a public communications strategy to maximize participation and promote understanding of the eligibility and payment system; b) strengthening of the beneficiary selection, program enrollment, and payment processes, including piloting and eventual rollout of technology-based payment systems; c) establishment of a responsive appeals/grievance process, with a monitoring system; and d) establishment of BISP field offices with social accountability mechanisms at the local level, including hotlines. The project met or exceeded most results indicator targets by project closing, and also met the criteria for DLIs, some of which are cited here: a) 72% of grievance redressal claims were settled within three months of application against the target of 50%; b) 97% of payments to BISP beneficiaries were made through technology-based mechanisms (smart card, debit card, and/or phone-based payment instruments), against a target of 70%; and c) 70% of grievances and appeals were resolved through technology-based systems.
**Introduction of co-responsibilities for BISP beneficiary families with primary school-age children** (all attributable to the project). The original project had included pilots for a CCT program promoting primary education, based on a Child Support Program run through an agency other than BISP. The AF and special interest of DfID allowed further evaluation of the pilot and expansion of the program, reaching three million BISP beneficiaries by project closing. Both the DLIs and the RF indicators related to the WeT program were fully achieved or exceeded, some of which are cited here: a) a BISP stratified communication campaign for WeT was rolled out in 32 districts (the number of districts was supplied by the task team); b) six provinces signed Memoranda of Understanding to collaborate with WeT; c) a technology-based grievance system for CCTs was applied in at least four districts; d) BISP designed and initiated a pilot social mobilization plan for potential beneficiaries of WeT; and e) an internal evaluation of WeT was undertaken toward project end.

**Enhancement of SSN program management, accountability, and evaluation** (mostly attributable to the project, including pilot programs for exit strategies, which donor parallel financing built on later): a) establishment of an integrated MIS with associated staffing, training, and hardware; b) pilot interventions to help BISP beneficiaries "exit" or "graduate" from dependency on the program (including the WeT program), training for youth, and catastrophic health insurance programs for BISP beneficiaries (the task team supplemented limited ICR information on the latter two); c) tools for controls, audits, and spot checks; d) various internal M&E activities (listed in ICR, p. 30); and e) a process evaluation and impact evaluations, the latter launched by Pakistan’s President, with all reports posted on the BISP website. All quantitative targets were met, some of which are listed here: a) eight regular spot checks and follow-up actions on pilot activities’ findings were achieved, against a target of one; and b) 38 reports were published on BISP's website to disseminate the results of impact, process, and spot check evaluations, against a target of 12.

**Satisfaction with the Program** (attributable to the project): 97% of BISP beneficiaries were satisfied with program implementation, against a target of 80%.

**National Social Protection Policy Framework (NSPPF)** (insufficient information to assess attribution, as it is possible some work on the NSPPF preceded the project, and some was due to the DPC.) Development of this policy framework (responsibility of the National Planning Commission) involved: a) analysis of legal and institutional frameworks; b) mapping of all social protection programs; c) a participatory consultation with regional and provincial offices; and d) development of an M&E system that includes evaluation of selected social protection programs to inform policy-making. Progress on these activities was slower than on others, but the NSPPF has now been approved by the Federal Technical Advisory committee, which includes representatives from non-governmental organizations. Training in social protection policy and SN program implementation was provided for policy makers and staff, including those of the Office of the Independent Auditor.

**Some planned outputs were only partially achieved.** The integrated monitoring system for federal and provincial social protection programs was established, but there is no evidence that it has been used for policy dialogue. Policy dialogue on social protection has been complicated by the passage of the 18th amendment to the Constitution, which gave authority for some social programs to the provinces. Planned staff positions were only 74% filled at headquarters and 52% at the divisional level. Development of the WeT monitoring plan to "shadow activities of implementing partner firms" is in progress, but not complete, and according to the Government’s ICR, "work in critical areas such as the NSER, WeT, MIS strengthening, and..."
complementary initiatives is still in progress" (ICR, page 49).

**Outcomes**

**Effects on Poverty Indicators:** Results were reported from a 2016 impact evaluation. The ICR did not provide detail on the evaluation methodology, although the task team stated that it was rigorous, with control groups. The results reported in the ICR, with one exception, did not state results in terms of statistical significance. Furthermore, adjustment of the country's poverty line in 2016 made some impact analysis problematic. The one exceptional mention of statistical significance in the ICR (p. 21) reported no evidence that the impact of BISP on the poverty rate was statistically significant. At the same time, the ICR's references to this conclusion were inconsistent: Annex 2 refers to the BISP UCTs as "estimated to have contributed to reducing poverty among beneficiaries by 7 percentage points, relative to non-beneficiaries having similar characteristics," implying a methodology of comparison of impacts with and without assistance; however, the earlier reference (p. 21) stated that the difference of 7 percentage points depended on which poverty line methodology was chosen.

Other tentative effects of BISP on beneficiary welfare noted in the ICR (using imprecise language), though credible, may or may not be statistically significant (and may or may not be attributable to the BISP): a) increased per-adult equivalent monthly level of consumption expenditure by Pakistani Rupee (PKR) 187, and increased per-adult equivalent monthly food consumption of PKR 69, driven by high quality protein (the ICR gave no perspective on the relative scale of change); b) decrease in the proportion of girls, but not boys, who were wasted, in nutritional terms; c) improvements in the quality of flooring and cooking fuel used; d) increased female status/empowerment with regard to mobility, voting, and tolerance of domestic violence; e) increased ownership of livestock; and f) increased household savings.

More ambiguous indicators (or leading indicators) of changed welfare cited in the ICR included: a) increased frequency of males saying they should help with household work; b) decreased proportion of men engaged in casual labor for income; c) increased proportion of men engaged in agricultural activity; d) decreased unpaid female labor; and e) "although only 1/3 of the women picked up transfers themselves, ¾ stated they retained control of the use of the cash" (timeframe unclear, ICR, p. 19).

**Effects on primary school attendance:** While in education projects, attendance may be considered an output (relative to learning outcomes), in this project, attendance is a changed behavior incentivized by CCTs for BISP beneficiaries. The ICR gave inconsistent figures and provided no baseline to allow determination of attribution. 1.3 million children were reported to have been WeT program beneficiaries who "ever attended and received payment for attending a school," against a target of 0.5 million, but according to a DLI reported as achieved, "3 million children of existing BISP beneficiary families are attending school, are monitored, and paid in accordance with their co-responsibility." In any case, an evaluation of WeT revealed that the program (which began with this project) has had a positive and significant impact of 9% on the proportion of both male and female children enrolled in primary school. The results of a cost-benefit analysis conducted for the World Bank follow-on project, **National Social Protection Program-for-Results (NSPPR, P158643), approved in March 2017** suggested that the schooling benefits expected from the scale-up of WeT will yield high returns, with an internal rate of return (IRR) ranging from 19 percent to 22 percent.
Objective 2

Objective

Original objective: Enhance the operation and management of a nationwide, TRANSPARENT safety net system for the poor within the territory of the Recipient

Rationale

Outputs

Public information campaigns for the BISP (directly attributable to the project) were aimed at helping the public understand the program, including choice of survey districts and application of the PSC method to determine eligibility. A separate communications campaign was also rolled out for the WeT CCT education promotion program in 32 districts. The DLI target that "50% of BISP beneficiaries understand the basic program design (both cash transfer and the WeT program)" was met.

Public posting of information (directly attributable to project): a) 100% of participating tehsils were posting beneficiary lists, exceeding the target of 80%; b) reports on BISP operation and results were posted on the BISP website, including process evaluation, impact evaluation, and spot-checks: 38 reports were posted at project closing, exceeding the target of one.

Other information sharing (directly attributable to the project): a) BISP publicized the PSC data sharing protocol, including sharing it with at least two entities (meeting a DLI); b) an integrated monitoring system for the federal and provincial social protection programs was established, "including for the public domain."

Establishment of grievance and appeals systems: The achievement of RF indicators and/or DLIs related to this area, cited above under Objective 1, would also potentially contribute to this objective of promoting transparency. The achievement of 97% of payments made through technology-based mechanisms at least contributed to accountability, if not transparency per se, as beneficiaries can better trace the payments, and better control their receipt.

Sensitivity to local language needs: The task team noted that that efforts were made to post copies of reports in both English and Urdu when feasible. Involvement of NGOs in some control and cross-checking activities also contributed to social accountability, and likely contributed to transparency as well.

Outcomes

Program improvements likely resulted from feedback loops from two sources attributable to the project: a)
the process and impact evaluations and their early analysis of beneficiary costs and program inefficiencies (e.g. some beneficiaries receiving only 3 of 4 payments; leakages due to informal "fees demanded"; long distance to access points; etc.). Analysis of these sources of dissatisfaction plausibly led to corrections that produced the high level of satisfaction with the BISP programs at project end (97%); b) the MIS system plausibly increased the effectiveness of the grievance and appeal system.

Rating
High

Objective 3
Objective
Revised PDO (after restructuring in March, 2012): Support the EXPANSION and strengthen the administration and performance of the country’s safety net with particular focus on the Benazir Income Support Program (BISP) as the national safety net platform

Rationale
Outputs:

Expanded coverage of UCTs of the BISP program, due to the AF (fully attributable to the project): a) 5.6 million households (estimated 28.5 million people) received the basic cash transfer (to one female per household), as per eligibility determined under the PSC system, against a baseline of 2 million and target of 5.5 million respectively; b) USD 90 million allocated for disbursement against DLIs for UCTs for all eligible beneficiaries was disbursed (USD 31 million of IDA funds and USD 59 million of DfID funds). Other funds available under the project may have also financed the basic cash transfers; the ICR's explanation of revised allocations between TA and cash transfers is unclear; c) geographical coverage was expanded, as 99.5% of districts were covered by the targeting process, against a baseline in April 2009 of 5%.

Expansion of the WeT primary education promotion program using CCTs beyond the pilot stage: USD 110 million was disbursed against DLIs for this benefit, but this expansion did not reach additional beneficiaries to those already counted above, as only BISP beneficiaries with primary age children (5 – 12 years old) were eligible. However, it increased the value of the cash transfers received per eligible household. The ICR (p. 36) stated that funds were released under a DLI that called for at least 3 million children of existing BISP beneficiary families to be "attending school… monitored and paid in accordance with their co-responsibility." However, with no baseline information on school attendance, attribution cannot be established. Also, according to the task team, other donors provided parallel financing to the WeT project.

Additionality of project funds: (partially attributable to project): After the nationwide roll-out of the PSC, estimates were that beneficiary families’ numbers would increase to about 7 million, 2 million more than the earlier target set. However, the GoP had only approved the budget to cover BISP transfers to about 3.5, 4.0, and 4.5 million families, respectively, in 2012, 2013, and 2014. GoP therefore decided to seek donor support
rather than leave millions of eligible families vulnerable, and the AF provided part of that expansion in coverage. According to the task team, the AF may also have contributed to the GoP's ability to adjust the annual payment for inflation each year during the last five years.

| Rating | Substantial |

## 5. Efficiency

**Economic Analysis:** The economic analysis section of the Project Appraisal Document (PAD, p. 19) centered on a qualitative treatment of expected socioeconomic benefits from improved protection of the vulnerable poor from shocks, based on international experience. The ICR did not explicitly redo this analysis based on actual results, but it did report results from the impact evaluation (imprecisely and largely without remarking on statistical significance). Both the PAD and ICR could have done a benefit/cost analysis based on: a) simple additional value of cash transfers (similar to the analysis of percentage of administrative costs needed to deliver the transfers, see below), or b) the value of "waste averted" from improved targeting that prevented payments from being made to ineligible citizens (using data from the previous system). The PAD's analysis (p. 6) did make assumptions on expected improvements in targeting efficiency to be achieved, and these assumptions could have been used for benefit/cost analysis. The ICR could then have reported deviations from those assumptions and redone the benefit/cost analysis.

**Administrative Costs:** The ICR stated that the BISP is a highly cost-efficient safety net compared to other programs of a similar nature in other countries, but does not provide specific information. Furthermore, there were inconsistencies in the figures cited: the cost to transfer ratio was given as 2.5%, with a proviso that this low cost may reflect lower efficiency of some local offices (p. 19); but costs of 6 – 7.5% (denominator not stated) were also cited (p. 38). However, with the possibility of statistically insignificant benefits with respect to poverty reduction (the transfer payments reportedly led to decreased casual labor on the part of the male, and increased savings), the IRR may still not have been positive, depending on definition and measurement of benefits.

**Timeliness/Delays:** There were, at minimum, moderate delays. The ICR (p. 15) stated that in early project implementation, before restructuring, there were some implementation delays and moderate procurement and financial management issues, as BISP was a new agency unfamiliar with Bank procedures, but these delays were compensated by good progress in the DPC implementation. After restructuring, the implementation pace is reported to have picked up. Elsewhere in the ICR, however (p. 13), persistent and "significant delays" were reported in processing payments under some signed contracts, despite efforts of the task team. The ICR did not specify which contracts were delayed, nor the percentage of total expenditures represented by them. Meanwhile, the two closing date extensions represented a delay of one year, which is 16% of the total project period. Given the complexity of the project after restructuring, these delays are not reflective of
substantial inefficiency.

- **Use of DLIs:** There is insufficient evidence to demonstrate the impact of the use of DLIs on project efficiency. DLIs are meant to provide incentives for timely implementation, but since the dates of release of funds were not given in the ICR, there is no evidence that these incentives were meaningful in this case. The ICR did not link the two last closing date extensions to a possible need to complete disbursement of some DLIs.

- **Costs to users reported in early feedback and project response:** It is laudatory that the ICR reported on costs to users of receiving transfers, but trends were not reported. No evidence was given that course corrections reduced these costs; however, the increase in satisfaction with the program to 97% by project closing plausibly suggests so.

- **Comparison to counterfactual:** The counterfactual in the case of this project was the earlier poor targeting of GoP SN programs, which reached only 46% of the population in the bottom two quintiles. The ICR did not report whether those receiving cash transfers under the previous programs continued to do so. The increased targeting efficiency (reaching 75% in those quintiles) demonstrates the increased efficiency and efficacy of this program, BISP, but does not provide information on the efficiency of project implementation, per se, relative to alternative project designs.

- **Summary:** While there is a case for rating efficiency as Modest, given: a) the lack of an IRR analysis when it was feasible; b) the lack of firm evidence on positive benefits exceeding administrative costs of the program, even without including all project-funded costs; and c) the lack of firm evidence on whether use of DLIs sped up disbursements, there is enough **plausible evidence for a rating of Substantial**, so as not to penalize the project for shortcomings in quality at entry (lack of IRR analysis in the PAD) and shortcomings in reporting of evidence in the ICR.

### Efficiency Rating

**Substantial**

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

### 6. Outcome
Original objectives: Relevance of Objectives is rated Substantial, as there were minor shortcomings related to the missed opportunity for a more outcomes-focused PDO. Relevance of Design is rated High due to tight linkages between the project's planned activities and intended outcomes. Achievement of the objective to enhance the operation and management of a nationwide, effective safety net system for the poor is rated Substantial, with minor shortcomings related to a few issues around attribution, and the fact that some components remained to be completed at project closing (according to the government's ICR). The objective to enhance the operation and management of a transparent safety net system was Highly achieved, with output and outcome targets exceeded. Efficiency is rated Substantial. Minor, almost moderate, shortcomings in efficiency relate to the lack of IRR calculations and less than optimal amount of evidence presented. Taken together, these ratings indicate only minor shortcomings in the project's preparation and implementation, producing an Outcome rating of Satisfactory under the original objectives.

Revised objectives: Relevance of Objectives and Design are both rated High. The relevance of the objectives was improved with the addition of the outcome-oriented objective to expand the country's safety net. The objectives around effectiveness and transparency of the safety net system are considered essentially to have carried over under the revised objectives, now framed as "strengthening of administration and performance." There were minor shortcomings in achievement of the expansion objective, mainly attribution issues around the WeT program and uncertainty on additionality, so that the expansion objective was Substantially achieved. Efficiency remains Substantial. These ratings are again indicative of minor shortcomings in the project's preparation and implementation, producing an Outcome rating of Satisfactory under the revised objectives.

Since the outcome ratings are uniform before and after restructuring, it is not necessary to calculate a split rating. Overall Outcome is rated Satisfactory.

a. Outcome Rating
   Satisfactory

7. Rationale for Risk to Development Outcome Rating

Risk to development outcome is rated substantial, although the task team stated that some risks may have declined since project closure, and the approval of a new follow-on credit mitigates some risks. This new project, the National Social Protection Program-for-Results Project (P158643), was approved in March 2017 with an objective to consolidate SN project results and further improve BISP beneficiaries’ access to complementary services, providing opportunities to achieve self-sufficiency in the longer run. Again, collaboration with DfID (and use of common DLIs) is a feature of the new project, for which IDA is providing USD 100 million.

Ongoing risks are: a) macroeconomic = substantial, given fiscal pressures from competing expenditures for defense and possible natural disasters, and, according to the ICR, slow progress on some structural reforms; however, the recent budgetary allocation for BISP greatly exceeded the task team’s expectations; b) political = substantial, since elections are in 2018, and political will is needed to complete some of the BISP program; mitigating this risk is broad support for BISP across all active political parties (according to the task team), and
the government’s ICR indicated that with the new approved follow-on credit, political support will be sustained; c) institutional = substantial, since, per the ICR (p. 23), the "BISP program faces some modifications, which will require time and investment to fully implement," particularly regarding coordination between the national, provincial and lower levels of government, and the need to "institutionalize" some operations that had been subcontracted to "partners." However, the task team indicated that capacity of BISP is strong and that there is no risk that the project interventions produced dependency on TA); d) technical = moderate, in that the program is highly dependent on its MIS system for targeting, operations grievance redressal, and linkages between the cash transfer and the WeT programs; e) disaster = moderate, in that the current BISP calls for stable eligibility over five years and, should a major disaster occur, as an earthquake did some six years ago, an adjustment to this targeting formula may need to be worked out.

a. Risk to Development Outcome Rating
   Substantial

8. Assessment of Bank Performance

a. Quality-at-Entry
   The design of the project was based on significant prior analysis of Pakistan's socioeconomic context and previous programs (Pakistan poverty alleviation fund; cash transfer programs after the earthquake) as well as international experience with poverty, vulnerability to risk of the poor, and unconditional and conditional cash transfers that aim to addresses these issues. The design of the PSC mechanism was analytically based and thorough. The design included a strong emphasis on public information campaigns whose importance to achieving high coverage and acceptance of the targeting mechanism was borne out by the project's implementation experience. Preparation included review of Pakistan's record on procurement standards, which revealed gaps that required TA components reflected in project design. The PAD contained a very detailed design of the MIS for the BISP. In line with international best practice, the project called for separate agencies to conduct the enrollment process, determine program eligibility, and pay benefits. The project also included monitoring, evaluation, and other control and accountability mechanisms of the program as an important element of the reform agenda. The mix of a TA credit with a DPC with milestones, elaborated after coordination with the International Monetary Fund, fit Pakistan's needs.

There was no explicit theory of change in the PAD that related the project's components to its intended outcomes/objectives, but the choice of planned activities was appropriate, and the M&E arrangements and indicators were basically sound. Some indicators could have been more clearly defined, (e.g., two indicators duplicate and were tautological -- "paid BISP beneficiaries eligible under the PSC" and "number of female beneficiaries that receive payment" (since all beneficiaries who received payment were female and eligible) -- but adjustments were made at later restructurings in many cases that improved the indicators' articulation and specificity. There were also several indicators where the time frame (annual or cumulative?) was not clear.
Minor shortcomings included a lack of baseline information on school attendance, and omission of a quantitative economic benefit/cost analysis when one was possible.

**Quality-at-Entry Rating**
Satisfactory

**b. Quality of supervision**
Bank supervision of the operation was proactive and involved a high degree of continuity and coordination among related operations. The teams responsible for the SN and DPC operations had substantial overlap. Thus, despite the cancellation of the second tranche of the DPC due to an unfavorable macroeconomic assessment, Bank staff were resourceful in identifying and preparing the AF arrangement (with cofinancing from DfID) to support the continued need for capacity building and policy dialogue for reform of the BISP, with full Government support. According to the ICR, the Bank team was also structured soundly, with three task team leaders overseeing different areas of the project.

The merit of the decision to extend CCTs to BISP program beneficiaries at restructuring was not clear. The reasons families gave for not sending children to schools were diverse and only partially related to income constraints and the need for labor. The fact that neither the government nor the provinces had invested in such programs prior to Bank involvement may have signaled less GoP commitment to the CCTs than to the UCTs of the BISP. The positive impact of the WeT program as demonstrated through impact evaluations mitigates this concern somewhat, as does the interest of other donors (United States Agency for International Development (USAID) and Asian Development Bank (ADB)). The larger objective of providing a longer-term set of programs of investment in human capital and diversified livelihood options to allow families to exit from dependency on the BISP program was laudable. According to the project team, the follow-on project has indeed attracted parallel donor funding (USAID and ADB) to pursue that aim.

**Quality of Supervision Rating**
Satisfactory

**Overall Bank Performance Rating**
Satisfactory

9. **Assessment of Borrower Performance**

**a. Government Performance**
According to the ICR (p. 25), strong government commitment and political will were instrumental in moving the safety net reform agenda forward in Pakistan. The government took politically difficult but necessary decisions, including phasing out parliamentarian-based beneficiary identification in favor of an objective, PSC-based eligibility system. (This was a prior action for the Poverty Reduction and Economic Support operation that preceded this project.) The ICR (p. 25) stated that, to achieve broad-based approval of the program, the government appointed nonpolitical members to the BISP Board. Legal and administrative
reforms were also initiated to further strengthen the BISP as a nationwide safety net mechanism, for example, initiating the WeT program under its authority.

The government also provided significant independent counterpart funding for the BISP cash transfers. BISP’s budgetary allocation has more than doubled from 2012/2013 to 2015/2016 and was further raised to USD 1.1 billion in FY2016/2017. GoP provided 86% of total program spending in FY2015/2016, with development partners contributing the remainder (ICR, p. 38). Since the project ended, according to the task team, the Parliament has substantially increased the budget for BISP even further.

Government Performance Rating
Satisfactory

b. Implementing Agency Performance
BISP was the project’s implementing agency, with the Planning Commission providing technical leadership for the development of the Pakistan Social Safety Net Policy Framework. BISP was structured to have an independent Management Board and a Technical Advisory Committee with some members representing non-governmental organizations. A project management unit was established under the project and staffed with competent managers and procurement, financial management, and M&E staff. The project also financed consultants who provided TA to strengthen BISP’s capacity. BISP has regularly prepared half-yearly progress reports for the Bank and facilitated supervision and technical missions. It had a good record on following up on mutually agreed actions. However, according to the ICR (p. 25), "efforts to continuously improve procurement and M&E are also in place," implying some room for further improvement. The task team expressed strong confidence in the BISP M&E team’s capacity.

Implementing Agency Performance Rating
Satisfactory

Overall Borrower Performance Rating
Satisfactory

10. M&E Design, Implementation, & Utilization

a. M&E Design
The project was designed to support BISP monitoring through both strengthened internal monitoring systems to provide oversight to its cash transfer programs and external third-party monitoring and evaluation mechanisms. For the internal monitoring systems, the most important element was a comprehensive MIS (PAD, Annex 11). The PAD also called for a dedicated M&E unit to support the monitoring of its programs. A computerized appeals and complaints system and social accountability mechanisms were also a feature of the design to establish feedback loops. After restructuring, the design called for detailed monitoring of the WeT CCT component, involving verification by school officials. The results framework was appropriate to the PDO, including indicators related to program reach, targeting
effectiveness, and transparency. Gender disaggregation was planned.

A mid-term review and multiple-round impact evaluation was planned. The PAD noted an intention to analyze the project’s effects along various social dimensions, including gender and ethnic minority groups. The task team stated that project design included a rigorous impact evaluation using control groups. A basis for the impact evaluation was provided by a 2009 BISP beneficiary survey that analyzed use of UCTs for such expenditures as food, medical care, debt, clothes and education.

The emphasis not only on results, but also on process indicators (information obtained both through surveys and spot checks by third parties), proved very useful, including, for example, the analysis of costs to the user of accessing their UCTs.

b. M&E Implementation

M&E system implementation included collection of results indicators, control and process indicators, process evaluations, and impact evaluations. The monitoring system fed into biannual reports to Bank staff. Monitoring of the WeT CCT system was added later, after the AF. The BISP tehsil offices coordinated with the provincial education departments to obtain the co-responsibility monitoring data related to children’s schooling. The BISP tehsil offices also monitored processes of the CCT program implementation and provided this data to the BISP regional and national office teams. The BISP undertook field supervisory missions. Third-party assessments were also implemented by partner organizations, including spot checks and continuous process evaluations.

The mid-term was implemented as planned, as was the multiple-round impact evaluation for the BISP cash transfer programs (ICR, pp. 11–12). After the baseline was set, there were three annual measurements for UCTs and one for CCTs. The impact evaluation assessed the impact of transfers on the socioeconomic condition of beneficiary families and the allocation of the additional income among education, food, health, and other expenses. In the project's last year, it assessed the impact of transfers on enrollment and school attendance of children of eligible age supported under the WeT. The President of Pakistan launched the final Evaluation Report, and all reports were placed on the BISP website.

A process evaluation, funded by DfID, had three rounds of data collection on operational issues and issued corresponding recommendations. Planned spot checks (for NSER data collection and UCT payments) and operational review of the CCTs were also implemented.

Internal M&E completed included: a) an operations review using spot checks and a process evaluation of the NSER update through desk-based self-registrations, including data quality checks; b) verification of desk-based data in Haripur and Bahawalpur; c) M&E of payment processes through tehsil offices; d) joint monitoring (by banks and the BISP) of beneficiary payments; and e) internal evaluation of the WeT pilot of 2016. Development of the WeT monitoring plan to shadow the activities of implementing partner firms was still in progress at the time of the ICR.
c. M&E Utilization

The ICR did not comment on the findings of the mid-term review and whether they were used. The process evaluation funded by DfID did yield recommendations that were presented to the relevant agency sections for necessary course correction; the response and actions performed by the concerned entities were then documented and reported to DfID. The ICR (p. 11) stated that the purpose of funding the process and impact evaluations was "to learn about the quality of program implementation." However, few concrete examples were given of actual cases where findings fed back into changed design or improved implementation. The main plausible case had to do with use of technology-based payments; although the ICR did not report its results precisely, the achieved 97% overall satisfaction with the program at project closing implies the introduction of changes that improved beneficiary satisfaction. The evaluation findings were clearly used for the ICR's reporting, preparation of the follow-on project (which calculated an IRR of 19% for anticipated WeT support under the project), and the mobilization of parallel donor support for complementary programs.

This project comes close to a best-practice case for M&E. A rating of Substantial (rather than High) for M&E Quality is assigned, however, based on: a) some flaws in definition of indicators in the RF; and b) shortcomings in the ICR’s full reporting of the methodology of the impact evaluations and the statistical significance of their findings.

M&E Quality Rating
Substantial

11. Other Issues

a. Safeguards

The project was Environmental Assessment category C. There were no public works, only provision of goods, services, and cash transfers. No safeguard policies were triggered. However, the institution of an appeal and grievance system and social mobilization programs (women's groups in the tehsils where the WeT program was being implemented) was part of a plan to provide safeguards against possible adverse social impact arising from a large transfer program that would benefit only a part of the population, which could increase inequities if implemented poorly.

b. Fiduciary Compliance

The ICR reported that procurement and financial management arrangements were largely within the satisfactory range throughout the project’s life, with moderate shortcomings identified and addressed by the Bank and the client. Most procurement activities were funded under the TA component, while the AF mainly disbursed for cash payments linked to DLIs. At closing, the project status report rated fiduciary aspects as moderately satisfactory. An integrated fiduciary assessment conducted in mid-2016 concluded that the procurement, finance and accounts, and internal audit teams were adequately staffed with experienced and
qualified professionals. The procurement manual and asset management system were adequate, and periodic spot checks were regularly conducted by internal auditors. The improved payment verification system was also tested in 2016. Some minor issues were raised in some annual audits but were addressed by the implementing agency.

However, significant delays in processing payments under some signed contracts were reported to the Bank and ICR teams. Despite assistance from Bank specialists, these delays reportedly persisted over time (ICR, p. 13).

c. Unintended impacts (Positive or Negative)
Unintended positive outcomes included: a) more women obtained identity cards, which can help them access other social services (plausibly attributable to the project); and b) female beneficiaries may have gained status in their households, in terms of mobility, voting, lower tolerance of violence, and higher involvement of spouses in household chores and agriculture (qualitative triangulated evidence) (ICR, pp. 21-22 and 23).

d. Other
Indirect benefits included: a) the socioeconomic registry is now also used by other organizations involved in pro-poor programs and research; and b) the project attracted substantial donor financing, leveraging the Bank’s assistance with little additional cost, due to the use of a common RF by all.

12. Ratings

<table>
<thead>
<tr>
<th>Ratings</th>
<th>ICR</th>
<th>IEG</th>
<th>Reason for Disagreements/Comment</th>
</tr>
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<tbody>
<tr>
<td>Outcome</td>
<td>Highly Satisfactory</td>
<td>Satisfactory</td>
<td>Relevance of the original objectives is rated Substantial due to the missed opportunity to formulate more outcome-oriented PDOs. Achievement of the objective to improve effectiveness is rated Substantial; although outputs were fully achieved, there were WeT attribution issues and minor shortcomings in the evidence presented on outcomes. Achievement of the expansion objective is also rated Substantial, due to the WeT attribution issues and the</td>
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13. Lessons

The ICR (pp. 25-26) presented several useful lessons, augmented here:

1. Design of major social safety net programs benefits from analysis of the shortcomings of past programs in-country as well as international experience. Past social safety net interventions in Pakistan suffered from inadequate institutional arrangements and lack of coordination among diverse agencies and safety net programs, as well as political pressures and governance issues that compromised objective targeting. Providing a clear analysis of these past shortcomings to the government helped Bank staff lay the foundation for this project in terms of the needed political leadership, broad ownership and clear organizational structures, accountabilities, and coordination mechanisms for an improved program. The design of safety net programs should start by analyzing current needs, the policy environment, and lessons from past efforts, and then identify the required improvements, optimal institutional structure, and best means to provide sufficient technical assistance for that structure.

2. Linking a technical assistance or investment operation to a development policy credit with clear milestones for achieving progress helps to increase leverage and ensure sustainability of policy and program reforms. In the case of this series of projects, momentum gained by the pairing of the projects also helped leverage additional donor financing which materialized in the Additional Financing, and the use of disbursement-linked indicators provided a common framework for donors and incentives to government institutions for speedy implementation.

3. Assembling and maintaining a task team with the necessary background, skills, and country knowledge – and maintaining their involvement in all related operations, combined with a significant and high-level presence in the country -- provides important technical continuity for a complex operation. The depth of involvement and high level of staff continuity in implementation of these projects (the technical assistance project and development policy credit in the first phase, and the additional financing and UK Department for International Development trust fund after restructuring), provide a good-practice case of staff continuity.

4. Calling on all involved donors to embrace the same umbrella objectives, use a common results framework,
and harmonize complementary assistance streams can improve project outcomes and learning for all. In the case of these projects (technical assistance and development policy credit), the continuous involvement of UK DfID (from preparation through implementation of both phases) provided essential technical assistance and significant traction for activities to gain momentum. In addition, the involvement of the United States Agency for International Development and Asian Development Bank in providing complementary assistance to programs that will help BISP beneficiaries "graduate" from cash transfer assistance shows promise also to yield benefits for expanded, well-coordinated social safety net programs in the future.

5. In an operation that involves service delivery to the poor, it is important to build in early process evaluations early that analyze costs to the beneficiaries, or other factors that may limit their access or full value received from the program. In this project, the pairing of process evaluations in the early stages, with piloting of specific solutions (technology-based payment systems), led to improvements that plausibly increased beneficiary satisfaction to 97% by project closing. The use of such technology-based systems may provide useful lessons for implementation of similar programs in other country contexts, but piloting is recommended to test contextual sensitivity.

14. Assessment Recommended?

Yes

Please explain

This can be considered a very good practice operation: a) sound design of an objectively defined targeting system for cash transfers based both on prior analytical work in the Pakistan context and international experience; b) use of disbursement linked indicators (DLIs) to provide incentives for rapid rollout of social assistance; c) strong collaboration among donors on complementary measures of support and agreement on a common results framework, and in some cases, common DLIs; and d) well-planned and executed monitoring and evaluation. However, the components and analysis of impact were not presented optimally in the ICR. The assessment should be conducted as a program evaluation considering the earlier projects, the complementary development policy credit, and ideally also the follow-on operation that was approved in March 2017.

15. Comments on Quality of ICR

While the ICR presented many useful facts on a complex operation, some guidelines were not followed, producing gaps on some key facts on costs and financing. There were inconsistencies, and much of the evidence needed to justify high ratings of a plausibly very successful project was not provided.

The ICR presented key information about the project’s design, restructurings, and implementation, and largely followed guidelines. Exceptions were: a) the tables in Annex 1 were incomplete (Table 1a did not include sources of financing other than IDA and did not present clearly the actual expenditures; Table 1b left
blank "other sources"); b) the Annex on "Outputs by Component" described fully all the TA components but left out the largest and most important outputs after restructuring, actual cash transfers; c) the methodology of the impact evaluations was not sufficiently described, and there were other gaps in information on components, financing, and M&E; and d) there was little information provided on the previous project in the sector, and no information on what conditions prevented disbursement of the second tranche of the parallel DPC.

A Theory of Change diagram was presented, which covered key assumptions as well as some of the higher-level outcomes expected to result from improvements in the social safety net. However, parts of the diagram mixed the concepts of efficiency and transparency, and the diagram did not represent well the program after restructuring: missing were: a) the addition of the WeT CCT program, whose success could depend on behavioral change variables; b) the key role of the subnational level in education, since passage of the 18th Constitutional amendment; and c) the increased risk/complexity that came from the increase in scale and coverage after the AF, and addition of substantial joint cofinancing (which would have warranted an additional assumption).

The ICR emphasized results, although not all assertions of results were fully supported by evidence, and there were some key gaps in information, e.g.: a) while it is credible that the combination of the SSN TA and DPC brought complementary benefits, these were never fully described; b) references to administrative costs being "low by international standards" were not supported by specific country references or citations; c) claims of leveraging of USD 1.2 million in donor financing (and USD 2 billion in GoP financing, which is inconsistent with the total costs table in the AF document) were not fully explained; and d) there was no quantitative analysis of program achievements relative to costs; cited effects on expenditure in absolute figures gives no perspective on the degree of change, and the effect on poverty-related variables is specifically stated to be not statistically significant. The presentation of analysis of costs to users (distance to cash transfer points, leakages) was useful in presenting a balanced view on the difficulties of rolling out a complex SN program, e.g. in the early stages, even the "low bar" of "receiving 3 of 4 payments" was only achieved at an 87% level, signaling needed improvements. However, the ICR, while emphasizing the move to use of technology-based payments, did not present specific evidence that such changes lowered costs to users. The lessons were largely well presented and drawn from evidence supplied elsewhere in the ICR.

Other gaps in information: a) the allocation of funds after AF and restructuring as related to the titles of the original components were not well explained. (e.g., the large deviations of actual expenditures on Components 1 and 2 from those estimated at appraisal in the table in Annex 1; b) it would have been useful to include the dates the DLI-linked disbursements were made (to provide evidence on whether they sped implementation, and to determine if the extensions of closing dates were linked to late achievement of any DLIs); c) in reporting on achievement of the indicators, in cases where mere "numbers" of policy improvements were reported, the ICR did not provide a description of what was achieved; and d) the discussion on the implications of inflation for the value of the BISP payments did not make clear whether or not inflation was an ongoing problem. The task team clarified that the amount of the cash transfers had been adjusted for inflation in each of the last five years.

Shortcomings in analysis: In most parts of the ICR, figures on impact were cited without reference to whether or not the changes were statistically significant (the one exception was paragraph 78). Similarly, in
some cases, the time frame of targets was not clear in the RF. Analysis of the most important potential result of cash transfers -- on poverty-related variables-- was flawed by both lack of definition of the terms "poverty rate" and "poverty gap." There were also internal inconsistencies: a) the number of restructurings was inconsistent between the data sheet (p. viii) and page 9; b) the reference on page 19 to Component 1 (USD 34.6 million) being "doubled" to allow inclusion of more beneficiaries was inconsistent with the figures in Annex 1, page 28; c) the ICR (p. 27) referred to the DPC as "successfully disbursed," whereas page 24 stated that a second tranche was canceled due to macroeconomic issues; d) Annex 2 stated that the project has contributed to reducing poverty among beneficiaries by 7% relative to non-beneficiaries with like characteristics, but on page 21, the impact was characterized as "not statistically significant" and dependent on the method of determining the poverty line; e) two different references to indicator 7 (RF Table and page 18) mixed the concepts of school enrollment and attendance; and f) figures on disbursements on pp. vii and viii provided inconsistent data on the amount of disbursements at the time of the first restructuring, an important figure.

Conciseness and quality of writing: Significant duplication could have been resolved with cross-referencing. Yet, as mentioned, some essential information was absent. Also, there was use of jargon not well explained, e.g. "co-responsibilities" (related to WeT eligibility); "exit or graduation" (reduction of dependence on UCTs); "social mobilization" activities (organization and support of women’s groups in the tehsils for WeT beneficiaries); and "local partners" (presumably subcontractors). There were several references to "spot checks" without clarity on what and who was being checked.

a. Quality of ICR Rating
   Modest